

SCOTTISH OPENCAST ACTION GROUP

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COMMENTS ON THE TOPICS RAISED BY THE PIU ENERGY REVIEW SCOPING NOTE

Introduction

Scottish Opencast Action Group (SOAG) is a totally voluntary network of people brought together by the increasing levels of opencast coal mining across the central belt of Scotland. Since 1994, SOAG has campaigned against the inappropriate expansion of opencast coal mining on behalf of threatened communities and their environment: SOAG members are not against opencast coal mining as such, but believe the current guidelines (NPPG16 in Scotland) to be too weak and open to interpretation to protect the environment. We appreciate this opportunity to input to a small section of the Energy Review - namely, opencast coal mining.

Point 1

Opencast coal mining is known to cause considerable environmental damage and community disruption. Furthermore, coal is the 'dirtiest' of the fossil fuels due to its high carbon content, and various levels of sulphur and other detrimental emissions released by its combustion.

Therefore, SOAG hopes that the energy review would address this problem by restricting the importance of opencast coal as part of "secure, diverse and reliable energy supplies" available to the UK. Doing so would also be compatible with climate change commitments.

Point 2

While employment and training issues may be outwith the remit of this scoping note, it is imperative that the Government addresses the economy of former coal mining areas and introduces alternative sources of employment and training.

SOAG supports the development of renewable energy sources, where appropriate, as such an alternative.

Point 3

SOAG is concerned that the project seems only to consider CO₂ emissions when looking at environmental

objectives (paras. 5-9¹), and refers to the environmental impacts of energy consumption in para. 19 (pt. i).

SOAG asks that the environmental damage of securing a fuel in the first place is considered, not just the emissions from its conversion to energy. This approach should also encompass marine pollution from off-shore oil production and radioactive wastes from nuclear power stations, for example.

Point 4

Para. 12 implies that "coal generation [is] likely to have only a limited role".

This limited role should be clearly defined in terms of both opencast and deep-mined coal.

Point 5

Para. 19 (pt. ii) refers to "clean coal technology initiatives". That countries such as China and India face increasing energy needs and are likely to rely heavily on fossil fuels such as coal is no reason to develop clean coal technologies in the UK. Such new technologies should be developed where they are to be used, thereby helping other countries to develop new technologies for themselves, albeit with aid and assistance from 'developed' economies.

Clean coal technologies should be limited for development in the UK and companies wishing to pursue such development should be encouraged to conduct development 'in country'.

Point 6

SOAG is concerned that "reform of the operation of the electricity market to remove distortions which encouraged investment in gas-fired power generation at the expense of existing coal fired plant" (para. 19 pt. ii) will mean an increased reliance on coal which, for economic reasons, will undoubtedly mean increased opencast coal use. The "short-term subsidy" for the coal industry should not be repeated. This is a privatised industry and if it cannot profit from well-regulated coal production, including strict environmental protection measures, it is not a viable industry and SOAG believes any subsidies should concentrate on workforce re-education and employment in alternative industries.

A clear commitment to renewables and an end to subsidies for the coal industry should be defined by the Energy Review.

Conclusion

As the project is to look at energy policy until 2050 (para. 20), SOAG believes that emphasis should be on

¹ Please note that para. 9 seems to be missing and there are two paras.10. By para. 9 we refer to the first para. 10

renewables. There are diverse (solar, off-shore and on-shore wind, small-scale hydro, biomass), secure (no one can claim to own our sun, wind or rain) and will create sustainable employment. Their reliability awaits Government commitment and investment to renewable energy development. There are good examples in Europe and elsewhere of how renewable energy can be everything we want it to be. Renewable energy is no longer a 'pipe-dream' of the idealistic and the UK, with its labour skills and natural resources, is ideally placed to become a world leader in this technology for the future.

Yours sincerely

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