

Rocpower - proposed Biofuel Power Generation Plant, Whaley Road, Baraugh Green, Ref 2009/1539 - objection letter from Helena Paul, London NW6 1TS, phone: 0207 431 4357, h.paul@gn.apc.org

I am writing to object to the new planning application from Rocpower Ltd to build a 7 MW biofuel power station at Baraugh Green, which would burn about 10,000 tonnes of vegetable oil every year.

Air quality issues remain a concern – higher smokestack is not a solution

I realise your situation is extremely difficult, but urge you to take a lead and reject this application. Biofuel power stations are no solution to our demand for energy. I also understand that local air quality issues are key ones for you, rather than global biodiversity and climate change. Air quality issues are indeed extremely serious and we should not add to our existing problems of air pollution and rising rates of asthma, etc with additional nitrogen oxide, PAH, PM10 and PM 2.5, which contribute to extra particulate levels, black soot and acid rain. I was struck by information about the Rocpower Wakefield installation, which apparently attracted complaints, immediately after it was opened, about air quality impacts. Proposing to raise the height of the smokestack in the current application reminds me of exercises to extend sewage pipes further into the sea to avoid obvious sewage pollution close by. This is not a solution to the problem of pollution, but merely a displacement of it. It is possible that the consequences of raising the smokestack could be equally serious or found to be even more so and this should be investigated.

Market forces cannot be allowed to dictate the choice of fuel

The application says: "The exact choice of fuel will depend on market forces." In a time of extreme pressure on land, climate and biodiversity, this is simply unacceptable. We must find sources of fuel that cause least harm. However, we do not have the capacity to check all sources of biofuel through the supply chain. Claims that the EU will tackle the problem through sustainability criteria are not convincing. Such criteria would have to be monitored regularly, which is costly. Suppliers will in any case be able to forego rewards for reporting and import without submitting their supplies to scrutiny. As usual in commodity markets, cheaper biofuel is likely to be produced by reducing costs to the minimum, which in turn is likely to mean human rights violations, over-exploitation of resources such as soil, water and labour, contamination of soil and water with chemicals, expulsion of communities from their lands, and destruction of biodiversity, plus local climate change. I have already seen too many images of forest destruction for oil palm plantations.

Biofuels - destructive, subsidised fuels imported from other countries

All around Europe, companies are turning to biofuel and biomass imports for heat and power. This is not sustainable and I believe it poses a grave threat to future generations and to ecosystems worldwide. At present it is massively supported by subsidy, ie: the market is deliberately distorted, but you have to remember that this may well not continue into the future, especially as more evidence of the damage caused by biofuel crops comes to light. Biofuel production does not save as many carbon emissions as promoters like to claim. In addition, it requires large amounts of land and competes with food production. It is not even acceptable as an interim solution, because land, once converted from forest or wetlands, is rarely converted back to them and return to viable forest or wetland may be difficult and costly. Land in the tropics that is stripped of forest cover may rapidly turn to something very like a desert.

The production of all the potential vegetable oils for biofuel, whether palm, rapeseed or soya, has major costs for the environment and local people. The destruction of forests rapidly translates into a cost to all of us in terms of CO2 emissions and further de-stabilisation of the climate. I have spent some years studying the issues and it is clear to me that vegetable oil power stations are no solution to any of our problems. They are not an acceptable alternative source of electricity.

Palm oil – impacts on communities, forests, wetlands, peatlands

The problems with oil palm are better known than for the other products and they are extremely serious. A major issue to bear in mind is the fact that companies have to wait a few years after planting before they can exploit the product. Hence, most oil palm companies rely on logging to provide an income at first. They are not interested in using already cleared land. In addition, I have been very worried to see how palm oil, already causing problems in Ecuador and Colombia, is now being promoted for the largest remaining intact region of rainforest in the world, the North West Amazon, where the impacts on biodiversity and indigenous peoples could be terminal. It would likely have an effect on Europe and the US, as well as the Amazon region itself, causing changes to local climate and rainfall patterns. See Peter Bunyard: Destruction of the Amazon Rain Forest Threatens Global Climate <http://www.bookrags.com/researchtopics/rainforests/09.html>

Soya products – destruction of forests, grasslands, communities, livelihoods

I have co-authored a study on soya monocultures in Argentina and I have seen the impacts of soya production for myself. Not only are the GM soya monocultures destructive to the environment, soils, water sources, forests and local rainfall patterns, but the application of chemical herbicides and pesticides causes severe problems to local communities and wipes out biodiversity. People have been displaced from the land in their thousands and violent evictions have been frequent. The same kinds of problems are routinely reported for oil palm; I refer you to the latest alert from Rainforest Rescue about Wilmar, one of the largest producers of palm oil in the world, see: www.rainforest-rescue.org/mailalert

Soybean oil, as a by-product of the soyabean meal imported and fed to animals, may sound like a good way of ensuring full use of a product. However, it would likely stimulate further soybean planting which would lead to further destruction in Argentina, Uruguay, Paraguay, Bolivia and Brazil. Of course palm kernel and other co-products are also used as animal feed: in this way co-products can further stimulate destructive industrial monocultures of these crops.

Tall oil – by-product from another destructive industry

Tall oil is already problematic, as it is a by-product of the paper industry, with monoculture plantations, often of alien species such as eucalyptus and pine, worldwide. First of all, there is not any spare tall oil available to burn, and secondly, fractions of it, if available, should be converted into more valuable products, not simply burned. We need to be aware of the stimulus that co-products can provide to already unsustainable industries by adding other product streams and sources of profit as an incentive to expand them. We should not be turning to massive imports from around the world to run small power stations, yet Rocpower would do just this.

I firmly believe that plans such as Rocpower's are unsustainable from every point of view, including commercially and from the point of view of maintaining electricity supplies over even the medium term.