

Biofuelwatch made brief summary points in our original relevant representation, and would like to expand on these, adding detailed evidence to support our case.

#### Carbon Neutrality:

I wish to expand upon points made in Biofuelwatch's initial submission. While we recognise that the Planning Inspectorate is bound by Government Planning Policy, we believe that the proposed development does not reflect the growing scientific consensus that burning wood for energy is not carbon neutral. ( [REDACTED] ) This is a view that has been supported by EASAC ( [REDACTED] ), in a 2022 report on forest bioenergy and BECCS. This report highlights the long carbon payback period and the leakage of GHG in the production, treatment, and extended transport supply chains:

“From a climate perspective, the key question in the use of biomass to replace fossil fuels is how long it takes to achieve a net reduction in atmospheric CO2 levels. This is determined by the time taken to offset the increased emissions from biomass (relative to fossil fuels) by reabsorption of CO2 through regrowth of the harvested forest (the carbon payback period). On the basis of the experience of Europe's large-scale conversions from coal to forest biomass, this delay is too long to contribute to meeting Paris Agreement targets. [...] In view of the leakage of greenhouse gas (GHG) in the production, treatment and extended transport supply chains of existing large power stations, the science does not support launching into the conversion of existing large-scale forest biomass power stations to BECCS.”

I wish to expand upon this issue and discuss why adding CCS to a power plant does not mitigate emissions from foregone sequestration or from fuel production and transport, thus calling into doubt Drax's claims to be able to deliver ‘negative emissions’ through BECCS. Given that the ability to deliver ‘negative emissions’ forms a core part of the justification for this proposal, I believe it is essential to examine the validity of this claim and the potential harm to the climate from continuing to burn wood for energy which accompanies it.

#### Biodiversity:

I wish to expand upon biodiversity impacts of the proposed development, both nationally and internationally.

As noted in our initial submission, the proposal will lead to the disturbance and degradation of vital habitats and so risk harming a wide range of protected species. It is therefore not a sustainable development as defined by the National Planning Policy Framework. It fails to protect the natural environment or to enhance biodiversity, and is incompatible with:

- a) Commitments made in the Environment Act 2021 to support the ‘conservation and enhancement of biodiversity in England’
- b) The aims of the Defra Nature Recovery Green Paper (March 2022) ‘to address the drivers of nature's decline including habitat deterioration, loss and fragmentation’.

The proposed development will adversely impact nationally - and internationally - designated areas that cannot be adequately mitigated or compensated for. The application for consent is deficient in that:

- a) It relies on some outdated species surveys from 2018 and therefore does not properly assess the impact on biodiversity of the proposed development.
- b) it does not pay sufficient attention to the potential for damage to watercourses by sediment and accidental release of chemicals.’

There is a further issue of the impacts on international forests and biodiversity of the UK's reliance on imported biomass. Continued operation of the power station is reliant upon further imports of woody biomass and investigations have found that wood pellets burned in the UK come from clearcuts of mature hardwood forests in the U.S. Southeast's North American Coastal Plain which is a Global Biodiversity Hotspot. Research has shown that pellets burned in the UK are also being sourced from primary forests in Canada and from protected forest ecosystems in Estonia and Latvia that are critical habitats for many threatened species. Therefore, the impact of Drax's supply chains should be taken into account by the Examining Authority (for example against Clause 4.1.3 of NPS EN-1) " even if the immediate, cumulative and long-term harm to biodiversity occurs outside the UK.

Parliament is increasingly questioning the applicant's supply chains and CO2 emissions. A recent Secretary of State for BEIS has voiced such concerns. We believe this issue is vital to the consideration of this application, and thus wish to expand upon it at the OFH1.

Imported fuel reliance:

I wish to expand upon the issue of reliance upon imported fuel raised in our initial submission. The proposed development relies on the continued supply of fuel from abroad, hindering the UK's drive to be more self-sufficient in energy. This is contrary to the government's commitment in October 2021 to decarbonise the UK's electricity system by 'building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices.' [REDACTED]

Amines and health:

I wish to expand upon the issues of the health risks associated with the proposed use of amines as noted in Annex C. I have included this in my submission to the ISH1, but I am aware this may be a more fitting space for it and thus have included it here too.

The presence of increased sulphur and other particles mean a direct comparison with CCS cannot be made in terms of the release of harmful amine degradation products (nitrosamines, nitramines and others). Drax acknowledges in its application that existing toxicological data indicates that most nitrosamines are carcinogenic. Moreover, although there is commercially available modelling software, these results cannot be validated due to there being no real world examples on which to test it. In addition, there is a lack of transparency from Drax as to the particular solvents it intends to use with reasons of commercial confidentiality cited. The combination of these issues makes it very difficult to judge the accuracy of Drax's projections and therefore the likely public health impacts of the proposed scheme. There is a widely-accepted principle of using the reasonable worst-case scenario in models, yet it is difficult to have any confidence that Drax's figures represent such a scenario.