

Changes to Renewables Obligation (Scotland) Order

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Green Alternatives to Incineration in Scotland

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

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Forename

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION – ISSUES AND QUESTIONS

Other than the exceptions as set out in this document, do you agree that the Scottish Government should amend its bands and legislation in line with the proposals for the rest of the UK? If not, please explain where Scotland should differ and why (providing evidence as necessary).

Scotland should differ from UK ROC legislation for the following reasons (N.B. I use the term 'waste incineration' as it is defined in the Waste Incineration Directive, i.e. as including gasification and pyrolysis):

1. ***Waste incineration should receive no ROCs, for the following reasons:***
 - a) *ROCs for waste incineration undermine efforts to reduce, reuse and recycle* – The fundamental problem with ROCs is that they only apply to energy *generated*, not energy *saved*. Friends of the Earth calculate that recycling saves on average 4 times more energy than the amount generated by incineration. Therefore recycling should receive 4 times higher subsidies than incineration. In reality it doesn't receive any subsidy apart from some initial help with capital costs. That is why companies are queuing up to build waste incinerators, but nobody wants to build recycling plants.
 - b) *Failure to consider 'legacy' co2* – Making the products in a typical tonne of rubbish requires the energy equivalent to 10 barrels of oil. Incineration recovers only a tenth of this. This has a direct bearing on global warming, because 74% of man-made co2 emissions come from energy production. Making the products in a tonne of rubbish generates 3 tonnes of co2. By handing out generous subsidies to burn/incinerate those products, the Government is encouraging manufacturers to forget about this legacy co2. However the planet does not forget.
 - c) *Cost* – Waste incineration/gasification is very expensive. The latest Gate Fees Report indicates that it is just as expensive as MBT, which is one of the main reasons why Lancashire County Council has rejected incineration altogether.
2. ***Failure to distinguish between biogenic and fossil derived waste*** – Much of the material that the waste industry wishes to burn is fossil-derived plastic. If the Government insists on subsidising incinerators, its RO Order must stipulate that ROCs will be limited to the proportion of energy produced from biogenic waste.
3. ***Gasification should not be given ROCs until it is a proven technology*** – In a report published in October 2011, the Department of Energy & Climate Change describes gasification as: “. . . emerging and unproven technologies for the treatment of waste biomass and mixed municipal waste where there are number of technical issues to resolve, for example, achieving intended throughput and air emission standards.”ⁱ In fact there is only one working example of a waste gasifier in the UK, on the Isle of Wight. Due to its unreliability (it was closed for most of 2010 due to excessive dioxin emissions) the local Council has decided to look for alternative solutions.

Do you agree with our proposal to set enhanced band for both wave and tidal stream generation at 5 ROCs?

Yes

What are your views on the need for a capacity threshold to apply in conjunction with the enhanced wave and tidal ROC rate? If there is such a need, should the threshold apply at an aggregated level or to individual projects?

No comment

What are your views on our proposal not to incentivise new large scale dedicated biomass electricity? Under which circumstances would it be appropriate to set a threshold for electricity only generation? At what level should any threshold be set?

We strongly approve of your proposal not to subsidise big biomass. Clearly shipping huge quantities of timber from all over the world cannot be environmentally friendly. Any new biomass CHP plant should be limited to a capacity for which waste wood can be sourced locally, and will not push up the costs of board manufacturers and other wood users.

What are your views on:

- **whether or not our incentives under the ROS in Scotland should mirror the UK Government's proposals on enhanced co-firing and conversion?**
- **whether a maximum threshold for biomass CHP plants is required?**
- **the continued appropriateness of the 90% biomass content threshold?**

No comment

What are your views on the proposals as published for governing transition between the RO and its proposed replacement? Do you believe that there are particular issues as far as Scottish projects are concerned, and which might justify a different approach?

No comment

We would also be grateful to hear your views on the existing proposals for grace periods, and whether there are any additional circumstances or approaches which we should consider.

No comment

ⁱ Department of Energy & Climate Change, Consultation on proposals for the levels of banded support under the Renewables Obligation for the period 2013-17 and the Renewables Obligation Order 2012, s12.2 - <http://www.decc.gov.uk/assets/decc/11/consultation/ro-banding/3235-consultation-ro-banding.pdf>