

# ***Renewables Obligation: Sustainability Criteria for Solid and Gaseous Biomass for Generators (>50kW)***

*Comments by*

**Northern Ireland Environment Link**

**5 November 2011**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

If you would like to discuss these comments further we would be delighted to do so.

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Thank you for the opportunity to comment on the draft guidance and for the opportunity to attend the presentation held in Northern Ireland on 2 November 2011. The following comments are submitted on behalf of the members of Northern Ireland Environment Link and generally relate to considerations which need to be taken into account when designing a scheme which is relevant to the conditions in Northern Ireland while being designed for the UK as a whole.

We are very much in favour of the development and requirement for sustainability criteria for biomass and biogas fuels. There are significant dangers in promoting any fuel or technology which can have widely differing impacts. In general promotion of biomass use as a renewable fuel is environmentally beneficial, but the tests proposed with regard to land use change and GHG reductions are necessary in order to ensure that practices which are negative in terms of overall environmental impacts and GHG emissions do not take place. Accordingly, life cycle costings in both economic and carbon terms are essential aspects of any promotion of materials or technologies.

Northern Ireland differs from Great Britain in several factors relevant to this consultation and these factors must be considered at this stage in the development of the guidance to ensure that there are no unintended, negative or perverse outcomes from the guidance. We would strongly suggest that it is necessary to consider these factors fully as you develop UK wide policies.

1. Land use in Northern Ireland is different. The Northern Ireland chapter of the UK National Ecosystem Assessment demonstrates the unique aspects of Northern Ireland habitats. The relevant points for this consultation are:
  - a. Northern Ireland has a very low level of woodland – under 10% - and an extremely low level of native and ancient woodland. Increasing the proportion of woodland cover is highly desirable and there are NI targets to do this, and these targets include planting of short rotation coppice (SRC, usually willow). Stimulating tree planting for many purposes is advantageous, and having a market for the material (coppice, brash, thinning) is a positive aspect of encouraging biomass use.
  - b. Most of Northern Ireland is grassland, but the intensity of use and composition vary greatly. It is therefore vital that overall carbon implications are considered for different types of land use change even within a generic ‘grassland to woodland’ criterion. Some grassland is perennial on peatland, with a highly diverse and valuable flora (semi-natural grassland) which has a very high biodiversity, carbon storage and ecosystem service (water storage, cultural, tourism) value; this should not be planted up. Other grassland is frequently ploughed up, used for production of meat and dairy products and offers great opportunities to improve overall carbon and biodiversity outputs if planted in woodland. Mixing these two types of grassland (they are of course a continuum shading into full peatland) would result in very inappropriate carbon calculations.
2. Renewable energy is particularly vital for Northern Ireland. There is relatively a greater emphasis on smaller to medium renewable facilities, with comparatively few large companies involved.
  - a. Northern Ireland is at the end of the ‘supply chain’ and we currently import all fossil fuels and rely on imports for 98% of our energy, with negative consequences for our security and cost of energy.
  - b. Micro-generation at house, farm, business and community scale is particularly important to encourage; complexity of forms and extensive administrative requirements discourage potential microgenerators.

- c. Anaerobic digestion has great potential for a variety of waste and mixed products as well as 'virgin' materials. The technology is still evolving and it is important to ensure that the maximum flexibility is allowed to develop appropriate generation facilities at a variety of sizes and feedstocks.
  - d. There is a perception that having sustainability criteria and reporting mechanisms will be onerous and this could discourage people developing renewable energy operations. It is vital that renewable energy is seen by the public, politicians and business as an attractive option; perceived or actual barriers must be minimised to ensure maximum take-up.
3. Northern Ireland shares a land border with the Republic of Ireland so it is very important to ensure that UK and EU criteria are comparable in order to avoid unacceptable economic incentives for behaviour across that border.
4. Clarity and simplicity are absolutely vital in the guidance, especially around levels of size of plants requiring differing levels of reporting. Micro scale generation requires a 'light touch' to encourage involvement and uptake.