Department for
Business, Energy
& Industrial Strategy

CONSULTATION ON THE EARLY PHASE OUT OF UNABATED COAL GENERATION IN GREAT BRITAIN

Consultation

Closing Date: 26 February 2021

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Any enquiries regarding this publication should be sent to us at:
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1. Introduction

Coal-fired generation has historically played an important role in meeting electricity demand in the UK. However, in recent years coal usage has declined with the growth of the renewables sector and the construction of new gas power stations.

Further reducing reliance on coal is vital for addressing climate change. Coal is the most carbon intensive fossil fuel, producing around twice the carbon dioxide (CO_2) per unit of electricity as natural gas. Burning coal also produces other harmful pollutants such as particulate matter (PM), Sulphur Dioxide (SO_2) and Nitrogen Dioxide (NO_2).

The UK is already among the most successful countries at decoupling emissions and economic growth: since 1990 we have cut emissions by more than 40 per cent, while GDP has grown by over 70 per cent. In 2019, the UK led the world by becoming the first major economy to pass laws to reduce emissions to net zero by 2050. The UK is also among the first countries to have committed to phasing out unabated coal generation, an objective that the Government had originally pledged to deliver by 2025, but now intends to deliver by 2024. The UK is an international leader in the fight against climate change: it co-founded the Powering Past Coal Alliance which now has over 100 members across the globe, and will host, alongside Italy, COP26 in November 2021.

This consultation seeks views on bringing forward the deadline for phasing out unabated coal-fired generation in Great Britain to 1 October 2024. This proposal is part of the Government's drive to go further and faster on decarbonising the power sector, as it works towards net zero by 2050. It will also bring the Government's wider unabated coal phase-out policy into line with the date of application of the carbon emissions limits in the Capacity Market[1]. Subject to stakeholders' views, and any evidence we receive as part of this consultation, the Government anticipates bringing forward draft legislation to implement the proposed phase out date as soon as the legislative timetable allows.

The analytical evidence supporting the proposals in this consultation is set out in the Impact Assessment published alongside this document. We welcome views on this Impact Assessment as part of this consultation.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/886147/Future_improvements__emission_limits_and_coronavirus_easements_-_government_response_to_consultations.pdf

2. Consultation

The Prime Minister announced, on 4 February 2020, an intention to bring forward the deadline for phasing out unabated coal generation from 1 October 2025 to 1 October 2024[2]. This consultation seeks views on how that can be done.

2.1 Policy Rationale for bringing forward the closure deadline to 2024

This proposal is part of the Government's drive to go further and faster on decarbonising the power sector, as it works towards net zero by 2050.

The objectives of intervening to accelerate the closure of unabated coal are to:

i. demonstrate international climate policy leadership, with the aim of encouraging other countries to move away from their use of coal on climate change grounds;

ii. reduce emissions of carbon dioxide and other harmful pollutants from the GB power sector as early as possible; and

iii. increase revenue visibility for investment in new lower-carbon, flexible generation capacity.

A precondition for bringing forward the closure date is, of course, confidence that security of electricity supply can be maintained.

2.1.1 International climate policy leadership

The UK is among the world's leading countries on climate action. The Government intends to continue to set an example to other countries in ending practices which contribute to greenhouse gas emissions. Coal is the most carbon intensive fossil fuel and is responsible for harmful air pollution, and consensus is that unabated coal is not consistent with meeting our decarbonisation objectives. Ending unabated coal generation in 2024 would mean that, in a period of 10 years, the UK would have reduced its reliance on unabated coal generation from around a third of electricity generation to zero.

This achievement would reinforce the UK's international climate leadership by complementing other policy actions for reducing reliance on coal. Already in 2020 we have gone over 4000 hours without coal generation, and we have established a new record for the longest period without coal generation, set at 67 days.

The UK has also led the world in founding the Powering Past Coal Alliance which now has over 100 members, including national and regional governments, businesses and other organisations. The UK no longer provides any new direct official development assistance, investment, export credit or trade promotion support for thermal coal mining and coal power plants overseas. It is also providing £350m in funding to help businesses shift away from coal usage for industrial processes.

[2] https://www.gov.uk/government/speeches/pm-speech-at-cop-26-launch-4-february-2020

The UK's leadership on climate change is especially pertinent given its presidency of COP26. Bringing forward the Great Britain phase-out date will provide important international signalling ahead of COP26 as well as highlighting action to deliver our net zero target.

2.1.2 Reducing emissions from the power sector

The UK was the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target requires the UK to bring all greenhouse gas emissions to net zero by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

As the most carbon-intensive fossil fuel, coal is a major contributor to carbon emissions, producing around twice the carbon dioxide (CO_2) per unit of electricity as natural gas. The burning of coal also produces other harmful pollutants such as particulate matter (PM), Sulphur Dioxide (SO_2) and Nitrogen Dioxide (NO_2).

As a result of our existing policies, including carbon pricing and our support for renewables, we have already made great headway in reducing our reliance on coal, which fell from 39% of electricity generation in 2012 to less than 3% in 2019. A new record for the longest period of coal-free electricity generation in Great Britain was set on 16 June 2020 at 67 days. The previous record of just over 18 days was set in May 2018. On 19 June we passed 2,000 hours in 2020 without electricity from coal-fired generation on the GB grid (4,000 half-hourly settlement periods).

Our assessment, as set out in the updated Impact Assessment (see section 3.2 below), is that bringing forward the date for the closure of unabated coal from 2025 to 2024 is unlikely to yield a significant reduction. This reduction is very small because the original announcement of the policy, combined with other measures, has already delivered most of the emissions reductions that the policy sought to achieve ahead of the deadline. However, any reduction in emissions is positive and reinforces our global leadership.

2.1.3 Increasing revenue certainty for investment in low-carbon capacity

The Government's objective is to ensure that the closure of the remaining coal fired power stations in Great Britain takes place in a way that minimises the impact on the electricity system and provides certainty for investors to enable them to invest in lower carbon alternatives in good time to replace the lost capacity.

We consider that this approach will help stimulate investment in lower-carbon alternatives leading to an overall reduction in the carbon intensity of the generation sector and, by sending a clear market signal to replacement lower-carbon, flexible capacity, reduce risk to the security of the electricity system. It is also important for investor certainty that the Government follows through with its commitment to legislate to end unabated coal generation.

2.1.4 Ensuring security of electricity supply

Safeguarding secure and reliable energy supplies is non-negotiable. The Government has made clear that it will not impose requirements that would lead to the closure of unabated coal without assurance that Great Britain's secure and reliable electricity supply will be maintained.

The commitment to close unabated coal generation by 2025 coupled with other measures such as carbon pricing and market signals including negative dark spreads[3] has resulted in a faster than expected reduction in coal capacity. This has made it possible to consider an earlier closure of unabated coal without risks to security of supply. The Impact Assessment published alongside this consultation confirms that early closure would not introduce a security of supply risk.

The GB Capacity Market (CM) has already secured the capacity we need until 30 September 2024. The amount of coal generation securing agreements has declined considerably, from 10.5GW in the 2017/18 Delivery Year to 1.3GW in the latest T-4 auction for delivery in 2023/24. Capacity auctions, scheduled to take place in early 2021, will start securing the capacity we need from 1 October 2024. Due to the application of carbon emission limits in the CM in relation to existing capacity from 1 October 2024 (see Box 1 below for more information), unabated coal generation will not be able to compete for agreements in these auctions. The Government is therefore satisfied that the CM will secure the new or alternative capacity needed to compensate for the closure of unabated coal.

Box 1: Interaction with the Capacity Market

The Capacity Market is a mechanism for ensuring security of supply while minimising impacts on the wholesale market. It secures the capacity needed to meet future peak electricity demand under a range of scenarios through competitive, technology-neutral auctions held four-years and one-year ahead of the relevant delivery year. Those who win capacity agreements – known as capacity providers – commit to providing electricity during periods of system stress in exchange for receiving capacity payments. Capacity payments are funded by electricity suppliers who recover this cost from electricity consumers. The Capacity Market is also designed to encourage the investment needed to bring forward new capacity to replace retiring power stations and provide back-up for more intermittent and inflexible low-carbon generation sources.

Alignment with target date for Capacity Market Emissions Limits

The EU Electricity Regulation (Regulation (EU) 2019/943), which entered into force on 4 July 2019, introduced a requirement for capacity mechanisms to apply carbon emissions limits. This includes in relation to existing Capacity Market Units (CMUs) (those which had a commercial production start date before 4 July 2019) from July 2025 at the latest. We consulted between July and September 2019 and introduced changes to the Capacity Market Rules (via the Capacity Market (Amendment) (No.2) Rules 2020) to introduce carbon emissions limits. These changes came into force on 30 June 2020 and prevent the most carbon intensive existing capacity (including unabated coal) from competing in auctions for delivery years from 1 October 2024. All new build plant are subject to the carbon emissions limits for delivery years from 1 October 2020.

As coal plants are unlikely to be economic without CM payments, the date of implementation of the CM emissions limits will also have a similar effect to the coal phase out legislation, and this is why we are proposing to align the start dates of the two policies. It is however important to note that the CM limits alone would not be a guarantee that unabated coal would be phased out as, in theory, some coal plants could continue to operate without CM revenue.

As CM agreements have already been awarded to coal-fired generators for delivery years up to 30 September 2024 the Government does not propose ending unabated coal-fired electricity generation before 1 October 2024.

[3] Dark spread is the average revenue a coal power station can expect from generating a unit of electricity during ‘baseload’ operation, after fuel costs.

Question 1
Do you have any comments on the Government's intention to bring forward the ban on unabated coal generation from 1 October 2025 to 1 October 2024?

2.2 Detailed proposals

When determining how to phase out unabated coal by 2024, the Government is not starting from a zero baseline. Policy proposals for ensuring closure by 2025 are already at an advanced stage. Specifically, on 18 September 2017, following a consultation in November 2016 ("the 2016 consultation[4]"), the Government confirmed that it would proceed with action to regulate the closure of unabated coal power generation units in Great Britain by 1 October 2025. The Government Response to the consultation (and accompanying Impact Assessment) was published on 5 January 2018[5] ("the Government Response") and set out policy proposals. This section describes how we plan to adapt and build upon those proposals for the purposes of phasing out unabated coal by 2024.

2.2.1 Emissions intensity limit and its application

The Government Response confirmed an intention to legislate for the closure of unabated coal power generation units by setting a new emissions intensity limit on coal generation (on a unit-by-unit basis) of 450g of CO_2 per kWh. This is broadly the emissions intensity of an unabated CCGT gas generator and is in line with the existing Emissions Performance Standard that applies to new build fossil fuel plant[6].

The Government Response announced it intended to apply the limit to:

- units burning any solid fossil fuel, irrespective of site boundaries, to prevent plants converting to coal gasification, and
- units with a thermal capacity of over 300MWth to ensure that the emissions intensity limit is applied only to generating units that use coal and that there are no unintended consequences for other forms of generation.

[4] https://www.gov.uk/government/consultations/coal-generation-in-great-britain-the-pathway-to-a-low-carbon-future

[5] https://www.gov.uk/government/consultations/coal-generation-in-great-britain-the-pathway-to-a-low-carbon-future

[6] Note that the 450gCO_2/kWh emissions intensity limit outlined here is an *instantaneous* limit. This contrasts with the existing Emissions Performance Standard, which sets an annual limit on CO_2 emissions from fossil fuel generators, based on their capacity and an assumed 85% annual load factor. Applying the existing Emissions Performance Standard on an annual basis could allow unabated coal units to run at relatively low load-factors and therefore would not achieve our objectives.

Compliance with the emissions intensity limit was to be on a net CO_2 basis, in that emissions from other fuels co-fired with solid fossil fuel were to be included in the calculations for emission intensity.

Updating the proposals

Building upon the proposals set out in the Government Response to the 2016 Consultation, the Government intends to introduce legislation for the closure of unabated coal power generation units by 1 October 2024 by setting an emissions intensity limit on coal-fired generation (on a unit-by-unit basis) of 450g of CO_2 per kWh.

The Government proposes that the limit will be applied to relevant "Generating Units" burning any "Solid Fossil Fuel", irrespective of site boundaries.

We propose defining "Solid Fossil Fuel" in line with the Energy Act 2013 as meaning: *(a) coal, (b) lignite, (c) peat, and (d) any substance which (i) is produced directly from crude liquid petroleum, bitumen or any substance mentioned in (a) – (c) for use as a fuel in a Generating Unit, and (ii) when burned, produces a greenhouse gas (within the meaning of section 92 of the Climate Change Act 2008).*

We propose defining "Generating Unit" in line with the Emissions Performance Standard as meaning: *any combination of generators, boilers, turbines, or other prime movers that are physically connected as one unit and operated together to produce electricity independently of any other unit.*

We believe these definitions are sufficiently precise to minimise the risk of unintended consequences for other forms of generation. We do not, therefore, intend to introduce the 300MWth threshold put forward in the 2016 Consultation[7].

We propose that compliance with the emissions intensity limit will be on a net CO_2 basis, in that emissions from other fuels co-fired with solid fossil fuel are to be included in the calculations for emission intensity. The emissions intensity limit will not apply to generating units that convert fully to other fuels. Dedicated biomass or energy crop power stations as well as full-station or unit biomass conversions[8] are not intended to be within the scope of these proposals.

Question 2

- Do you have any comments on the proposed emissions intensity limit and its application? If you disagree with the proposal, please provide detailed reasoning.

[7] https://www.gov.uk/government/consultations/coal-generation-in-great-britain-the-pathway-to-a-low-carbon-future paragraph 13

[8] The Renewable Obligation Order 2015 permits such stations to use fossil fuel, including coal, for permitted ancillary purposes. This is limited to 10% of the energy content of all energy sources used in any month in the combustion unit or generating station. Such permitted ancillary services include; flame stabilisation, temperature control at start up and control of fouling and corrosion. Contracts for Difference and Investment Contracts include equivalent provision limiting the use of fossil fuel to 10% of the energy content of all energy sources used in any month, including ancillary purposes.

- What are your views on whether a 300MWth threshold is necessary to avoid unintended consequences on other forms of generation?

2.2.2 Biomass co-firing

When responding to the 2016 Consultation, the Government recognised that co-firing with solid biomass at relatively high levels was one way that generators might be able to meet the proposed emissions intensity limit. In response to stakeholder concerns over the use of unsustainable biomass in units that co-fire, the Government proposed, for the purposes of compliance with the proposed emissions intensity limit, the net CO_2 emissions from coal units co-firing with biomass should be calculated as the sum of the emissions from the coal element of the fuel diet *plus* net life-cycle CO_2 emissions attributable to the biomass element of the diet.

Updating the proposals

However, given all remaining coal units have either announced closure dates ahead of 1 October 2024, or have no publicly announced plans to facilitate the co-firing of coal and biomass, we propose to:

- introduce a methodology for the calculation of the net life/cycle of CO_2 emissions;
- designate an "Enforcement Authority" with powers to request emissions data on an *ad hoc* basis (as explained in the paragraph below headed 'Monitoring and reporting').

We do not believe it would be necessary to introduce arrangements on monitoring how the net life-cycle CO_2 emissions attributable to the biomass element of the diet is calculated, but wish to seek views on this approach.

Question 3

- Do you have any views on how net life-cycle CO_2 emissions from biomass should be calculated?

- Are you aware of any coal units which will facilitate co-firing of coal and biomass beyond 1 October 2024, or any other reason which would necessitate the introduction of additional arrangements for monitoring biomass co-firing emissions other than those described in the 'monitoring and reporting' paragraph below?

2.2.3 Emergency powers

The Government Response proposed to provide the Secretary of State with powers to suspend or amend the phase out arrangements in case there were significant and imminent concerns about security of supply, where there might be a shortfall in electricity generation, or risk of one, and that suspension would wholly or partially mitigate that risk.

Such an emergency provision is in place for the Emissions Performance Standard (EPS) through the Energy Act 2013[9]. We proposed that the provisions for emergency suspension of the emissions intensity limit broadly follow this model; for instance that it could be applied only once all other reasonably viable measures available to the Secretary of State have already been taken, and be in place for a maximum of 90 days at a time. It was intended that the arrangements could not be invoked any earlier than six months before 1 October 2025.

Updating the proposals

Given the increased level of confidence that security of supply will be maintained (Section 2.1.4), the Government no longer believes it is necessary to provide the Secretary of State with emergency powers to suspend or amend the coal phase-out arrangements. We are now proposing to remove this power.

Question 4
Do you have any comments on the Government's intention not to legislate to give the Secretary of State the power to suspend/modify the emissions limit in emergency circumstances?

2.2.4 Monitoring and reporting

The Government's view is that the introduction of an emissions limit will require a mechanism for verifying compliance to be put in place. We believe that this mechanism should reflect the likelihood that the proposed emissions limit will impact only a very limited number of generators. For this reason, we propose to introduce provisions which will provide a designated "Enforcement Authority" (for each devolved authority) with the power to verify compliance on an *ad hoc* basis.

We propose that the new provisions enable the Enforcement Authority to have the power to request emissions data from the owner/operator of a generating unit, calculated in line with formulae which will be specified, together with accompanying evidence. By suggesting an *ad hoc* basis, we propose that generators will only be required to submit this information, within a reasonable timeframe, should the relevant Enforcement Authority request it. We believe this arrangement will offer a cost-effective solution for ensuring compliance while minimising the regulatory burden on generators.

We are considering which enforcement powers to make available to the Enforcement Authority and welcome your views on what these should entail.

Question 5
• Do you agree with our proposal to provide a designated Enforcement Authority with powers to verify compliance on an ad hoc basis?

[9] See Annex B to the EPS Consultation Response, January 2015

- Do you have any comments regarding monitoring and reporting arrangements that we should take into account? Please provide supporting evidence where appropriate.
- Do you have a view on which enforcement powers should be introduced?

2.3 Impact Assessment

The Impact Assessment (IA) published alongside this consultation considers the impact of bringing forward the closure date to 1 October 2024 from 1 October 2025 and provides an update on the IA published in January 2018[10].

It highlights that the monetised impact of bringing forward coal plant closure to 2024 is not significantly different from that of a 2025 closure, and that earlier closure would not introduce a security of supply risk as new or alternative capacity could be brought forward in 2024 through the Capacity Market to compensate for the early closure of coal.

The IA contains modelling of the future of coal generation in Great Britain with and without intervention.

To reflect the inherent uncertainty in future market conditions, the IA considers a "central" scenario that reflects our best view of the evolution of the electricity market, and two "supplementary" scenarios where assumptions are flexed to create alternative options for coal plant. In particular, in the scenario using high prices for both coal and gas, coal plants retire more slowly.

Table 1 in the Impact Assessment sets out the assumptions that underpin the scenarios, including the price forecasts employed. It is important to note that the assumptions underpinning a more favourable scenario for coal do not reflect established Government policy or expectation and are designed only to demonstrate the risks that investors may perceive.

In the central scenario we project forward the current economic conditions affecting the level of coal generation. In this scenario, coal and gas prices follow BEIS's 2018[11] central trajectory. In addition, the level of penetration of low carbon generation is consistent with the Government's declared policy ambition and it has been assumed that given the challenging economic conditions for coal, only two plants make the investment needed to meet the requirements of the EU's Industrial Emissions Directive and are therefore able to operate without constraint after 2020. In these circumstances all but one coal plants are projected to have closed by the end of 2023 due to economic factors.

Our modelling projections also take into account the EU Electricity Regulation[12] that requires that, from 4 July 2025 at the latest, existing capacity that emits more than 550g of CO2 of fossil fuel origin per kWh of electricity and more than 350kg CO2 of fossil fuel origin on average per

[10] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671959/FINAL_updated_unabated_coal_Impact_Assessment_Jan_2018.pdf

[11] https://www.gov.uk/government/collections/fossil-fuel-price-assumptions

[12] Regulation (EU) 2019/943 of the European Parliament and of the Council on the internal market for electricity https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2019%3A158%3ATOC&uri=uriserv%3AOJ.L_.2019.158.01.0054.01.ENG

year per installed kWe shall not be committed or receive payments or commitments for future payments under a capacity mechanism.

Our modelling projections suggest that there is likely to be 1.3GW of unabated coal capacity remaining by the time the emissions intensity limit is introduced on 1 October 2024, with all other unabated coal power stations taking closure decisions in the years ahead of that.

Two sectors that may be impacted by the earlier closure of coal-fired generation are the transport and coal mining sectors. Coal has historically accounted for a significant portion of rail freight activity and, to an extent, of port activity, but this has declined in the last few years and we expect this trend to continue. The phase out of unabated coal-fired generation would only accelerate this trend, and we also expect the increased activity anticipated from alternative technologies and new generation that will replace coal to potentially offset this reduction to a considerable degree.

The power sector is the major consumer of coal mined in the UK, however domestic demand for steam coal for power generation as well as domestic production have been steadily falling in recent years. Here as well we expect the phase out of unabated coal-fired generation to simply accelerate this downward trend already in existence. While there will be no demand for steam coal for power generation after either date, we however anticipate there will remain demand for coal in other sectors.

2.4 Summary of proposals

In summary, the Government proposes:

- To introduce legislation which will ban electricity generation from generating units which burn solid fossil fuels and emit more than a specified emissions limit of 450g of CO_2 per kWh in Great Britain from 1 October 2024.
- To require biomass CO_2 emissions to be calculated on a net life-cycle basis.
- To designate an Enforcement Authority with powers to verify compliance with the emissions intensity limit on an *ad hoc* basis.
- Not to introduce a 300MWth minimum threshold, nor introduce Secretary of State powers to suspend/modify the new emissions limit in emergency circumstances.

Question 1: Do you have any comments on the Government's intention to bring forward the ban on unabated coal generation from 1 October 2025 to 1 October 2024?

Question 2: Do you have any comments on the proposed emissions intensity limit and its application? If you disagree with the proposal, please provide detailed reasoning.

What are your views on whether a 300MWth threshold is necessary to avoid unintended consequences on other forms of generation?

Question 3: Do you have any views on how net life-cycle CO2 emissions from biomass should be calculated?

Are you aware of any coal units which will facilitate co-firing of coal and biomass beyond 1 October 2024, or any other reason which would necessitate the introduction of additional arrangements for monitoring biomass co-firing emissions other than those described in the 'monitoring and reporting' section?

Question 4: Do you have any comments on the Government's intention not to legislate to give the Secretary of State the power to suspend/modify the emissions limit in emergency circumstances?

Question 5: Do you agree with our proposal to provide a designated Enforcement Authority with powers to verify compliance on an ad hoc basis?

Do you have any comments regarding monitoring and reporting arrangements that we should take into account? Please provide supporting evidence where appropriate.

Do you have a view on which enforcement powers should be introduced?

How to respond

This consultation will be open from 14 December 2020 until 26 February 2021. Please submit your response to this consultation by 11 pm on 26 February 2021. A summary of responses and our Government response will be published in due course after the consultation closes. When responding, please state whether you are responding as an individual or representing the views of an organisation. Your response will be most useful where it is framed in direct response to the questions posed, though further comments are also welcome.

The consultation is hosted on the online consultation portal Citizen Space and this is our preferred way for stakeholders to submit their responses to the consultation questions. There is a mandatory 'about you' section and it will not be possible to submit responses unless this section is completed. The questions can be answered in any order and, aside from the 'about you' section, respondents can answer as many questions as they choose. Each question has a corresponding open text box without a character or word limit. For each question, there is also the option to upload supporting material (e.g. graphs, charts). Responses can be copied and pasted into the text boxes from other software e.g. Microsoft Word or entered directly. Responses on the portal can be saved and returned to later. There is a PDF version of this consultation document available on the portal homepage for reference.

Consultation Portal: https://beisgovuk.citizenspace.com/energy-security/early-coal-closure

Alternative methods of responding to the consultation are available and include:

Email to: energy.security@beis.gov.uk

Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). **If you want the information that you provide to be treated as confidential please tell us in your response to the consultation but be aware that we cannot guarantee confidentiality in all circumstances.** An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request. We will process your personal data in accordance with all applicable UK and EU data protection laws. See our privacy policy.

We will summarise all responses and publish this summary on GOV.UK. The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

Quality assurance

This consultation has been carried out in accordance with the government's consultation principles. If you have any complaints about the way this consultation has been conducted, please email: beis.bru@beis.gov.uk