

## **Summary of closing submission (deadline 10) by Leeds Trades Union Council**

(248 words)

We list key points from our Deadline 2 submission.

The Applicant is dismissive of respondents' contention that the sustainability of woody biomass burning was relevant to the application. The evidence it advanced regarding claimed carbon capture rate is weak.

The Applicant's response to concerns about local health and ecological impacts fails to follow the precautionary principle.

We have increased concerns about the timing of the Examination, and the delay in publishing the new Biomass Strategy.

The legal requirement to quantify emissions reductions expected from BECCS cannot be met.

The relevant policy is in flux and highly contested. The ExA cannot reasonably base a recommendation on such uncertain foundations.

BECCS must be evaluated as a whole; it is impossible to adjudicate the carbon capture retrofit separately, especially in light of legal requirements for any future "negative emissions" to be accurately quantified.

The potential delay of up to 7 years means Drax cannot contribute to legally binding emissions cuts required before then, and negates Drax's claimed role in the East Coast Cluster. Continued unabated emissions during that time are unacceptable.

Research from the Institute for Energy Economics and Financial Analysis calls seriously into question the reliability of underground carbon storage.

There is no provision for periods of outages and maintenance of the carbon capture, and no certainty as to how the remaining "unmitigated" wood burners would be dealt with.

We have seen no reason to change or qualify our opposition to the Application.