

27 October 2009

Sandra McMillan
Sustainable Energy
Department of Enterprise, Trade and Investment
Netherleigh
Massey Avenue
Belfast
BT4 2JP

Dear Sandra,

UFU Response to the Bioenergy Action Plan

The Ulster Farmers' Union (UFU) welcomes the opportunity to respond to the Bioenergy Action Plan 2009. With 12,500 farming members, the industry we represent has a significant role to play, both as a producer and as a consumer of energy.

From a producer point of view. There is an opportunity for our membership to diversify production and to branch out into new energy supply businesses, with biomass supply and bio-energy the key areas where agriculture will play an integral role. On the other side of the coin, as consumers, global attitudes to energy consumption is changing, mainly due to our reliance upon fossil fuels, particularly here in Northern Ireland.

The UFU welcomes the government's publication and development of this draft 5-year Cross Departmental Action Plan for the coordinated development of bioenergy in Northern Ireland. However, there is an element of disappointment there would appear to be nothing new contained in the Action Plan – this may, however, be due to the fact that this report is seen as a 'Roadmap' rather than a definitive policy document.

The UFU wishes to comment on the two main objectives contained in the draft Action Plan;

Objective 2 – create a supportive and encouraging policy and regulatory framework within which the bioenergy sector can develop and thrive.

Establishment of a Renewable Heat Market - UFU welcomes the establishment of a Renewable Heat market, however, as stressed previously, it is still very early days in this area and there will be much work to be done in the coming months and years.

Access to the Electricity Grid – When used for the generation of electricity, bioenergy is acknowledged as a reliable and predictable resource for grid management purposes. The UFU welcomes the acknowledgement given to the role of distributed or decentralized generation.

Distributed generation reduces the amount of energy lost in transmitting electricity because the electricity is generated very near where it is used, thereby improving overall grid efficiency.

Whilst the UFU welcome the detail of a Grid strengthening programme, we are seeking assurances that any mention of distributed generation should be reflected in such a programme. Renewables should be allowed proper access to the grid, and, in particular, alternative distributed generation needs to be considered if this is to be a success.

Neither the summary of actions on page 23 nor Annex C (a summary of Frameworks and actions) specifically mention any study or work which is to be carried out on electricity grid access. The UFU wish to seek assurances that the programme mentioned above is carried as the of any future Sustainable Energy Policy will be dependant upon grid studies being carried out.

Objective 3 – Encourage and support targeted investment in key areas of the overall bioenergy supply chain to stimulate growth

It is important however, that the supply of and demand for any biomass crop is carefully managed to not only ensure adequate supply levels but also that, particularly from a grower perspective, an oversupply situation does not materialize. The UFU would also highlight that consideration and also focus needs to be given to all crops, in particular crops which are common crops here in Northern Ireland, such as commercial grain crops, rather than concentrate on a specific crop. This document gives little mention to these other crops and their potential.

Under the heading of farm and food processing residues, the plan mentions the role of **Anaerobic Digestion (AD)**. The UFU welcomes mention given to the AEA study where the target of 50 AD plants should be in place in Northern Ireland by 2020. As with any growing technology, we would wish to stress that any target should not limit further new entrants wanting to start up new AD plants.

The UFU welcomes the incoming Biomass Challenge Fund and look forward to future involvement.

In terms of the role of agriculture, the UFU attended the recent Invest NI-organized NI Energy and Environment Conference at the Waterfront Hall. We were, however, extremely disappointed by the scant mention of the role of the agriculture in the bio-energy sector. In light of this, we should draw attention to the Agricultural Stakeholder Forum on Renewable Energy (ASFRE) Report currently in the hands of the Agriculture Minister, Michelle Gildernew. The UFU played a key role in the development of this Report and we would stress that its findings and workings should be incorporated into any agreed Bioenergy Action Plan.

Yours sincerely,

CHRIS OSBORNE
Policy Officer