

**Debate Pack**

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# Sustainability of burning trees for energy generation in the UK

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## Summary

A Westminster Hall debate has been scheduled for Tuesday 6 December at 9.30am on the sustainability of burning trees for energy generation in the UK. The subject has been chosen by the Backbench Business Committee, and the debate will be opened by Selaine Saxby MP.

## What is bioenergy?

Bioenergy refers to the use of organic material (biomass) to make electricity, heat or fuels. This briefing focuses on biomass used to generate electricity, including prospects for combining with carbon capture and storage (so-called “power BECCS”).

Most woody biomass sourced for energy is a by-product or residue of forestry operations and forest industry.

There are concerns over whether burning wood for energy can be truly sustainable. Questions have also been raised over the carbon emissions generated by this practice, with many suggesting that current carbon accounting methods don’t accurately reflect the emissions it generates.

Additionally, poor forestry practices can result in the loss of habitat, depletion of carbon stocks and removal of old or pristine primary forests. In some regions this impacts the right, lives, livelihoods and cultural values of indigenous people and local communities.

## Government policy on bioenergy

The Government has previously said it would publish a new Biomass Strategy in 2022, which has not yet been published. It published a preliminary [Biomass policy statement](#) in November 2021. This reaffirmed the Government’s view that biomass has a role to play in delivering net zero. It noted that biomass is a vital but limited resource, and it set out principles to prioritise its use.

The [Biomass policy statement](#) said that in future, large-scale biomass electricity generation will need to be equipped with carbon capture and storage (so-called power sector bioenergy with carbon capture and storage, or “power BECCS”) in order to receive Government support. The Government held a [consultation on a proposed business model for power BECCS](#) from April to October 2022.

## Financial support for biomass-based electricity generation

Biomass-based electricity generation has been incentivised in the UK under the Renewables Obligations (RO), and in Great Britain under the Contracts for Difference (CfD) scheme and the Feed in Tariff (FIT). The supplier-led Smart Export Guarantee (SEG) also includes biomass generation.

The Government has said it only supports sustainable biomass use which can deliver genuine greenhouse gas emissions savings compared to fossil materials.

Ofgem, the energy regulator, is responsible for auditing the sustainability of biomass used by electricity generators which receive Government support.

# 1 Background

## 1.1 What is bioenergy?

Bioenergy refers to the use of organic material (“biomass”) to make electricity, heat or fuels. The original energy source is from the sun (solar energy), which creates organic matter through photosynthesis.

### Types of biomass

Different types of biomass are categorised as first, second or third generation feedstocks, as follows:

- First generation feedstocks: these are derived from edible biomass, such as oilseed rape, sugar beet, wheat and maize;
- Second generation feedstocks: these are derived from inedible biomass such as:
  - woody energy crops such as short rotation forestry and perennial crops like coppiced willow and grasses such as miscanthus;
  - agricultural and forestry residues such as cereal straw, manures and forest thinnings; and
  - wastes such as landfill gas, municipal solid waste, waste wood, poultry litter, abattoir waste and waste vegetable oils.
- Third generation feedstocks: these are derived from algae. These feedstocks are still at research stages.

### Applications of bioenergy

Bioenergy has many potential applications:

- Biomass can be burned or co-fired with other fuels (such as fossil fuels) to generate electricity or heat.
- Biomass can be converted to biomethane by anaerobic digestion, or to liquid or gaseous biofuels by thermochemical processes. These fuels can in turn be used in heating and transport.
- Bioenergy with carbon capture and storage (BECCS) is a system of technologies that combines using biomass for energy with the capture and permanent storage of the resulting carbon dioxide emissions. It is

called a ‘negative emissions’ or ‘greenhouse gas removal’ technology because it can remove greenhouse gases from the atmosphere. For more information on BECCS see the POST Note [Bioenergy with Carbon Capture and Storage](#).

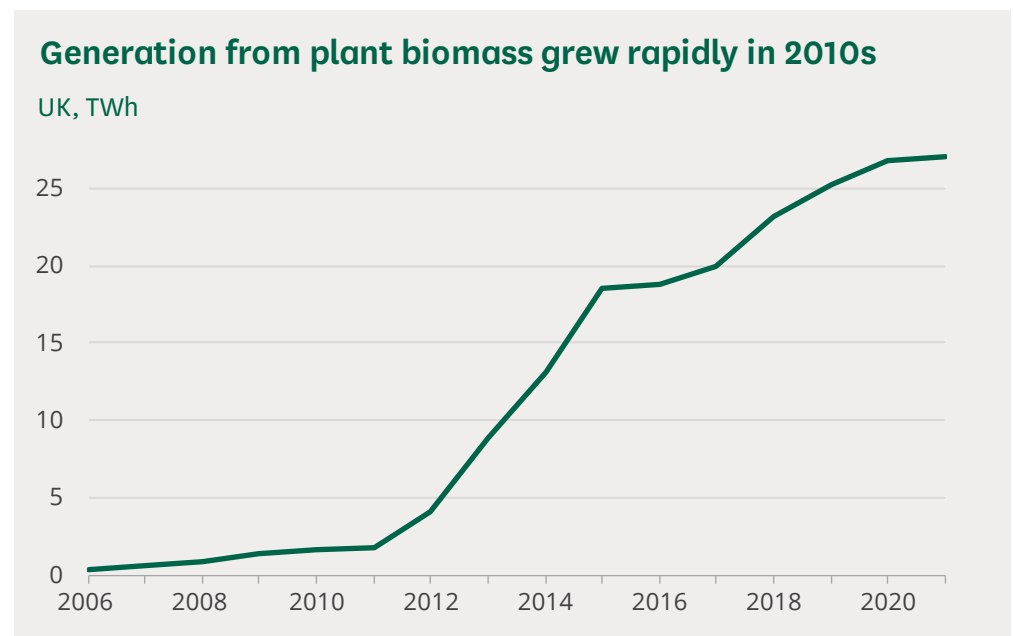
Whilst bioenergy has many potential applications, its use is limited by the availability of feedstocks and the land required to produce these.

It is also important to note that bioenergy is not homogenous, and its environmental impacts vary depending on the way the bioenergy is produced, processed, and used. This is covered in more detail in section 3 [on the Sustainability of biomass](#).

This briefing paper focuses on biomass used to generate electricity, including future prospects for electricity generation with BECCS.

## 1.2 How is bioenergy used for electricity generation in the UK?

The following chart shows the rapid growth of plant biomass generation from 2011 onwards. In 2011 it produced less than 2 TWh of power; 0.5% of UK generation. In 2021 this had increased to just over 27 TWh or 8.8% of UK generation.



Source: BEIS, [Energy Trends: UK Renewables \(Table 6.1\)](#)

Other data suggests that wood provided 91% of the energy from biomass combustion for power generation in 2020.<sup>1</sup>

The UK's biomass generation capacity is dominated by two power stations; Drax (2.6GW) and Lynemouth (0.4GW) which together made up 90% of biomass capacity at the end of May 2022.<sup>2</sup>

## Biomass imports

UK imports of plant biomass (defined in government statistics as wood pellets and wood briquettes) increased over the last decade on a similar scale to plant biomass generation. They were 1.0 million tonnes in 2011 and increased to 9.1 million tonnes in 2021. In 2021 most came from the US (60%) followed by Canada (16%) and Latvia (12%).<sup>3</sup> Imports made up 54% of the of plant biomass used in UK generation in 2021.<sup>4</sup>

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<sup>1</sup> NAEI, [UK Greenhouse Gas Inventory, 1990 to 2020: Annual Report for submission under the Framework Convention on Climate Change](#) (Energy background data)

<sup>2</sup> BEIS, [Digest of UK energy statistics 2022 \(Table 5.11\)](#)

<sup>3</sup> BEIS, [Digest of UK Energy Statistics: Renewable sources of energy \(Table 6.6\)](#)

<sup>4</sup> Net imports = gross imports minus gross exports. Source: BEIS, [Digest of UK Energy Statistics: Renewable sources of energy \(Renewable energy flowchart\)](#)

## 2 Bioenergy policy

### 2.1 Overarching policy on bioenergy

In December 2020 the Government announced it would publish a new Biomass Strategy in 2022. Not yet published, this will be the Government's first major strategy focussed on bioenergy since the [UK Bioenergy Strategy](#) (published in 2012) and the [Bioeconomy Strategy](#) (published in 2018 and withdrawn in 2021).

The Government held a [call for evidence](#) to inform the new Biomass Strategy in spring 2021, and it published a preliminary [Biomass policy statement](#) in November 2021.

Section 2.1 summarises recent key developments in the Government's overarching bioenergy policy. Section 2.2 provides information on policy for biomass-based electricity generation.

#### 1 Climate Change Committee (CCC) view on bioenergy

The CCC has said that bioenergy carbon capture and storage (BECCS) bioenergy will likely be necessary for the so-called 'negative emissions' aspects of the UK's net zero target. This is because it will be very difficult to reduce emissions to net zero in some sectors, such as agriculture and aviation.

'Negative emissions' technologies can serve to 'balance out' emissions which are extremely difficult, or impossible to reduce otherwise, by capturing carbon dioxide and storing it.

According to the CCC's 2019 [analysis of pathways for net zero](#), greenhouse gas removal technologies will be necessary to meet the UK's net zero target under any scenario. Bioenergy carbon capture and storage is expected to be necessary for this function.<sup>5</sup>

In its [2022 Progress Report to Parliament](#), the CCC gave an updated assessment of the potential role of biomass-based electricity generation with BECCS. It said that BECCS should be "deployed at scale rapidly" but would need to meet the "highest sustainability standards". It also advised that bioenergy **without** CCS should be "phased out rapidly across power

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<sup>5</sup> CCC, [Net Zero – The UK's contribution to stopping global warming](#), May 2019



generation", and that "CCS will need to be retrofitted to facilities already in operation".<sup>6</sup>

## Energy White Paper (December 2020)

The [Energy White Paper](#) set out the Government's plans to align the UK energy system with its target to reduce UK greenhouse gas emissions to 'net zero' by 2050.

It summarised the "unique" potential of biomass to support decarbonisation:

Biomass is unique amongst renewable technologies in the wide array of applications in which it can be used as a substitute for fossil-fuel based products and activities, from power generation to hydrogen production and even new forms of plastics. Along with its ability to deliver negative emissions, this makes biomass one of our most valuable tools for reaching net zero emissions.<sup>7</sup>

The Energy White Paper set out several Government commitments on bioenergy, notably:

- The Government would publish a new Biomass Strategy in 2022. It said this would include:
  - the results of a "review of the amount of sustainable biomass available to the UK, and how this resource could be best utilised across the economy" to achieve the 2050 net zero target;
  - an assessment of the UK's current biomass sustainability standards, including how and where they can be improved;
  - consideration of "the role biomass can play in delivering our wider environmental targets, including on air quality";
  - the role which BECCS [bioenergy carbon capture and storage] can play in reducing carbon emissions across the economy and [...] how the technology could be deployed"<sup>8</sup>

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<sup>6</sup> CCC, [Progress in reducing emissions: 2022 Report to Parliament](#) [PDF], 29 June 2022, p267

<sup>7</sup> HM Government, [Energy White Paper: Powering our Net Zero Future](#) [PDF], GOV.UK, 14 December 2020, p53

<sup>8</sup> HM Government, [Energy White Paper: Powering our Net Zero Future](#) [PDF], GOV.UK, 14 December 2020, p53

- The Biomass Strategy would be informed by a [new call for evidence on ‘biomass for net zero’](#), and the Government would publish a [preliminary position paper](#) by summer 2021.<sup>9</sup>
- The Government would “increase the proportion of biomethane in the gas grid”, and it would introduce a Green Gas Support Scheme to support this.<sup>10</sup>

(The [Green Gas Support Scheme](#) was subsequently launched on 30 November 2021.)

Regarding the potential of biomass for electricity generation, the Energy White Paper said:

[Bioenergy with carbon capture and storage] BECCS plants could deliver negative emissions [...] provided supply chain emissions are sufficiently low. There are a number of applications for BECCS across the economy, including clean hydrogen production, power generation, waste management and in heat for industrial processes and we need to ensure that it is deployed where it has the greatest value in reducing emissions.

For example, current support for electricity generation, which converted from coal to using biomass as a fuel source, expires in 2027. BECCS could provide a long-term future for this capacity.<sup>11</sup>

## Net Zero Strategy (October 2021)

The [Net Zero Strategy](#) set out policies and proposals to decarbonise all sectors of the UK economy to meet the 2050 ‘net zero’ target.

On biomass, it reiterated the Government’s previous commitments on publishing the Biomass Strategy and the Green Gas Support Scheme. It also noted that the use of biomass will need to be prioritised:

As set out in the IDS [[Industrial Decarbonisation Strategy](#)], current evidence strongly suggests that given limited sustainable biomass supply, we may need to prioritise the use of biomass where it can be combined with carbon capture and storage (BECCS), resulting in negative emissions.<sup>12</sup>

BECCS is one of two “engineered greenhouse gas removal” technologies proposed by the Strategy to achieve negative emissions<sup>13</sup>. The Strategy set an ambition to deploy at least 5 megatonnes of carbon dioxide per year (MtCO<sub>2</sub>

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<sup>9</sup> HM Government, [Energy White Paper: Powering our Net Zero Future](#) [PDF], GOV.UK, 14 December 2020, p53

<sup>10</sup> HM Government, [Energy White Paper: Powering our Net Zero Future](#) [PDF], GOV.UK, 14 December 2020, pp111-112

<sup>11</sup> HM Government, [Energy White Paper: Powering our Net Zero Future](#) [PDF], GOV.UK, 14 December 2020, p53

<sup>12</sup> HM Government, [Net Zero Strategy: Build Back Greener](#) [PDF], GOV.UK, 19 October 2021, p128

<sup>13</sup> The other proposed engineered greenhouse gas removal technology is direct air carbon capture and storage (DACCS).

/year) of engineered greenhouse gas removals by 2030.<sup>14</sup> It also set out indicative timelines for the development of BECCS for electricity generation:

By 2030 we envisage significant deployment of mature BECCS technologies [...]. BECCS technologies will include retrofit applications in the power and industry sectors. BECCS applications in the power sector could be deployed by the late 2020s, and potentially achieve ambitious contributions to our NDC target by 2030.<sup>15</sup>

More generally, the Strategy presented an “indicative delivery pathway” for the sixth carbon budget (covering the period 2033 to 2037), with expectations for the electricity sector, domestic biomass feedstocks and BECCS, amongst other areas:

By 2035, all our electricity will need to come from low carbon sources, subject to security of supply, moving to a fully decarbonised power system whilst meeting a 40-60% increase in demand. Expected residual emissions will be limited to CCUS plants, unabated gas, and energy from waste

[...]

By 2035, perennial energy crop and short rotation forestry can contribute significantly to carbon sequestration, with potential to support power, fuel supply, industry, and transport through BECCS and generation of biofuels.

[...]

Deployment of BECCS and DACCS [direct air carbon capture and storage] [will be] dependent on development of UK CCUS infrastructure and the availability of suitable, sustainable, and low-cost biomass feedstocks.<sup>16</sup>

## Biomass policy statement (November 2021)

The Government held a call for evidence on [Biomass in net zero](#) from April to June 2021. It published its preliminary [Biomass policy statement](#) on 4 November 2021, which built on responses received to call for evidence. The Statement was presented as part of a “a conversation” to inform the development of the Biomass Strategy.<sup>17</sup>

The Biomass Policy Statement reaffirmed the Government’s view that biomass has a role to play in decarbonisation and noted that it is a vital but limited resource. It set out a series of principles to prioritise the use of biomass:

In this policy statement Government provides a strategic view on the role of biomass across the economy in the medium- to long-term. We set out key principles we have established for the biomass priority use framework for the

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<sup>14</sup> HM Government, [Net Zero Strategy: Build Back Greener](#) [PDF], GOV.UK, 19 October 2021, p28

<sup>15</sup> HM Government, [Net Zero Strategy: Build Back Greener](#) [PDF], GOV.UK, 19 October 2021, p189

<sup>16</sup> HM Government, [Net Zero Strategy: Build Back Greener](#) [PDF], GOV.UK, 19 October 2021, pp78-79

<sup>17</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#) [PDF], GOV.UK, 4 November 2021, p44

short- (2020s), medium- (by 2035) and long-term (by 2050) to deliver towards net zero. Key principles across these timelines include:

- compliance with sustainability criteria and waste hierarchy principles;
- contribution to carbon budgets and net zero considering feedstock availability, life-cycle greenhouse gas emissions, and cost-benefits; and
- biomass to be used with carbon capture utilisation or storage where feasible, otherwise used only in hard-to-decarbonise sectors with limited or no low carbon alternatives.<sup>18</sup>

The statement identified areas where the biomass use could be expected to be prioritised according to these principles. These included the delivery of negative emissions through BECCS, as well as aviation, industry, hydrogen production and as a replacement for fossil fuels in the manufacture of valuable products.<sup>19</sup>

### Stakeholder reaction

The publication of the Biomass Policy Statement received little media coverage, other than from some specialist publications such as [Bioenergy Insight](#) and [Biomass Magazine](#), and a [blog by Business Green](#).<sup>20</sup> This may be because it was published on the COP26 Energy Day, a crowded time for energy and climate change news stories.

[Dr Nina Skorupska, CEO of the Association for Renewable Energy and Clean Technology \(REA\)](#) welcomed the statement and the Government's commitment to the use of biomass:

The REA firmly welcomes the Government's reasserted policy commitment to the use of biomass in the UK, recognising the critical role bioenergy plays in delivering the 1.5°C Paris Agreement and the UK's own Net Zero targets. Releasing this Policy Statement on COP26 Energy Day sends a clear signal that the UK remains committed to ensuring that biomass is done right, in line with existing stringent sustainability governance arrangements, both at home and internationally.<sup>21</sup>

The [CEO of Drax Group, Will Gardiner](#), also welcomed the policy statement, stating that it would help "attract the private sector investment needed for more green technologies to be deployed". Drax Group is the owner of Drax Power Station, the UK's largest biomass-based electricity generator:

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<sup>18</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#) [PDF], GOV.UK, 4 November 2021, p5

<sup>19</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#) [PDF], GOV.UK, 4 November 2021, p5

<sup>20</sup> Bioenergy Insight, [REA, Drax welcome UK Biomass Policy Statement](#), 4 November 2021; Biomass Magazine, 4 November 2021; Business Green, [COP26 Live Blog: Can the Glasgow Summit actually 'consign coal to history'?](#), 4 November 2021

<sup>21</sup> REA, [REA WELCOMES BIOMASS POLICY STATEMENT](#), 4 November 2021

We are pleased the UK government is demonstrating climate leadership in its ambitions to deliver policies which will attract the private sector investment needed for more green technologies to be deployed, including bioenergy with carbon capture and storage (BECCS).

With the right business model from the government, Drax is ready to invest £2bn in BECCS and could deliver the world's largest carbon capture project here in the UK, permanently removing eight million of tonnes of CO<sub>2</sub> from the atmosphere each year by 2030. With sustainable biomass and BECCS we can kickstart a whole new sector of the economy, creating and supporting tens of thousands of jobs in the North, as well as stimulating an export market and supporting the UK's net zero target.

We look forward to working with the government to ensure the most sustainable biomass feedstocks are used in our BECCS project.<sup>22</sup>

## 2.2

# Policy on biomass-based electricity generation

## Existing support for biomass-based electricity generation

The Government's primary mechanism for supporting new low carbon power infrastructure is the contract for difference (CfD) scheme. Contracts for Difference (CfDs) are awarded to large scale renewable energy generators at competitive auctions, known as allocation rounds (ARs).

CfDs work by guaranteeing a set price for electricity – known as a strike price – that generators receive per unit of power output. As the wholesale price of electricity fluctuates, the generator is either paid a subsidy, or pays back, so that they always receive the value of the strike price. The cost, or benefit, is passed on to consumer bills.

Further information on how the CfD scheme works is set out in the Library briefing [Support for low carbon power](#).

The technologies that have been able to compete for CfDs has changed over time. Dedicated biomass with combined heat and power (CHP) (as opposed to coal-to-biomass conversion) was eligible to compete in AR4, which was held between December 2021 and July 2022 (see the [round's budget notice \[PDF\]](#)). However, no contracts were awarded to biomass generators (see [CfD AR4 results \[PDF\]](#), July 2022).

The Government's [biomass policy statement](#) provided further information on the CfD and an overview of additional (current and past) support schemes for

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<sup>22</sup> Drax, [Drax Group CEO Will Gardiner responds to the Government's Interim Biomass Strategy](#), 4 November 2021

biomass such as the Renewables Obligation and the Smart Export Guarantee (SEG):

Biomass-based electricity generation has been incentivised in the UK under the Renewables Obligations (RO), and in Great Britain under the Contracts for Difference (CfD) scheme and the Feed in Tariff (FIT), while the supplier-led Smart Export Guarantee (SEG) also includes generation from biomass. The RO and the FIT is now closed to new entrants, while the CfD and the SEG are open for new applicants. In 2020 total electricity generation from bioenergy was 39.3 TWh, most of which was delivered by facilities supported under these schemes.

It summarised the sustainability requirements for the Contracts for Difference, and how emissions are reported under the scheme:

These schemes require generators to comply with land and GHG emissions related sustainability criteria. Generating stations report against the sustainability criteria on a monthly or quarterly basis (dependent on the scheme and project scale) and also provide an annual sustainability audit report to verify the sustainability information. Emissions are reported to the relevant parties, with the majority of schemes directly reporting this information to Ofgem, whilst all relevant information under the CFD is submitted to the Low Carbon Contracts Company who currently utilise Ofgem's expertise in this area as a technical advisor.<sup>23</sup>

In February 2022, BEIS announced that the fifth allocation round (AR5) would start in March 2023. It published a [landing page with documents relevant to AR5](#), including guidance and a consultation on changes to the CfD for AR5. None of these documents comment on whether biomass will be eligible for the round.

In response to a [parliamentary question on 23 September](#) (PQ 51988), the Government confirmed that the use of biomass for electricity is supported by the Contracts for Difference scheme, but it did not specify whether this support would continue in the future.

Drax currently receives support for its biomass electricity generation through [Contracts for Difference and the Renewables Obligation](#). It was one of eight projects to receive an "early contract" CfD, awarded without price competition, before the first allocation round, AR1 in 2014.<sup>24</sup> The Government responded to a [PQ about support received by Drax](#) each year from the CfD and the RO in January 2022.<sup>25</sup>

Ember, which campaigns against the classification of woody biomass as renewable, published [information on how much support Drax has received](#)

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<sup>23</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#), 4 November 2021, p22

<sup>24</sup> The [NAO reviewed the CfD's "early contracts"](#) in 2014. It found that while these had boosted confidence in the renewable industry and promoted the transition to electricity market reforms, they may also have increased costs for consumers

<sup>25</sup> PQ 103693 on [\[Drax Power Station: Subsidies\]](#), 21 January 2022

[through the Renewables Obligation and Contracts for Difference](#) schemes. It shows that Drax received a total of £893m in 2021 and £832 million in 2020 through Government schemes.

## Power sector bioenergy with carbon capture and storage (power BECCS)

Biomass-based electricity generation with carbon capture and storage is known as “power BECCS”.

The Government’s November 2022 [Biomass Policy Statement](#) recognised the potential of biomass to provide dispatchable or baseload power, which is needed to complement intermittent renewables such as wind and solar.<sup>26</sup>

It said the Government’s intention is that, in future, large-scale biomass electricity generation would need to be equipped with carbon capture and storage in order to receive Government support. This is in line with the recommendations made by the Climate Change Committee. However it also stated that no final decision has yet been made:

we will complete developing the priority use framework before making any decisions, including whether and what changes may need to be made to the CfD [Contracts for Difference] scheme beyond allocation round 4. Therefore, there are no current plans to change how we support biomass under the CfD.<sup>27</sup>

The Statement also recognised the role of small-scale biomass electricity generation in providing dispatchable and baseload power. It noted that these “may not have access to the CO<sub>2</sub> transport and storage infrastructure needed for CCS”. It said:

Any future changes to support for small-scale fuelled technologies under the CfD will depend on the priority use framework, any new information on the best use of the biomass, and the emergence of other government support schemes.<sup>28</sup>

## Power BECCS business models

In October 2021 BEIS published a report prepared by Element Energy and Vivid Economics on [business models to support power BECCS](#). The report said that because negative emissions currently have “little financial value”, policy

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<sup>26</sup> For more information on the services provided by different electricity technologies, see the Library briefing paper [Electricity grids](#).

<sup>27</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#) [PDF], GOV.UK, 4 November 2021, p22

<sup>28</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#) [PDF], GOV.UK, 4 November 2021, p23

would be required to make this technology “commercial viable”. It examined options for a new business model for power BECCS.<sup>29</sup>

Building on the October 2021 report, the Government held a consultation on its preferred position for a [business model to support the deployment of first-of-a-kind power BECCS projects](#) from 11 August to 7 October 2022. The proposed business model aims to incentivise both electricity generation and negative emissions.

The consultation noted there are barriers to investment and scaling-up power BECCS, as well as risks around the use of the novel technology. It sought views on “the main design elements of the business model and actions the government can take to enable deployment of this technology at scale, including steps to encourage the development of this industry, and address any possible barriers to investment”.<sup>30</sup>

The Government has not yet published its response to the consultation.

In the [accompanying press release](#), the then Secretary of State for BEIS, Kwasi Kwarteng said the Government was “fully behind” biomass energy and that the proposed reforms could create a new industry that would use “sustainable biomass in a way that absorbs harmful carbon dioxide from the atmosphere”.<sup>31</sup>

On the same day, the [Financial Times](#) reported that Kwasi Kwarteng had said it “doesn’t make sense” to import US-made wood pellets to be burnt for energy.<sup>32</sup> [ENDS Report](#) published an article exploring the contrast between the positions set out by Kwasi Kwarteng in the Government press release and the Financial Times article.<sup>33</sup>

### Call for first-of-a-kind power BECCS projects

On 24 August 2022 the Government launched a [call for prospective power BECCS projects that could be ready for deployment in the mid 2020s](#). The selected projects would be considered for its shortlist of first-of-a-kind projects to receive BECCS business model support.

The call is part of the Government’s “[cluster sequencing programme](#)” which aims to deliver a minimum of two carbon capture usage and storage (CCUS) clusters by the mid-2020s and four by 2030, with the support of the Government’s [Carbon Capture and Storage Infrastructure Fund](#).

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<sup>29</sup> Element Energy and Vivid Economics for BEIS, [Investable commercial frameworks for power-BECCS](#), GOV.UK, 19 October 2021

<sup>30</sup> BEIS and The Rt Hon Kwasi Kwarteng MP, [Government seeks to further improve diversity of energy supply by boosting biomass](#), GOV.UK, 11 August 2022

<sup>31</sup> Financial Times, [UK minister questions sustainability of Drax biomass fuel](#), 11 August 2022

<sup>32</sup> ENDS Report, [Energy secretary ‘questions sustainability of biomass’ while also saying the government is ‘fully behind biomass energy’](#), 11 August 2022

<sup>33</sup>



The call closed on 19 October 2022. The Government has not yet published its results.

## 2.3

### Research and innovation policy

The Government's biomass policy statement highlighted the need for further research into new biomass technologies to deliver net zero. It outlined that some of the funding under the [Net Zero Innovation Portfolio \(NZIP\)](#), a £1 billion fund to further low-carbon technologies, was allocated to biomass research, however it doesn't specify how much:

The Net Zero Innovation Portfolio (NZIP) is a £1 billion fund which will play a key role in enabling the UK to end its contribution to climate change by providing funding to accelerate the commercialisation of low carbon technologies, systems and business models in power, buildings, and industry sectors among others, with some funding streams relating directly or indirectly to the use of biomass. There are also a series of other existing and emerging UK government and UKRI funding opportunities that will address the challenges and evidence gaps related to the role of biomass in meeting net zero, and some are highlighted here.<sup>34</sup>

In August 2022, the UK Government announced that it was [providing £37 million](#) for biomass projects across the UK. It argued that this would support the growth of clean, renewable energy:

This government backing for innovation in biomass production will help support the government's plans to scale up and accelerate clean, renewable energy in the UK, to protect the UK's domestic energy security. Supporting trailblazing hydrogen BECCS technology will help further the government's ambition to see hydrogen as the clean super-fuel of the future, while also encouraging green investment into the UK and supporting the creation of new jobs.<sup>35</sup>

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<sup>34</sup> BEIS, [Biomass policy statement: a strategic view on the role of sustainable biomass for net zero](#), 4 November 2021

<sup>35</sup> Department for Business, Energy and Industrial Strategy (BEIS), [Press release: Renewable energy innovation boosted by £37 million government funding across the UK](#), 4 August 2022

## 3

# Sustainability of biomass

There are concerns relating to the sustainability of bioenergy. Biomass crops can either require the conversion of food producing arable land to biomass, or - directly or indirectly - can result in the conversion of natural ecosystems to arable land.

This can cause several issues. It can result in a trade-off between food security and fuel production. It can also have an impact on wildlife through habitat loss and fragmentation.

In some cases, issues such as the greenhouse gas emissions from clearing vegetation and the water demand for crops can limit the sustainability credentials of using biomass for energy.

## 3.1

# Sustainability criteria

In order to ensure that bioenergy is derived in a way that guarantees real carbon savings and protects biodiversity, sustainability criteria are used to identify sources of biomass that are suitable for bioenergy production.

The Government's 2021 call for evidence on the [Role of biomass in achieving net zero](#) recognised the need to update existing policy and reassess the role of biomass in supporting the UK's net zero target:

Biomass must be sustainable and deliver genuine GHG emission reductions. Sustainability standards are the main means through which we set the sustainability requirements that biomass must meet before its use is supported. These requirements are intended to ensure that any supported biomass delivers GHG emissions reductions and limit any negative impacts on the environment, including on land use and biodiversity.<sup>36</sup>

The consultation summarised the current sustainability criteria for bioenergy relevant to power generation (which are set out in the 2012 Bioenergy Strategy).

For woody biomass, the land criteria include requirements to protect soil, water, biodiversity, and ecosystems, maintain the productivity of the area and have regard to traditional rights of tenure and land use. They also set out that the forest, or land, must be managed in a way that is consistent with the Forest Europe Sustainable Forest Management Criteria, or a set of similar international principles. For non-woody biomass and biofuels the criteria protect, among other things, primary forest, highly biodiverse grassland, wetland and peatland.

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<sup>36</sup> Defra, [Role of biomass in achieving net zero: call for evidence](#), April 2021

The consultation said that the UK went further than the EU's established sustainability criteria, but criteria varied between sectors. However, schemes seeking Government support have to demonstrate that they meet the Government's sustainable criteria.

There are different Government support schemes for bioenergy use in different sectors and to some extent the sustainability criteria vary from scheme to scheme. The key requirement across all schemes is that operators seeking Government support for the production, supply or use of bioenergy must demonstrate they meet the sustainability criteria on a consignment basis, or within a certain application time period, and provide independent audit reports. Operators are not supported where they cannot demonstrate they meet the sustainability criteria set out in the relevant support scheme.<sup>37</sup>

The call for evidence went on to state it was assessing whether "updates are needed" for the UK sustainability criteria. The Climate Change Committee (CCC), who advise the Government on decarbonisation, has previously reported that there are gaps in sustainability criteria. In the 2018 report, [Biomass in a low-carbon economy](#), the CCC stated:

The evidence suggests that the UK's bioenergy sustainability rules (produced by Ofgem and DfT) are helping to limit the sustainability risks, although there is some evidence of negative local impacts (e.g. air quality), intensive forestry management practices, and disagreement around the use of some feedstocks (e.g. low-grade wood and 'thinnings'). Strengthened governance is needed to manage the risks to sustainable low-carbon production as the global biomass market scales up, and for any new public subsidies.<sup>38</sup>

The consultation closed in June 2021. In October 2022, the Government stated that responses to the consultation were "feeding into recommendations for further strengthening of the UK's already stringent biomass sustainability criteria, which we will set out in the forthcoming Biomass Strategy".<sup>39</sup> This strategy has not yet been published.

Responding to a parliamentary question on the financial and environmental impact of importing wood pellets for energy, the Government stated in October 2022 that it only supports sustainable biomass and highlighted Ofgem's role in ensuring this:

The UK only supports sustainable biomass use which can deliver genuine greenhouse gas emissions savings compared to fossil materials. The regulator Ofgem is responsible for auditing the sustainability of biomass used by electricity generators which receive support under the Renewables Obligation. Ofgem routinely checks whether the sustainability criteria have been met by generators.<sup>40</sup>

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<sup>37</sup> HM Government, [Role of biomass in achieving net zero](#), April 2021, p21-22

<sup>38</sup> HM Government, [Role of biomass in achieving net zero](#), April 2021, p22

<sup>39</sup> [UIN 64271](#), 20 October 2022

<sup>40</sup> [UIN 59827](#), 18 October 2022

## 3.2 Carbon accounting

Carbon accounting attempts to measure the greenhouse gases (GHGs) that an activity or business produces. Burning biomass produces carbon emissions, however, the GHGs from burning biomass are not included within estimates of emissions from power generation.

A POST Note on [bioenergy with carbon capture and storage](#) provides an overview of the limitations and factors affecting carbon accounting:

Biomass at maturity, on a given area of land, is known as a carbon stock. Plants still actively storing CO<sub>2</sub> (including even mature forests) are referred to as carbon sinks.

CO<sub>2</sub> emissions from burning biomass are counted as 'zero' in the energy sector to avoid double-counting, because carbon loss from harvesting plants is counted in the land sector. The carbon accounting in the two sectors are not linked and has led to the widespread perception that bioenergy is always 'carbon neutral'. In reality, net emissions from bioenergy can be substantial depending on their carbon cycle. Dedicated energy crops have short carbon cycles (<2 years) so the CO<sub>2</sub> emitted upon combustion can be re-sequestered by crop regrowth. For forests, however, regrowth is much slower. The time needed to offset the carbon emitted from bioenergy combustion depends on several factors:

- The nature of the feedstock (and if it is regrown)
- The carbon stock of the land before harvesting (initial carbon debt)
- Indirect land use change emissions
- Bioenergy supply chain emissions (such as transportation).

The point at which this carbon debt will be paid back is called the carbon payback period (or carbon break even time). This amount of time can vary from one or two years (marginal land, dedicated woody crops) to more than hundreds of years (wood from mature natural forests).<sup>41</sup>

Gross emissions of CO<sub>2</sub> from biomass burning are recorded under international guidelines, but only as a 'memo' item and not included in national totals. In 2020 the UK's emissions directly from burning (animal and plant) biomass for power generation were estimated at 24.6 million tonnes of CO<sub>2</sub> compared to 50.9 million tonnes from burning fossil fuels for power.<sup>42</sup>

A [briefing by researchers at the University of Birmingham](#) published in October 2021 looks at the current carbon accounting methods in the UK. It

<sup>41</sup> POST, [Bioenergy with carbon capture and storage](#), 6 March 2022

<sup>42</sup> NAEI, [UK Greenhouse Gas Inventory, 1990 to 2020: Annual Report for submission under the Framework Convention on Climate Change](#) (Table 1.A(a) 2020)

highlights how this can fail to capture the full carbon emissions for a particular business or its activities:

... most organisations and individuals have no robust definition of ‘net zero’ at all. For instance, businesses often define net zero without including their historic GHG emissions or the current emissions incurred in any raw materials they use, their existing assets, business investments, purchase of new technology and any GHGs emitted after a product is sold. Net zero benchmarks in current corporate reporting protocols for GHG emissions, such as DEFRA’s 2019 GHG reporting protocols or the Stock Exchange listing requirements, are incomplete and if used inappropriately systematically distort the representation of corporate GHG emissions and any decisions where they are used.<sup>43</sup>

The energy think tank [EMBER's 2022 article on Drax power station](#) also questions current carbon accounting approaches. It argued that using woody biomass for power “is not effective in mitigating climate change”:

Biomass generation is still considered as carbon neutral in UK law – but a growing weight of scientific evidence has overturned this assumption. The [European Academies Sciences Advisory Council \(EASAC\) now states that using woody biomass for power](#) “is not effective in mitigating climate change and may even increase the risk of dangerous climate change.” The Climate Change Committee recommends the UK moves away from using biomass for power without CCS [carbon capture and storage] – and yet biomass use is increasing in the UK power sector, and in 2021 [generated 12.8% of UK electricity](#) (12.4% in 2020; 11.6% in 2019).<sup>44</sup>

Concerns have been raised due to the time lag between emissions being produced through electricity generation and the equivalent amount being reabsorbed from the atmosphere.

This was [explained in a Scientific American article](#) from 2018 which said that “burning biomass for energy releases large amounts of carbon into the atmosphere all at once. But depending on the type of tree, forests may take decades or even a century to draw the same amount of carbon back out of the air”.

A report by the EU’s [Joint Research Centre](#) published in 2021 on [The use of woody biomass for energy production in the EU](#), concluded that conversion of primary forest to plantation (after felling) did not contribute to short term emissions reduction and carried high risks for biodiversity.

The policy institute Chatham House has published a series of briefings in 2017-18 examining [The Environmental Impact of the Use of Biomass for Power and Heat](#). It argued that:

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<sup>43</sup> University of Birmingham, [Why current carbon accounting methods threaten to undo UK plans for net zero and a Green Industrial Revolution](#), October 2021

<sup>44</sup> EMBER, [Subsidies for Drax biomass](#),

- In assessing the climate impact of the use of woody biomass for energy, changes in the forest carbon stock must be fully accounted for. It is not valid to claim that because trees absorb carbon as they grow, the emissions from burning them can be ignored.
- Along with changes in forest carbon stock, a full analysis of the impact on the climate of using woody biomass for energy should take into account the emissions from combustion and the supply-chain emissions from harvesting, collection, processing and transport.
- The provision of financial or regulatory support to biomass energy on the grounds of its contribution to mitigating climate change should be limited to those feedstocks that reduce carbon emissions over the short term.<sup>45</sup>

Independent [research carried out on behalf of the Environment Agency](#) (PDF) looked at the GHG emissions from producing and using biomass to generate electricity and heat compared with using coal and gas. It concluded that burning biomass for fuel generally produces fewer GHGs than fossil fuels. However, it went on to say that:

Emissions vary widely between different fuels and for the same fuel depending on whether good practice is followed. If certain land use changes occur, these can negate any savings made.<sup>46</sup>

A detailed [review of the literature](#) in this area was conducted by Forest Research, the Research Agency of the Forestry Commission as part of the European Commission project on the Carbon impacts of biomass consumed in the EU.

It also highlights that “the variability in reported results for GHG emissions of forest bioenergy reflects many factors related to the forest bioenergy systems being studied and the methodologies applied in calculations.”<sup>47</sup> It listed a range of factors that affect forest biomass emissions, including:

- Geographical location and spatial scale.
- Productive potential of forests.
- Types of forest management intervention involved in producing additional forest bioenergy, e.g. any or all of additional thinning, additional felling, increased extraction of harvest residues, enrichment of growing stock for increased production.
- Whether additional harvesting in forest areas is for forest bioenergy as the sole product or as a co-product alongside material/fibre products.

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<sup>45</sup> Chatham House, [Woody Biomass for Power and Heat](#), June 2018

<sup>46</sup> Environment Agency, [Biomass: Carbon sink or carbon sinner?](#) (PDF), April 2009

<sup>47</sup> Mathews *Et al.*, [Review of literature on biogenic carbon and life cycle assessment of forest bioenergy](#), Final Task 1 report, EU DG ENER project ENER/C1/427, ‘Carbon impacts of biomass consumed in the EU’, May 2014

- Counterfactuals for forest management, i.e. how forest areas would have been managed if bioenergy consumption had not been increased, and what this would mean for the development of forest carbon stocks.<sup>48</sup>

A [briefing from the Environmental Paper Network](#) on the carbon accounting practices for biomass energy production contains further information. It argues that the “large scale use of forest biomass adversely affects climate, biodiversity, communities, and the transition to low carbon renewables”.<sup>49</sup>

### 3.3 Forestry management

According to a [briefing from the International Energy Agency \(IEA\)](#), “most woody biomass sourced for energy is a by-product or residue of forestry operations and forest industry”.<sup>50</sup> However, concerns have been raised over poor forestry practices that result in the loss of habitat, depletion of carbon stocks through deforestation.<sup>51</sup>

Broadcast on 8 October 2022, the BBC [Panorama programme, The Green Energy Scandal](#), highlighted that Drax purchased felling licences in British Columbia in Canada. The areas covered by these licenses were subsequently felled with campaigners claiming that primary forests had been felled.

Primary forest is forest that is either old or regenerated naturally. It is high in biodiversity and provides good carbon storage and sequestration. The UN’s Food and Agricultural Association describes it as forest where there is “no clearly visible indications of human activities and the ecological processes are not significantly disturbed”.<sup>52</sup>

[On 6 October 2022 Drax published a rebuttal](#) suggesting that the proximity of the sites shown in the program to roads was evidence that the area was not primary forest.<sup>53</sup>

Further details on the position of both Panorama and Drax can be found in an article from waste management website Resource [Drax Panorama investigation: What happened next?](#) published on 18 October 2022.

Forest Research (the research agency of the Forestry Commission) has published a [resource on biomass sustainability](#), which explains situations

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<sup>48</sup> as above

<sup>49</sup> Environmental Paper Network, [How a Carbon Accounting Problem is driving the Biomass Delusion](#), 28 June 2022

<sup>50</sup> IEA Bioenergy, [Is energy from woody biomass positive for the climate?](#) (PDF), January 2018

<sup>51</sup> Environmental Paper Network, [Position Statement on Forest Biomass Energy](#)

<sup>52</sup> FAO, [Global Forest Resources Assessment 2020](#) (PDF), 2018

<sup>53</sup> Drax, [A statement from Drax Group CEO, Will Gardiner on Drax’s biomass sourcing](#), 6 October 2022

where using forest biomass for energy can produce more GHGs than conventional fossil fuels:

If deforestation operations are used to produce fuel and no new growth is encouraged then carbon emissions will approach those of conventional fossil fuel systems – direct carbon dioxide emissions from producing 1MWh of heat energy from wood are roughly the same as for coal and significantly more than for oil and gas. If carbon stored in the soil of these forests is also burned as part of these clearance operations then higher emissions still would result. However, if forests were managed in this way, woodfuel suppliers and their customers would very soon run out of the raw material they are selling or use.

<sup>54</sup>

The [Environmental Paper Network briefing](#), highlights a series of other potential issues relating to the use of forest for energy. Citing the negative impacts of producing monoculture forests, degrading ecosystems and undermining the community rights and interests of indigenous people:

Conversion of forests and other ecosystems to industrial monoculture tree plantations for biomass is especially harmful entailing conversion of natural ecosystems and agricultural land with serious impacts on communities, natural ecosystems, food production, water availability, and the climate.

Demand for biomass, and escalating monoculture plantation establishment cited above, exacerbates conflicts over land and forest resources, including land grabbing. This threatens the rights, interests, lives, livelihoods and cultural values of Indigenous and tribal peoples and local communities as well as businesses relying on forest resources. The negative effects can also impact food security for the wider populace.<sup>55</sup>

## 3.4

### Committee inquiry into sustainable timber and deforestation

On 2 November 2022, the Environmental Audit Committee (EAC) took further oral evidence for its [sustainable timber and deforestation](#) inquiry, which opened in July 2022. The Committee heard evidence from Dr Alan Knight, Group Director of Sustainability at Drax Group, who Drax’s current practice of using wood for energy.

He said that their model was based on “residues from the timber industry” and that the company was not “going into forests and harvesting them for pellets”.

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<sup>54</sup> Forest Research, [Biomass sustainability](#)

<sup>55</sup> Environmental Paper Network, [How a Carbon Accounting Problem is driving the Biomass Delusion](#), 28 June 2022



[Defra's written evidence to the EAC](#) for the inquiry also supports biomass for power generation. It noted that in 2020 the UK used around 4 million tonnes of oil equivalent (mtoe) of woody biomass from domestic sources and around 4.3 mtoe of woody biomass from imports for renewable energy generation. The Department said that:

The Government requires that the sourcing and use of biomass comply with strict biomass sustainability criteria under support schemes, such as the Contracts for Difference, the Renewable Obligations, and the Domestic and Non-Domestic Renewable Heat Incentive. To receive financial support generators are required to demonstrate that woody biomass that derives from forests is sourced from areas that follow sustainable forest management practices, including requirements for the maintenance and replanting of the forest, and must demonstrate to the regulator that deforestation is not occurring in the areas the material is sourced from.<sup>56</sup>

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## 4 Parliamentary material

### 4.1 Committees

#### **Environmental Audit Committee, Sustainable timber and deforestation Inquiry**

##### **Oral evidence, HC 637**

- 9 November 2022

Witnesses Client Earth, Stockholm Environment Institute York, Global Witness, and We Mean Business Coalition

Published 14 November 2022

- 2 November 2022

Witnesses Drax Group, European Academies Science Advisory Council, and Aston University

Published 8 November 2022

- 26 October 2022

Witnesses Aston University, Drax Group, and European Academies Science Advisory Council

Published 31 October 2022

#### **Business, Energy and Industrial Strategy (BEIS) Committee, Decarbonisation of the power sector Inquiry**

##### **Oral evidence, HC 283**

- 22 November 2022

Witnesses Drax, Chatham House, REA, and Severn Wye Energy Agency

Committees Business, Energy and Industrial Strategy Committee

Published 24 November 2022

- 22 November 2022

Witnesses British Petroleum (bp), SSE Thermal, The Carbon Capture and Storage Association, and Ember

Published 24 November 2022

- 1 November 2022

Witnesses Renewable UK, Solar Energy UK, RWE Generation, and Marine Energy Council

Published 4 November 2022

- 1 November 2022

Witnesses National Infrastructure Commission, Energy Systems Catapult, Cornwall Insight, and Climate Change Committee

Published 4 November 2022

## 4.2

### PQs

#### Biofuels

**Asked by: Sharma, Mr Virendra | Party: Labour Party**

To ask the Secretary of State for Business, Energy and Industrial Strategy, pursuant to Answer of 17 October 2022 to Question [59578](#), what assessment his Department makes of the proportion of biomass that is generated sustainably.

**Answering member: Graham Stuart | Party: Conservative Party  
| Department: Department for Business, Energy and Industrial Strategy**

The Government only supports sustainable biomass and there are strict sustainability criteria. Suppliers must demonstrate to the regulator Ofgem that they have met the criteria and their evidence is independently verified.

Consequently only biomass that complies with stringent sustainability criteria is eligible for support.

14 Nov 2022 | Written questions | Answered | House of Commons | 82220

#### Drax Power Station: Timber

**Asked by: Long Bailey, Rebecca | Party: Labour Party**

To ask the Secretary of State for Business, Energy and Industrial Strategy, following the BBC Panorama report on 3 October, what recent assessment he

has made of the (a) environmental and (b) financial impact of burning imported wood pellets for energy at Drax power station.

**Answering member: Graham Stuart | Party: Conservative Party  
| Department: Department for Business, Energy and Industrial Strategy**

The UK only supports sustainable biomass use which can deliver genuine greenhouse gas emissions savings compared to fossil materials. The regulator Ofgem is responsible for auditing the sustainability of biomass used by electricity generators which receive support under the Renewables Obligation. Ofgem routinely checks whether the sustainability criteria have been met by generators.

Sustainability information is publicly available on Ofgem's website, with the latest dataset accessible

here: <https://www.ofgem.gov.uk/publications/biomass-sustainability-dataset-2020-21>. The forthcoming Biomass Strategy will set out recommendations for further enhancing the UK's stringent biomass sustainability criteria.

18 Oct 2022 | Written questions | Answered | House of Commons | 59827

### Carbon Emissions

**Asked by: Day, Martyn | Party: Scottish National Party**

To ask the Secretary of State for Business, Energy and Industrial Strategy, pursuant to his Answer of 1 April 2022 to Question 146696 on Carbon Emissions: Coal and Timber, what quantity of carbon dioxide emissions did the UK report internationally as a memo item for (a) Drax Group from the burning of wood in its power station and (b) all UK bioenergy production in the last 12 months.

**Answering member: Greg Hands | Party: Conservative Party  
| Department: Department for Business, Energy and Industrial Strategy**

Defra publish the Pollutant Release and Transfer Register to comply with the Kyiv Protocol requirements. For 2020, the most recent year with available data, the total carbon dioxide emissions from the Drax site in North Yorkshire were 14.3 million tonnes and the carbon dioxide emissions excluding biomass were 1.53 million tonnes. This implies that burning wood at the Drax power station emitted 12.8 million tonnes of biomass derived carbon dioxide.

The quantity of carbon dioxide emissions from biogenic sources that the UK reported internationally to the United Nations Framework Convention on Climate Change for 2020 was 47.198 million tonnes.

01 Jul 2022 | Written questions | Answered | House of Commons | 23778

### Carbon Emissions

**Asked by: Hobhouse, Wera | Party: Liberal Democrats**

To ask the Secretary of State for Environment, Food and Rural Affairs, what estimate he has made of the amount of PM 2.5 emissions that has been produced by the (a) manufacturing and combustion sector as a whole, (b) burning of all types of biomass and (c) burning of wood pellets for energy.

**Answering member: Jo Churchill | Party: Conservative Party  
| Department: Department for Environment, Food and Rural Affairs**

Emissions of key air pollutants, including PM2.5, are compiled and reported by Defra on an annual basis through the National Atmospheric Emissions Inventory. The latest data is available to view at <https://naei.beis.gov.uk/data>.

09 Jun 2022 | Written questions | Answered | House of Commons | 9950

### Biofuels: Subsidies

**Asked by: Hobhouse, Wera | Party: Liberal Democrats**

To ask the Secretary of State for Business, Energy and Industrial Strategy, with reference to the Answer of 3 November 2021 to Question 64728; which meetings his Department has held over the last decade to discuss the burning of wood pellets with (a) Drax lobbyists and (b) scientists.

**Answering member: Greg Hands | Party: Conservative Party  
| Department: Department for Business, Energy and Industrial Strategy**

UK Government officials meet frequently with businesses and stakeholders involved in renewable electricity generation. As a major renewable electricity generator in the UK, officials meet regularly with Drax Group. A list of ministerial meetings is available online and can be found here, <https://www.gov.uk/government/collections/beis-ministerial-gifts-hospitality-travel-and-meetings>.

20 May 2022 | Written questions | Answered | House of Commons | 914

## 5

## Press

Telegraph, 29 October 2022

[Green rules relaxed on fuel for homes amid supply shortages related to Russia sanctions](#)

Guardian 5 September 2022

[Burning forests for energy isn't 'renewable' – now the EU must admit it](#)

[Greta Thunberg](#) and others

Telegraph, 21 August 2022

[Wood-burning power station handed £11bn despite climate warnings](#)

FT, 11 Aug 2022

[UK minister questions sustainability of Drax biomass fuel](#)

Telegraph, 17 June 2022

[Exclusive: Dirty cost of keeping the Government's net zero strategy alive revealed](#)

– Biomass UK,

[Biomass UK statement on Telegraph article on UK's Net Zero Strategy - 17 June 2022](#)

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