

During the Preliminary Meeting I did not directly contribute to the agenda item concerning the draft DCO. Although I recognise that my preceding inputs - both written and (during the Preliminary Meeting) verbal – will be taken into account, I hope that the following summary (which is not exhaustive) will help shape the DCO (as well as the examination in general).

1a) The Preliminary Meeting heard that the applicant is negotiating with government concerning the likely CO<sub>2</sub> capture rate of the proposed works. The 95% minimum proposed (presumably referring to an annual average rather than an occasional maximum) does not reflect the very poor performance hitherto obtained by carbon capture facilities worldwide within the power sector, despite large subsidies. Facilities which compress captured CO<sub>2</sub> at those unsuccessful power stations have not all performed as expected.

1b) 95% may have been chosen for cosmetic, presentational purposes, for example, to boost the apparent credentials not only of the proposal itself but also of the project downstream (to which the captured CO<sub>2</sub> would be supplied and perhaps permanently stored). 95% may also have been chosen to help maximise the likelihood and amount of subsidy (if any) which the UK government provides to the applicant for doing no more than have an “oven-ready” scheme which might never be built let alone operate at an annual average capture rate anywhere near 95% (regardless of whether demand for electricity from one or both units is intermittent or continuous).

2a) If current carbon accounting rules deem that emissions from the applicant’s power station occur in the countries which supply its woody biomass fuel, then it would be absurd for the applicant (and UK government) to claim that any captured and subsequently stored CO<sub>2</sub> from that power station should be credited to the UK or applicant as negative emissions. That CO<sub>2</sub> (net of leakage) should be deducted *pro rata* from the carbon accounts of the supplying countries. *This negates the (ostensible) purpose of the proposal.*

2b) Failing to take this into account might reflect a prevalent view - independent of the industry and its partners - that BECCS projects of the sort and size proposed are unlikely to be plausible or socially acceptable in the foreseeable future.

3a) The applicant’s business is sustained by the subsidy which it receives for burning carbon other than fossil fuel at its Drax power station. Most of that subsidy is due to end in 2027, implicitly making continued operation of that power station commercially unviable.

3b) The proposed works might not need to commence until the latest date necessary to ensure that completion is sufficiently in advance of when the store commences operation.

3c) The applicant itself recognises that the downstream project is likely not to be operational until 2040.<sup>1</sup> 2040 is five years after government policy requires the closure of all unabated (carbon burning) power stations except those whose emissions are outsourced.

4a) As such, it seems reasonable to regard the proposal as if for a new power station (not a going concern) - despite the power station already being elderly (units 1 and 2 implicitly being two of the oldest).

4b) As with the performance of the carbon capture facility (and the readiness of the technology currently proposed), the applicant offers no guarantee that the proposed timelines would be met.

---

<sup>1</sup> Page 23 of Document 5.1.7 “Appendix G Section 47 consultation material. Drax Bioenergy with Carbon Capture and Storage” (05 2022).

5) The applicant has a clear interest in setting aside such considerations in order to accelerate the approval process, so as to lock in its recovery of costs and foregone profit should the proposed works not proceed. Doing so would also help give capital markets and legislators the view that both “BECC without the S” and the “S” are both already bankable.

6a) The contractual aspects of the proposal would be complex. Amongst other matters, they would include the integration of the proposed works with the downstream network and the “complete and permanent” store. The law is at an early stage of evolution concerning CO<sub>2</sub> storage.

6b) The price at which the owners of those facilities accept CO<sub>2</sub> from the proposed works would reflect the extent to which the applicant accepts future liability for that CO<sub>2</sub>. As the Preliminary Meeting heard, the applicant does not propose to accept any such liability – further undermining the viability and credentials of the proposal.

7a) The proposal is predicated on the evermore urgent need to reduce greenhouse gas emissions to zero and maximise CO<sub>2</sub> sequestration. Carbon (especially carbon debt), not sustainability or renewability, is central to the rationale for the proposed works.

7b) However, government policy (currently in flux and perhaps influenced by the industry - even the opposition is receiving donations and sponsorship from Drax) is inconsistent with the climate and biodiversity emergencies.

7c) Government acceptance does not guarantee sustainability or carbon neutrality. As the Preliminary Meeting heard, the applicant deems such acceptance as sufficient.

8) The applicant is having difficulty explaining to parliament and the public that burning imported woody biomass to generate electricity is a climate change “solution” and, crucially, without carbon debt. It is an especially inefficient way of maximising exploitation of the embodied energy in that wood. The application does not seek to capture and sell heat.

9a) The applicant relies on government acceptance of a certification scheme (Sustainable Biomass Program) established by the industry for the industry, despite that scheme’s neglect of carbon debt.

9b) When considering regional certification, that scheme is particularly weak concerning forest fragmentation, soil carbon, *ad hoc* sources of supply, the small percentage of supply chains field-audited, subsequent restoration (like-for-like or otherwise) after clear felling, ecosystem services and other parameters crucial to the carbon balance).

9c) Chatham House<sup>2</sup> estimates that CO<sub>2</sub> emissions attributable to “lost forest growth and decay of residues” in USA add between 19% and 44% to the amount of CO<sub>2</sub> which Drax power station emitted during 2019 when burning woody biomass from its sources in USA. The applicant pays no compensation either for these losses or for subsequent matching sequestration.

10) The extent to which assessing this application should take such upstream considerations into account given that almost all of them pertain outside the UK is unclear.

11) Consideration should be given as to whether Chinese-owned British Steel should be allowed to manufacture strategically valuable items for the proposed works.

---

<sup>2</sup> “Greenhouse gas emissions from burning US-sourced woody biomass in the EU and UK” (10 2021) by D Brack, R Birdsey, and W Walker for Chatham House.