

Submission by Deadline 5 - Drax Bioenergy with Carbon Capture and Storage Project

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1 During ISH4, I presented some views about the context of the applicant's proposal and some observations concerning the draft DCO.

2 Those observations concern:

(i) what would go into the proposed works - biomass which, due to the applicant's choice of trees rather than agricultural crops, gives rise to fundamental concerns about carbon debt / payback, as well as valid concerns about social and environmental sustainability, increased clear-cutting (complementary to, and boosting the viability of, the sawmilling industry),

(ii) what would come out – specifically, compressed CO₂ in variable quantity which might not be stored permanently (or in conformity with a globally accepted protocol),

(iii) the performance of the proposed works - in particular, the percentage of post-combustion CO₂ emissions which, each year, would be supplied to others post-compression, and

(iv) the need to make up for the energy penalty associated with use of the proposed works.

3 In relation to the DCO for the Net Zero Teesside project, ClientEarth has raised concerns about carbon capture rates under different circumstances. For example, (i) while the captured CO₂ is actually being injected for permanent storage and (ii) if CO₂ emitted by generating units connected to a carbon capture facility bypasses that facility (or is released into the atmosphere after entering it) during the commercial operation of those generating units. ClientEarth did so in representations to National Infrastructure Planning – for example RR-004, REP2-079, REP4-033 and REP6-129.