

FREEDOM OF INFORMATION REQUEST

8 March 2021

Thank you for your enquiry with clarification, received on 8 February 2021

Your request:

Part One

Please provide copies of correspondence and notes of meetings between CCC and employees/directors of Drax plc.

Part Two

Please provide copies of internal correspondence, meeting notes and presentations on the subject of Bioenergy with Carbon Capture and Storage, for the 2020 calendar year only.

Our response:

Part One

We have handled our response to your request under the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) as the information requested spans both access regimes.

Unfortunately, we are not be able to answer your request without exceeding the appropriate limits set out in section 12 of the FOIA. This is because to locate, retrieve and extract information in scope of your request would involve over 69 hours of staff time. So far, we have identified over 880 separate pieces of communication. We estimate that locating the information has taken approximately 10 hours so far and that to extract and collate each item would take approximately 4 minutes leading to a further 59 hours.

We have also considered your request in relation to environmental information under EIR. Following a review of a sample of the correspondence items we consider it is not possible to identify which correspondence contains environmental information and which correspondence does not without reviewing each item individually. Consequently, we would need to collate and review all the identified correspondence to enable us to isolate the environmental information. On this basis the costs of collating all the information (as described above) should be taken into consideration when deciding whether section 12 4 (b) should be engaged.

Further, the costs of separating the environmental information must be taken into account. We estimate it would take approximately 2 minutes per item of correspondence to separate environmental information resulting in a further 29 hours, giving a total of 81 hours. On this basis we have engaged the exemption at regulation 12(4)(b) of EIR.

One of our Committee Members, Dr Rebecca Heaton, is an employee of Drax Group. Your request therefore covers a wide range of routine internal correspondence to Committee Members and members of the Secretariat. It may be possible to refine your request by requesting copies of correspondence between the CCC and employees / directors of Drax plc where they are acting solely in their capacity as an employee / director of Drax plc.

Part Two

We have handled our response to your request under the Environmental Information Regulations 2004 (EIR).

So far, we have located just over 900 pieces of internal correspondence, meeting notes and presentations. We estimate approximately 6 hours of time has been spent locating the information to date. The estimated time to extract, collate and redact personal information is estimated to be 4 minutes per email resulting in an additional 60 hours of work. On this basis we have engaged the exemption at regulation 12(4)(b) of EIR.

We also engage the exemption at regulation 12(4)(e) internal communications. To consider whether it is possible to engage the exemption at regulation 12(4)(e) we have assessed the public interest in disclosing the information. We considered the need to protect the internal deliberation and decision-making processes within the CCC, versus the need to provide information to inform the public debate. We reviewed the information on BECCS which has been published as part of the 6th Carbon Budget Advice, including an additional report on Deep Decarbonisation Pathways by Element Energy (available here: <https://www.theccc.org.uk/publication/deep-decarbonisation-pathways-for-uk-industry-element-energy/>). The N-ZIP model developed as part of this study will be published online (with a technical Assumptions Log) in 2021. The treatment of BECCS in the Committee's advice on Net Zero and the Sixth Carbon Budget is based on its in-depth 2018 report *Biomass in a Low-Carbon Economy* (available here: <https://www.theccc.org.uk/publication/biomass-in-a-low-carbon-economy/>). In view of the significant amount of information already released and planned to be released we deemed that maintaining the exception to respond outweighs the public interest in disclosing the information.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. If you are not content with the outcome of the review, you may apply directly to the Information Commissioner for a decision.

In keeping with our transparency policy, the information released to you will be published on www.theccc.org.uk. Please note that this publication will not include your personal data.

Kind regards,

Committee on Climate Change