

## **Submission of James E Hewitt for Deadline 9**

1 The current date for publishing the Biomass Strategy has been delayed yet again. It is now due shortly after the planning process closes, perhaps not by coincidence.

2 The two year delay in implementing the proposed works is incompatible with the climate emergency, and is inconsistent with the Track 1 go-ahead given to the East Coast Cluster, to whose infrastructure the Applicant's CO2 would be transported. Implementation is now so far in the future – when circumstances will greatly differ from those now current - that it would be inappropriate to do anything other than either recommend against approval of the DCO or postpone judgement on it.

3 The Application is presented as if it were a BECCS project – misrepresenting the reality. If this is not apparent in the DCO, I wonder whether it should be.

4.1 The Secretary of State might approve the DCO (whatever the Examining Authority's recommendations), doing so partly on the assumption that post-combustion emissions (in addition to sequestration foregone and loss of soil carbon) should be deemed zero in perpetuity – regardless of potential changes in government, revised policy, the evidence and the (long imminent) re-evaluation of the Biomass Strategy,. Whether it should or would provoke Judicial Review remains to be seen. If those post-combustion emissions were zero, there would be no need for the proposed works – whose sole purpose (other than to generate subsidies for the Applicant) is to capture those implicitly non-existent post-combustion emissions. Drax power station remains the largest single point source of such greenhouse gas in the UK.

4.2 The same could be said if the DCO were approved on the assumption that those emissions are immediately sequestered. There is currently no contractual requirement, whether or not including payment, for landowners to ever sequester all or any of those emissions - rather than any other CO2 emitted closer to their land. The countries from which the applicant imports that woody biomass are all net emitters of greenhouse gas. There may also be no *de facto* legal requirement for clear-felled forest to be restored.

The text below further considers the imported woody biomass which is burned at Drax power station and the related post-combustion emissions.

5 The cumulative impact on the counties and districts from which the Applicant's woody biomass derives is not taken into account. That impact is attributable to increased forest fragmentation which, along with clear felling of individual tracts, changes the albedo (contributing to increased temperatures and drought).

Cumulative impacts (and immediate local impacts) – including in relation to environmental justice areas adjacent pellet mills - are ignored by the (contested) regional certification scheme of the Sustainable Biomass Program "SBP".

The Applicant's subsidies do not depend on the sustainability of forest management of the tracts which are the source of the wood raw material of the biomass burned in Drax power station. Neither do they require any carbon accounting. All that is needed is that the supply chains of that woody biomass commence within a region covered by that SBC scheme.

The eligibility for subsidy of the woody biomass which the Applicant burns is being contested with increasing frequency – including in the House of Lords and an enquiry by Ofgem. The contractor which the Applicant hires to collate its submissions to Ofgem (for purposes of substantiating requests for subsidy payments) has been hired to as the contractor for the Ofgem enquiry (in effect, to mark its own homework). The remit of the enquiry has not been

published, but it might require no more than checking that the entities from which the Applicant imports woody biomass assert that the wood raw material derives from regions covered by the SBP's regional scheme.

The following question, posed by Baroness Blake of Leeds, exemplifies the most recent House of Lords debate on the 3<sup>rd</sup> of July 2023.

*“My Lords, when Ofgem opened its investigation into Drax’s biomass sustainability reporting a month ago, it made clear it would act if it found breaches of the rules—the right approach, surely, to a single case. However, what assessment have the Government made of wider compliance with reporting requirements and what steps are they taking to improve monitoring, particularly with regard to the origin of fuel sources?”*

During that debate, Lord Callanan, representing the government, stated that he would take action if Drax were found to not be meeting Ofgem’s sustainability criteria – which, as implied above seem to be over-ridden by the SBP’s regional scheme.

6 Emissions attributable to two sources of CO<sub>2</sub> in particular should be considered. One is that associated with the energy penalty – which would have to be matched by combustion of fossil fuel (which is not zero-rated). The other is the supply chain emissions of the two (or three) biomass units whose post-combustion emissions are not being captured. Including the latter is crucial because, without the subsidies which operation of the unabated generating units seeks to maximise, Drax power station would probably not be commercially viable. Further, recommendation R2023-124 of the Climate Change Committee’s recently published “Progress in reducing emissions 2023 Report to Parliament” states that there should be unabated biomass-fuelled power stations should not operate at high load factors beyond 2027. Amongst other things, this implies that the Applicant’s proposal – which assumes continued operation of all four biomass units – is based on a business model which is flawed (depending on revenue from sale of electricity dispatched and from subsidies from all four rather than at most two units).

6 CO<sub>2</sub> is an asphyxiant (implicitly a handicap to emergency vehicles dependent on carburettors). The risk of a rupture in the pipeline between the Drax power station site and the supposedly permanent store is real (and should be deemed substantial in the context of the variability in the performance of the proposed carbon capture works if it is ever built. Perhaps the most recent rupture was in Satartia, Mississippi. A number of people nearly died as a result of that rupture.

It is as if the Applicant’s proposal seeks subsidy not only by continuing to cause environmental harm and CO<sub>2</sub> emissions through its supply chains and the energy penalty, but also by creating risk of direct harm to people from post-combustion. The UK has no infrastructure for (and implicitly no expertise in) transporting super-critical phase CO<sub>2</sub> in pipelines such as those proposed. Such matters do not yet seem to be reflected in the draft DCO. The most recent draft DCO does not refer to the need to comply with regulations concerning the supply of imported woody biomass. It does not refer to how the performance of the proposed works will be regulated (or whether subsidies would be payable only for amounts actually transported to the supposedly permanent store).

7 Norway has recently admitted that two of its most prestigious CO<sub>2</sub> storage projects (Snøhvit and Sleipner) are not performing as predicted, especially in relation to the amount of storage. “Norway’s carbon capture and storage projects augur geological risks in global aspirations to bury carbon dioxide” Institute for Energy Economics and Financial Analysis. 14 June 2023