



Department
of Energy &
Climate Change

The Rt Hon Amber Rudd MP
Secretary of State

Department of Energy & Climate Change
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13 July 2015

RE: Petition Entitled: The White Rose "CCS" project: Why its "carbon capture" plans are doubtful and why public subsidies should not be spent on Drax's new "White Elephant"

Thank you for your petition on 18 June regarding the plans to build a new Carbon Capture and Storage ("CCS") power station at Drax Power Station in West Yorkshire and the use of public funding.

CCS has the potential to play an important role in decarbonising power (including the potential for negative emissions electricity generation using biomass), Energy Intensive Industries and in enabling hydrogen generation for potential use in transport and syngas (hydrogen, carbon monoxide, and carbon dioxide) for heat. CCS also offers the potential for flexible generation, especially important in a future energy mix dominated by inflexible or intermittent generation and the opportunity to continue to utilise indigenous fossil fuel resources in the UK. Governments of developed economies throughout the world have programmes in place to help bring forward CCS as a commercially deployable technology.

In the UK, unabated coal-fired power stations currently provide around a third of our electricity needs, but these plants are reaching the end of their economic life. The Government has acted to prevent new unabated coal generating stations being built in the UK without at least 300MW of CCS and an Emissions Performance Standard limits carbon emissions of electricity generation from new power stations to around half that produced by unabated coal.

If CCS can be demonstrated as a cost effective source of low carbon generation in the UK then it is likely to contribute to economic growth as well as in the facilitation of a competitive energy mix and the cost effective achievement of climate change objectives.

CCS Commercialisation Programme

The UK CCS Commercialisation competition is a key part of the Government's contribution to the worldwide effort to demonstrate CCS as a cost effective carbon abatement technology. The competition makes available up to £1 billion in grant together with operational support through a low carbon Contract for Difference (CfD). Two projects are currently being supported to undertake detailed design and we expect the developers to decide whether they wish to proceed with their projects at the end of this year with Government to decide shortly after whether to provide the additional support required. This decision may result in both, one or none of the projects being offered further support.

If the White Rose Project is successful it will only receive CfD payments for the carbon free electricity it produces. The decision to put forward a new power station was one made by the White Rose consortium, not Government. However, it is generally accepted that the challenge of retrofitting CCS to any of the UK's existing coal stations – which are inefficient by modern standard – are particularly challenging.

Planning Procedure

Both the White Rose and Peterhead projects are large infrastructure projects. Planning in Scotland for Peterhead is a wholly devolved matter. White Rose, as it is situated in England, is a Nationally Significant Infrastructure Project (NSIP) for which development consent from the Secretary of State is needed under the Planning Act 2008. For any NSIP, an Examining Authority from the Planning Inspectorate will examine the project on behalf of the Secretary of State. Once the examination has closed the Examining Authority will have up to three months to make a recommendation report to the Secretary of State about whether or not to grant development consent.

If you wish your views on an application to be taken into consideration you should, if you have not already done so, provide your views about the application to the Examining Authority during the examination period. Please be aware that if you have not formally registered to become an interested party for the purposes of the examination of an application, the Examining Authority has the discretion to accept written submissions and hear oral submissions from individuals and organisations who are not interested parties.

If the Examining Authority accepts any submission you wish to make during the examination period then it will be published on the relevant National Infrastructure project page of the Planning Portal website and included in the Report to the Secretary of State along with the representations and submissions made by interested parties and others during the examination.

Further information and advice about how to participate in the examination of this application can be obtained from the Planning Inspectorate by calling 0303 444 5062 or emailing: NIenquiries@pins.qsi.gov.uk. The Planning Inspectorate also has a range of Advice Notes about the national infrastructure application and examination process on the National Infrastructure pages of the Planning Portal Website at: <http://infrastructure.planningportal.gov.uk/>.

The Secretary of State cannot intervene in the examination of an application before the examination has closed or before the recommendation report has been submitted as this would risk prejudicing the Examining Authority's impartial consideration of the application.

For the reasons given above and for the avoidance of doubt your petition to the Secretary of State has not been passed to the Examining Authority that is examining this application.

Biomass

As your petition identifies one of the options being considered by the White Rose consortium is to co-fire with biomass. Generally CCS plants are expected to capture about 90% of the carbon dioxide that would otherwise be emitted to the atmosphere, but co-firing biomass would enable the plant to be carbon dioxide emission free. Biomass, when sourced sustainably, can provide a cost-effective, low carbon and controllable source of renewable energy. Any biomass used by a unit generating under CfD must comply with government's sustainability criteria:

- The UK government is bringing in mandatory sustainability criteria later this year for woody biomass used to generate electricity under the Renewables Obligation and under the CfD. Should the White Rose plant co-fire with woody biomass, it will be required under its CfD contract, to comply with this stringent sustainability criteria.
- These criteria will require biomass power generating stations to achieve a minimum of 60% greenhouse gas (GHG) lifecycle savings against the average EU fossil electricity grid intensity; this represents a saving of at least 69% compared to electricity generated from coal.
- The criteria also requires that woody biomass is sourced from sustainably managed forests, in line with the Government's own Timber Procurement Policy – wherever in the world the timber is from. These criteria take into account a range of social, economic and environmental issues including protecting biodiversity, land use rights, sustainable harvesting and regeneration rates. Alongside this, the EU Timber Regulation (EUTR) makes it illegal to place illegally logged timber on the European market. Together, these legality and sustainability requirements counter the use of fuels derived from deforestation being used in the UK.

I will be publishing this letter on my department's webpages at:

<https://www.gov.uk/government/organisations/department-of-energy-climate-change>.

Yours sincerely,



AMBER RUDD