

The Rt Hon Edward Davey MP
Secretary of State
Department of Energy and Climate Change
3 Whitehall Place
London
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30th November 2012

Dear Edward

I am writing on behalf of the Committee on Climate Change in response to your consultation on proposals to enhance the sustainability criteria for the use of biomass feedstocks under the Renewables Obligation.

In our 2011 Bioenergy Review we highlighted the risks associated with the use of unsustainable biomass to meet renewable energy targets and carbon budgets. For example, emissions associated with biomass from felling whole trees are often in excess of those from the use of coal.

This risk is more pronounced because of the limited accounting for forest biomass feedstock related emissions under the Kyoto Protocol and the EU Renewable Energy Directive, as well as continuing scientific uncertainty over total biomass lifecycle emissions.

We therefore highlighted the importance of putting in place safeguards to ensure that the use of biomass results in genuine emissions reductions.

In particular, we recommended that the threshold for the use of biomass under the Renewables Obligation should be tightened to 200 gCO₂/kWh from the previously proposed level of 285 g/kWh. This would represent a significant saving relative to fossil-fuel fired generation, whilst also providing a margin for emissions from possible indirect deforestation (i.e. due to displacing demand from other wood consuming industries).

However, under the current consultation proposals, there could be a large amount of converted coal plant burning biomass at levels of 240 gCO₂/kWh or above to 2025 (i.e. much higher than the average grid intensity, which we expect to be reduced to around 150 gCO₂/kWh by 2025).

It is the strong view of the Committee that the proposed standard does not go far enough, and that a 200 gCO₂/kWh standard should be set following an initial transition period, in order to ensure that use of biomass results in reduced rather than increased emissions.

We therefore urge that you include a 200 gCO₂/kWh standard from 2020 onwards in the final biomass sustainability criteria.

Yours sincerely

A handwritten signature in black ink, appearing to read "Deben", with a horizontal line underneath.

Lord Deben, Chairman