

Leeds Trades Union Council has serious concerns about the timing of this Examination, and in view of the requirement to complete it within six months of the first hearing, we feel the only solution would be for the examination to be suspended at the present time:

Firstly, we do not believe that the necessary policy framework is in place against which to assess this application. The government's Biomass Strategy, which was due to be published last year, has not yet been published. Given the increasing weight of scientific opinion that the importation and burning of woody biomass for electricity generation is not in fact carbon neutral as previously believed, and certainly not within a timescale relevant to the achievement of legally binding emissions reduction targets, the content of the upcoming Biomass Strategy cannot be assumed. If there is doubt over the carbon neutrality of woody biomass burning, there is therefore equal doubt over the assumption that BECCS can deliver negative emissions.

Furthermore, since the burners which are proposed to be retrofitted would be nearing the end of their design life by the time the proposed CC was added, the application is in effect an application not just for the CC retrofit but for a new BECCS installation as a whole, so that the whole basis for woody biomass burning should be in scope of the examination, and should be examined against emerging criteria, not the criteria in force at the time of the biomass burning first being permitted.

In a High Court Judgement last year, the Government's Net Zero Strategy was found to be in breach of the Climate Change Act, with the Government being required to publish a revised Net Zero Strategy that is legally compliant by the end of March 2023. As this has not yet been published, this again means that a critical policy framework against which to assess the application is not yet in place.

Moreover, the High Court judgement requires the new Net Zero Strategy to quantify emissions reductions expected to derive from each sector, and to do so will require the ability to quantify the total change in sequestered carbon from the entire life-cycle of woody biomass burning with CCS. Clearly the technologies involved are not at a stage that allows such a quantification to take place (however, we do know that there are NO existing examples of power CCS reaching anywhere near its nameplate capture efficiency, anywhere in the world!). Neither is there yet an adequate monitoring and verification process in place with regard to the supposed sustainability of the sourcing of the biomass. It appears to us that examining the application under these circumstances is very premature, as there is undoubtedly a risk that the approving the BECCS installation would be counter to the legal obligations laid down by the Climate Change Act (2008) and the 6th Carbon Budget. These legal requirements of course take precedence over the NPSs.

As a Trades Union Council we have taken a particular interest in the Applicant's claims that BECCS at Drax will play a crucial role in the wider development of the Zero Carbon Humber industrial complex centring around the development of carbon capture and storage. The Needs and Benefits Statement draws heavily on a report by Vivid Economics containing projections for job numbers and economic benefits in the Humber, and thence beyond to the UK as a whole. However, very shockingly the entire projection is currently without foundation, as the whole depends upon a proposal which has not yet been submitted for examination, for a low carbon pipeline, of which Drax and many other industrial and generating installations would be clients. Even a cursory reading of material relating to CO₂ pipelines suggests that the technological requirements for assessing the safety of the pipeline (eg the likelihood of a rupture) is far from ready, especially give that the range of inputs from different types of installation will make it difficult to regulate pressures and measure corrosive contaminants. Surely it is not sensible to examine the case for carbon capture at Drax when it has not even been ascertained that the pipeline and storage can be consented. Objections are also likely to be raised against the

proposals for storage, and the outcome again cannot be assumed.

Given the current significant uncertainties over national policy, the rapidly emerging evidence that biomass burning and hence BECCS, may after all worsen rather than mitigating total CO₂ emissions (and that the proposed development could lock these in and prove catastrophic both economically and in terms of simple survival), given that there are as yet no adequate methods for measuring whole-life emissions for biomass with or without CC, or ascertaining the impacts of BECCS on total carbon sequestration, given the serious question marks over other components of BECCS (eg the pipeline) on which the supposed carbon capture depends, and the lack of any demonstration projects of relevant scope, we contend that the ExA cannot at this time be in possession of the information needed to make an adequate assessment of the application. We believe that the Examination should be suspended until these various concerns have been addressed and the applicable policy clarified.