

Biofuelwatch Deadline 3 comments on written representations on responses to questions from the ExA to the Applicant (REP2-060)

- AQ 1.7 of REP2-060, Drax asserts: *'Local authorities undertake widespread monitoring of pollution concentrations in the study area and, where these are elevated above background pollution levels eg, Selby AQMA, they have been explicitly included in the Predicted Environmental Concentrations,'*
- We would ask the ExA to request that Drax provides evidence of its assertion that *'Local authorities undertake widespread monitoring of pollution concentrations in the study area.'*
- AQ 1.8 of REP2-060 Sulphur emissions - we understand emissions of sulphur from wood are less than those from coal, and therefore do not require Flue Gas Desulphurisation to remain within EALs.
- However the applicant's response to the ExA's question states that it intends to reduce sulphur emissions *post carbon capture*. This does not address the concerns we raise in our written submission REP2-073, page 32 regarding the additional challenges regarding CCS when applied to biomass retrofits and new build due to the impact of flue gas impurities, including sulphur, on the carbon capture process, and the associated uncertainties regarding the emissions of the plant especially with regard to nitrosamines.