

Biofuelwatch's comments on The Government's response to the recommendations made by the Independent Review of Net Zero.

The main relevant points are that in its response the Government responded to recommendation 43 'that the Government should publish its Biomass Strategy as soon as possible' thus:

Government has committed to publishing a Biomass Strategy in 2023. The Strategy will set out how sustainable biomass could be best utilised across the economy to help achieve the government's net zero and wider environmental commitments while also supporting energy security.

The implications for the planning application are the fact that by necessity the ExA is examining the application ahead of this to-be-published-imminently strategy, it is impossible for the ExA to assess the application against this strategy and judge whether it is in line with it. We therefore reiterate our position that it is premature for the application to be considered now, given the Biomass Strategy has still not been published.

The response to recommendation 57 'Government should announce, as soon as is possible, its intentions for engineered Greenhouse Gas Removal (GGR) business models including timings and eligibility. This announcement must clearly outline what standards these business models are expected to require.' Included that *BECCS projects will be required to demonstrate compliance with strict biomass sustainability criteria*

Read in conjunction with the Powering Up Britain documents this suggests that with a re-emphasis on perennial energy crops and short rotation forestry, Drax's current sourcing of imported woody biomass from a variety of sources, would not comply with these strict biomass sustainability criteria for BECCS projects.