

WWF-UK Response to the Government Consultation on the Reform of the Renewables Obligation (Part 1)

INTRODUCTION

WWF regards climate change as one of the most serious threats facing the planet and human development, and one which demands urgent global action. To prevent average global temperatures from increasing by more than 2°C above pre-industrial levels – a threshold above which the risk of severe and irreversible tipping points in the climate becomes increasingly likely – the world's emissions of greenhouse gases will need to peak and start to fall within the next 10 years. This requires all developed countries, and particularly those with claims to global leadership on the issue like the UK, to take urgent action to reduce emissions and develop renewable and low-carbon energy sources.

WWF is convinced that the 2003 Energy White Paper's focus on energy efficiency and renewable energy was the right approach to effectively addressing both climate change and concerns over security of supply. The 2003 Energy White Paper also rightly set a target for renewables to supply 20% of the UK's electricity by 2020, and this was again broadly committed to in the 2006 Energy Review. However, we are concerned that the current energy review and subsequent consultations have so far failed to place sufficient emphasis on the need to curb energy demand and greatly increase the role of renewable energy sources in the UK.

At present, the renewables obligation (RO) has a built-in shortfall against targets, and we are badly off track for the 10% renewables target for 2010. **WWF calls on the Government to bring forward effective policies which will ensure delivery of the 20% target for 2020, at least, and to introduce a further target to increase renewable output to 25% by 2025.** Such a level of commitment would help to meet climate change and energy security objectives, as well as creating jobs and new export opportunities for UK business.

In this response, we deal mainly with issues of how to best reform UK renewables policy and to a smaller extent we respond to the secondary questions on co-firing. **However, throughout our responses to part 1 and part 2 of this DTI consultation on the Renewables Obligation, WWF is clear that the current policy framework in the UK is failing to build renewable capacity at sufficient scale or speed, and it is this which must be resolved urgently.**

We note with interest the recent Carbon Trust report (Policy Frameworks for Renewables, July 2006)¹ which found that the current policy framework would only deliver 10.1% of electricity

¹ Carbon Trust report, July 2006. (Policy frameworks for renewables: Analysis on policy frameworks to drive future investment in near and long-term renewable power in the UK)
<http://www.carbontrust.co.uk/Publications/publicationdetail.htm?productid=CTC611>

from renewables by 2020. Indeed, the report found that the most cost-effective framework for bringing forward rapid, large-scale investment in renewables was found to be a “Renewable Development Premium”, or a stepped feed-in tariff of the type which has proven extremely effective in Germany and elsewhere at bringing forward a rapid pace of renewables development. Other organisations have reached similar conclusions, for example the Anglo-German Foundation.² **WWF is therefore concerned that the starting point for this consultation on the RO is the banded structure proposal which, according to the Carbon Trust’s analysis, is less effective in terms of both cost and performance.**

WWF believes that decisions on the future shape of renewables policy should respect the following key principles:

- Ambitious rates for the installation of both established and emerging renewable technologies to meet our climate change and energy security obligations.
- The need to retain support for onshore wind which, despite now being relatively well-established, has not yet reached anything like its full potential. Any transition must be managed in a way which will enhance investor confidence, and any risk to future investment should be avoided.
- The need to revive progress in offshore wind development, which has stalled under the current framework. Indeed, the Government is in danger of squandering an opportunity to put the UK at the forefront of this emerging global industry.
- Other marine technologies need to be brought forward urgently in order to help them reach large-scale development and commercialisation. For example, the need to increase the level of and length of time which the Government/DTI provides capital grants for offshore renewables (such as for wave power technologies) so that these technologies move successfully from demonstration to grid connected electricity.
- The need for the Government to review Ofgem’s remit so that offshore renewables are first in the long queue of other technologies waiting to connect to the grid, as well as allowing the burgeoning offshore renewables industry first opportunity to connect to the grid at places on the UK coasts where and when nuclear plants close. There is a close geographical match between the coastal areas of the UK where existing nuclear stations are located and where some of the largest renewable resources of wave and wind power exist.

We believe the RO has shown to be a relatively effective method of encouraging investment in a few relatively well-developed renewable energy technologies, as together with capital grants, it has created an attractive market for investors and has resulted in new renewables capacity.

The Government has often argued that the RO should not “pick winners”. However, in effect this is exactly what has happened and will continue to happen as long as ‘least cost’ is determined by short-term focus on fuel costs and capital investments. Hence, onshore wind, co-firing coal with biomass, landfill gas and refurbishment of existing hydro-electric stations have emerged as the most popular options for generators seeking to maximise their returns – while

²Anglo-German Foundation, November 2006. (Article in ENDS Europe Daily - UK renewables support scheme is flawed).

the RO has not succeeded in encouraging deployment of offshore renewables, sustainable biomass or solar energy projects, where huge potential energy resources still remain largely untapped. This is an important missed opportunity on which the UK Government must reclaim ground.

WWF therefore agrees that the RO, as currently constructed, will fail to deliver the necessary levels of renewables to meet the UK's renewables and carbon emission reduction targets. **Banding of the RO could offer one solution. However, WWF believes the Government has failed to make the case for a banded obligation as opposed to a feed-in tariff approach, identified by the Carbon Trust a more cost-effective approach to rapid deployment of renewables. We urge the Government urgently to commission and publish research in to the relative merits of the two approaches.**

Whichever approach is adopted the devil will lie in the detail. Either a banded obligation or a feed-in tariff will only be successful if the level of support to each specific technology band is pitched at the right level. Moreover, transitional arrangements to adapt the RO to either approach will need to be handled carefully so as not to damage investor confidence. This should entail guaranteed ongoing support for existing projects, and careful consideration of how to treat projects which are at various stages in planning and project design.

WWF is concerned that co-firing of coal with biomass – initially introduced as a transitional measure to support the growth of indigenous energy crops – appears to have become an accepted part of renewables policy in its own right. Co-firing is now being used to help support old, inefficient coal power stations and already helps operators' compliance with their caps under the EU emissions trading scheme – its continued inclusion in the obligation will undermine progress with other true renewables and damage investor confidence. Our concerns are fuelled by the lack of accreditation for life-cycle greenhouse gas benefits and other sustainability criteria. **WWF believes that the government should phase out co-firing in coal-fired stations from the RO entirely, with support being provided through the carbon price and, potentially, other mechanisms outside the RO.**

Renewables can be built quickly and cleanly and offer considerably lower full life-cycle costs than nuclear power stations. We note that the coal, oil, gas and nuclear industries have benefited from massive Government support over the last 50 years, and believe that the Government should accept the case to ensure that the main types of 'true' renewable energy technologies, such as wave, wind and solar, deserve the same if not more support to put them on an equal footing.

Hence, WWF would very much like to see much more ambitious and firm targets for renewables in the UK beyond 2015. In our view a little over-subsidy to ensure the development and deployment of emerging green technologies is acceptable, as opposed to the reverse – under-subsidising these technologies and forfeiting the substantial carbon and sustainable development benefits which they offer.

ISSUES WITH 'BANDING' THE RENEWABLES OBLIGATION

Q1) Is banding the Renewables Obligation the best available option for adjusting the RO to provide more targeted support for a range of renewable technologies?

WWF is concerned that banding of the RO may not be the best available option for improving the support mechanism/s provided by Government to the UK renewables industry. WWF calls on the Government to bring forward the most effective and most optimal effective policy package to ensure delivery of the 20% target, at least, and to introduce a further target to increase renewable output to 25% by 2025.

We note with interest the recent Carbon Trust report (Policy Frameworks for Renewables, July 2006) which found that the current framework would only deliver 10.1% of electricity from renewables by 2020. Indeed, the report found that the most cost-effective framework for bringing forward rapid large-scale investment in renewables was found to be a “Renewable Development Premium”, or a stepped feed-in tariff of the type which has proven extremely effective in Germany and elsewhere at bringing forward a rapid pace of renewables development. WWF is therefore concerned that the starting point for the review of the RO is a banded obligation mechanism which, according to the Carbon Trust’s analysis, is less effective.

WWF believes the Government is pre-judging and limiting this review of the RO by focussing on banding and not giving equal consideration to other options for reform of UK renewables policy, such as feed-in tariffs.

The Carbon Trust report found that “not only are targets being missed, but the cost of installed renewable energy is higher than necessary.” And the Carbon Trust stated it “believes that the Renewables Obligation (RO) should be reformed or replaced.”

The Trust's report also stated that “the full potential of renewables will only be achieved through a policy framework that supports several different renewable technologies at the same time. The RO in its current form cannot achieve this. The Carbon Trust believes that a switch to a *Renewable Development Premium* would deliver the most renewable electricity at the lowest cost. This would offer a fixed tariff on top of the wholesale electricity price to each technology depending on their level of commercialisation, which would be reduced over time as the technology matures and costs decline.”

The Carbon Trust offered clear statement in support of Renewable Tariffs or Feed Laws like those used on the continent: “The most efficient option in terms of cost per unit of energy and achieving maximum offshore wind capacity by 2015 involves moving away from the current RO towards a fixed mechanism, such as a Renewable Development Premium. Feed-in tariffs have been proven to be successful elsewhere (for example, Spain and Germany) in generating significant deployment of lower cost renewable energy. A fixed mechanism addresses both the time delay of the RO and the leakage associated with transferring the regulatory risk to the private sector. It is the most efficient policy mechanism in terms of funding requirement per unit of renewable energy.”

WWF therefore agrees that the RO, as currently constructed, will fail to deliver the necessary levels of renewables to meet the UK's renewables and carbon emission reduction targets. Banding of the RO could offer one solution. However, WWF believes the Government has failed to make the case for a banded obligation as opposed to a feed-in tariff approach, identified by the Carbon Trust a more cost-effective approach to rapid deployment of renewables. We urge the Government urgently to commission and publish research in to the relative merits of the two approaches.

Whichever approach is adopted the devil will lie in the detail. Either a banded obligation or a feed-in tariff will only be successful if the level of support to each specific technology band is pitched at the right level. Moreover, transitional arrangement to adapt the RO to either approach will need to be handled carefully so as not to damage investor confidence. This should entail guaranteed ongoing support for existing projects, and careful consideration of how to treat projects which are at various stages in planning and project design.

Furthermore, WWF is also very concerned by the statement on page 11 of the consultation paper that "the funds available from Government to support emerging technologies would be unpredictable, leading to considerable uncertainty for companies and investors about the level and duration of support available for both given technologies or projects". WWF believes this suggests a lack of commitment from Government to developing sustainable solutions to reducing carbon emissions and ensuring energy security.

It is also important to recognise that measures to reduce absolute UK electricity demand will make the percentage targets for renewables considerably easier to deliver. The UK has a vast potential renewable energy resource, particularly in wind and wave power. However, these resources are still largely untapped. Hence, the Government needs to give clearer, long-term signals, support and good economic incentives to drive forward the development of large scale grid-connected and smaller scale renewable energy technologies.

Q2) Before making a decision on whether and how to band we are seeking views on the impact banding the RO would have on investment decisions.

We believe the RO has shown to be a relatively effective method of encouraging investment to date in a few renewable energy technologies, as together with capital grants, the value of ROCs has created quite an attractive market for investors that has resulted in new capacity (mostly onshore wind) moved from planning to construction and grid connection.

There is a risk that the proposed banding of the RO may knock investor confidence in certain renewables projects if the band levels are not set favourably. Also, banding of the RO will add a further layer of complication to the obligation and so undermine investors' long-term certainty. It will be important to ensure robust arrangements to protect revenue

for existing renewables projects, and transitional arrangements for projects in planning must be sensitively designed.

To maintain and bolster investor confidence, the Government should commit to higher and prolonged levels of capital grant funding for emerging renewable technologies, as well as setting more ambitious and robust renewables targets for 2020 and beyond.

Q3 - 7) N/A in light of the WWF's response to questions 1 and 2 above.

Q8) Do you agree with the proposals to set bands by technology?

Yes, but only as a second best option for improvement. Recent findings from the Carbon Trust show that a feed-in type of renewables support policy may be much more effective than the RO (current or banded) in terms of cost and speed and scale of renewable capacity delivery. Please see responses to questions 1 and 2 above.

Q9 - 11) N/A in light of the WWF's response to questions 1 and 2 above.

Q12) What should be the approach for emerging technologies? Do you support the idea of limiting higher levels of support for emerging technologies to a given level of installed capacity with reductions as capacity increases?

No, WWF does not believe this is a responsible way to progress the growth of the renewables industry. Artificial cut-offs expressed in terms of capacity may fail to ensure that promising technologies, such offshore wind, wave and solar, reach sufficient maturity to realise the potential cost reductions..

Q13) Would you support a process which sought to give an early indication of likely bands – perhaps prior to the passage of legislation through Parliament?

N/A in light of the WWF's responses to the questions above.

Q14) Should there be a statutory limit on how often the bands can change? Should this be expressed in terms of time or installed capacity? What should this limit be?

Please see the responses to questions 1 and 8 above for our views on RO banding and what decisions need to be made and work done by Government to prove its case.

Q15-20) NA in light of the WWF's responses to the questions above.

Q21 Is there anything else we can do to prevent delays?

Yes, and WWF believes that the development of marine renewables, in particular, has been unfairly hindered by the current planning mechanism and lack of integrated management between government departments. WWF considers that the implementation of the proposed marine and coastal renewable energy developments will be better facilitated through the new marine bill and should take place within an effective Marine Spatial Planning (MSP) framework, underpinned by Strategic Environmental Assessments (SEAs) and risk assessment, along with all marine industries.

Progress on offshore wind, which is critical to delivery of the Government's renewables targets for 2010 and 2020, has experienced various obstacles. The BWEA³ warns that under current policies only 2,000MW of offshore wind capacity will be installed by 2015 – compared to a realistic potential of 8,000MW with additional support from Government. WWF calls on the Government to act urgently to ensure that the offshore wind industry continues to develop at the pace necessary to meet renewable energy targets.

Also, WWF believes that offshore wind turbines, for example, should not be subject to an exclusion zone around the UK coast on the basis of visual impact, as no other industry is restricted on such a wholesale and arbitrary manner. The near-shore zone is the most commercially viable area and so imposing an exclusion zone around the UK coast to 12 nautical miles would severely restrict this industry.

There is enormous potential for renewable energy in the UK marine environment and the development of wave and offshore wind technologies should be encouraged and accelerated, provided new projects are developed in a sustainable manner, have minimal adverse impact on marine wildlife and do not affect the integrity of internationally and nationally important marine and coastal nature conservation features, especially in MPAs.

OBLIGATION LEVELS BEYOND 2015/16

Q22) Would the method of estimating generation and raising Obligation levels work in practice? Are there any alternatives? Should the requirement to raise Obligation levels be made a statutory one?

To reiterate the views WWF gave in its response to the DTI Energy Review in April 2006, WWF calls on the Government to bring forward effective policies which will ensure delivery of the 20% target, at least, and to introduce a further target to increase renewable output to 25% by 2025. WWF believes that rather than trying to tinker with

³ Report by the BWEA, Offshore Wind: At a Crossroads, April 2006.

the Renewables Obligation the Government should seriously consider the alternative feed-in tariff approach identified by the Carbon Trust.

However, if the Government decides to stick with the RO then WWF believes greater and prolonged levels of capital grant funding for the wave, solar and offshore wind emerging technologies will still be needed to achieve high levels of renewables in the complicated way. We are concerned that the banding proposal is likely to further complicate an already complicated RO policy and the Government must convince stakeholders and prove its case for banding the RO, as better policy alternatives have been recommended by other institutions.

Q23 - 30) N/A

ISSUES WITH CO-FIRING COAL WITH BIOMASS

Q31) Do you agree that co-firing should be considered a long-term part of our renewable energy and carbon abatement strategies?

WWF does not agree that co-firing should be considered a long-term activity/option eligible for support under the RO. The main objective of the UK renewables support policy (whether an improved RO or the more optimal policy of a feed-in tariff system) must be to ensure the rapid and cost-effective delivery of new, credible renewables in order to help reduce the UK's carbon emissions with minimal environmental impact.

Renewables policy should not be used to promote the use of a potentially non-sustainable resource to prop up ageing coal-fired power stations. WWF supports the development of the sustainable use of biomass, but the fuel must be sustainably grown and sourced and it should be used in efficient, dedicated facilities for both heat and power generation in order to maximise the emission reductions.

WWF strongly believes that the cap on co-firing should remain in place, or be tightened. Better still, co-firing of coal with biomass should be removed as an eligible option under the RO. This would ensure that the RO will focus support on environmentally preferable renewables such as wave, wind and solar.

A 2003 report by Campbell Carr prepared for by the BWEA and Friends of the Earth (An Analysis of the Effect of Co-Firing with Fossil Fuels on the Renewables Obligation) showed that the large size of coal-fired power stations can have a very significant effect on the ROCs market and on the pattern of investment in other renewable technologies under the RO. This analysis also showed that support for co-firing could damage investor confidence, and that co-firing could even increase carbon emissions through displacement of more efficient and less polluting electricity generation.

Thus, WWF believes in that the Government should aim to phase co-firing of coal with biomass out of the RO entirely. Support for co-firing at coal-fired power stations should only be provided through the carbon price under the ETS.

Q32) Do you agree with this approach of uncapping co-firing and reducing its support through banding?

No. Please see response to question 31.

Q33) Are there likely to be any significant negative consequences?

Yes. Please see response to question 31.

Q34) Views are invited on the reports on the sustainability and economics of co-firing that are being published alongside this consultation document.

The research commissioned, and other studies, indicate that co-firing gives substantial greenhouse gas (GHG) savings, whether the fuel is sourced in the UK or imported, and whether it is woody biomass or energy crops. However, the literature generally confirms that woody biomass gives a much greater GHG saving than energy crops.

If Government does decide to keep co-firing in a banded RO, WWF believes the policy framework must be reformed to support the best options in terms of GHG emissions reductions and wider sustainability, rather than simply treating all biomass as equally good. The life-cycle (former land-use, production, processing and transport) GHG balances for different feedstocks needs to be measured, as well as wider sustainability. Alternatively, high standards for both GHG emissions reductions and sustainability (RSPO, RTRS, FSC, etc) that biomass must meet to qualify and be given ROCs and a sliding scale based on GHG savings could be used. A mechanism is needed that pushes improvement in performance over time could then be adopted.

Q35) Views are invited on options for addressing any remaining barriers in the Obligation to the burning of wastes.

WWF does not agree that the use and burning of wastes, other than woody biomass and energy crop types of biomass, should obtain support under the RO. This is because WWF believes that renewables, and hence the RO, by correct definition should be those technologies which generate electricity from infinite energy resources such as wind, wave and solar, (and the use of biomass only when it leads to a net reduction in carbon emissions and is sustainably sourced).

Again, WWF believes if the Government decides waste minimisation and the burning of wastes, like agricultural slurry, is in need of support, then the Government should develop and introduce a separate and specific targeted support mechanism for such activities, and not try to “shoe-horn” such practices into the RO where they could undermine progress with more sustainable, truly renewable energy sources.

Q36) Do you agree with the approach of putting the co-firing of energy crops in a higher band than other forms of co-firing? Is there an alternative way to continue to support energy crops?

Again, WWF believes that the RO as a support mechanism must be based on the best life-cycle GHG emissions reductions and on lowest environmental impact – not on a desire to develop a new industry which is not truly zero carbon, such as energy crops. The primary aim of the RO must be to tackle climate change responsibly and not as a tool for rural economic development.

Hence, WWF believes that if the Government decides energy crops are in need of support, then it should develop and introduce a separate and specifically targeted support mechanism. It should not try to “shoe-horn” non-zero carbon technologies into the RO, as this would undermine the level of support the RO can provide the “true” renewables where larger carbon savings and energy resource exist, such as wave and offshore wind.

Please also see WWF’s response to question 31.

Q37) Views are invited on how to ensure the sustainability of co-firing over the long term.

WWF is not clear whether this question refers to the long-term economic sustainability of co-firing, or the environmental sustainability. We reiterate our view that co-firing in coal-fired power stations should be driven by the carbon price under an effective EU ETS, rather than distorting true renewables policy under the RO. As for the environmental sustainability of biomass, please see our answers to later questions.

Q38) Would you support the development of an accreditation-based approach to sustainability issues for biomass use?

WWF certainly does support the development of a high quality accreditation-based approach to sustainability issues for biomass use in relation to the RO or other policies. There are rapidly emerging sustainability standards for palm oil, soya and sugarcane, and there are existing standards for pulp and timber. There are also basic standards for a range of UK agricultural crops – although these tend to be focussed on food safety rather than environmental sustainability so may need tightening.

The RSPO, FSC, RTRS, BSI are or will be widely accepted by all stakeholders and are transparently and independently audited. WWF urges the Government to ensure that these existing approaches are combined with assessment of life-cycle GHG balances for biomass. Crucially for both credibility and environmental effectiveness, meeting these standards must be a pre-requisite for any biomass project to receive ROCs.

Without high quality standards there are multiple risks from the rapid expansion in the use of commodities like palm oil for bio-energy. High Conservation Value Forest loss and its impacts on biodiversity in South East Asia, as well as the threat of contributing to global climate change by clearing rainforest to grow bio-energy make it also essential that standards are rigorously enforced.

WWF has asked and continues to ask for mandatory eco-certification for biofuels in the EU. We believe it is imperative that the EU establishes a legally binding certification system for both imported and domestic biofuels. The certification system must be based on enhancing the potential of biofuels to cut greenhouse gas emissions, while avoiding the wider environmental impacts of biofuel production. This will help to protect the environment in developing countries and contribute to carbon emissions reductions in the EU in a sustainable way.

As the EU is unlikely to be able to meet all its biofuels needs from domestic sources, any scheme designed to ensure biofuels are produced sustainably must cover imported fuels as well. Already millions of hectares of tropical forest have been cleared to make way for plantations of palm oil, soy and sugar - all major sources for biofuels - leading to huge biodiversity losses. As well as polluting soils and waters, the use of pesticides on the crops also threatens biodiversity.

The certification system must also cover the climate benefits of any potential biofuel, as energy-intensive production methods mean many biofuels offer little advantage over conventional fuels in terms of overall greenhouse gas emissions.

The current practice of automatically classifying all biofuels as “renewable” regardless of how they are produced is counter-productive. If the EU is to meet its Kyoto and renewables targets, WWF believes it must promote those biofuels which offer the greatest greenhouse gas savings, such as sustainably produced forest and wood products.

Certification schemes would necessarily have to be easy to apply and flexible enough to take account of local conditions. WWF has already been instrumental in setting up the Roundtable on Sustainable Palm Oil, which has brought together producers, buyers, retailers, financial institutions and NGOs to develop practical criteria for the responsible production of palm oil.

WWF has particular concerns regarding:

- Where bio-energy feedstocks are produced: ensuring the integrity of high conservation value forests, floodplains, natural and semi-natural grasslands as habitats and the needs of the biodiversity they harbour;

- How bio-energy feedstocks are produced: using agricultural and forestry management techniques that can guarantee the integrity and/or improvement of soil and water resources;
- The GHG emissions and carbon losses in how bio-energy are produced, processed and distributed: ensuring that the technologies and management systems applied comply with good practice and can demonstrate they deliver GHG savings over conventional fuels.
- Food, land and water displacements: All of the currently used bio-fuel commodities are also food and feed crops. The interest in bio-fuels has already led to price increases for many of these crops, which can challenge the capacity of the communities that depend on them to continue sourcing them for their own needs.

A good certification system for commodities being produced at scale will also have several other advantages for its users. For example;

- a robust stakeholder process,
- a focus on key environmental and social effects,
- performance based metrics to facilitate verification, and
- a verification process that conforms to relevant international standards

Certification of bio-energy must also address critical social and economic criteria. These include the key social and economic issues associated with each crop. As with key environmental issues, these will vary somewhat from crop to crop, and from region to region.

Various initiatives on environmental and social assurance have been developed. For instance, the UK and the Netherlands are setting up a certification scheme for local production and imports of bio-fuels. These initiatives should be encouraged, although in the future it would be desirable to see such initiatives taking place on a multinational basis. Especially when it comes to GHG certification, WWF sees a key role for the UNFCCC. A reduction of GHG emissions has been politically mandated through the Kyoto Protocol. Under the current system, GHG emissions leakage cannot be avoided when international bio-energy trade occurs, as no GHG accounting system exists for bio-energy.

The Protocol provides a multinational legal spur to solve this problem, by transposing GHG calculation for bio-energy into implementing legislation. It is important to note that discriminating bio-fuels based on GHG emissions savings can lead to no automatic exclusion of particular feedstocks, countries of production or methods of production, issues of particular importance under international trade rules.

Q39) Would you support a requirement on generators claiming biomass or co-fired ROCs to publish information on the sources of biomass used in their power stations and any relevant sustainability information?

Yes. WWF believes that detailed reporting on sustainability and life-cycle GHG emissions savings should be mandatory. Generators claiming for biomass or co-fired ROCs should be required to publish information on the sources of biomass used in their power stations and any other relevant sustainability information. Failure to report or inadequate reporting should mean that ROCs will not be given.

WWF also believes the use of existing and emerging certification schemes (such as the RSPO, RTRS, FSC, etc.) would mean that additional reporting on sustainability would not be needed. However, detailed and independently verified reporting on GHG emissions savings would need to be developed independently. Furthermore, reporting must not be presented by Government as a burden on the industry, but as an essential prerequisite for entry into the RO.

Q40) Are there any alternative approaches for ensuring sustainability in the biomass sector?

From past experience with other industries' repeated failure to achieve voluntary targets and standards, WWF believes that mandatory targets and high quality standards for the biomass/bio-fuels sector are urgently needed. Thus, no alternative to this particular issue is warranted.

For enquiries relating to this consultation response, please contact Andrea Kaszewski (Energy Policy Officer, WWF-UK) on AKaszewski@wwf.org.uk.