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Dear Mark,

Environment and Code Objectives - consultation

The Renewable Energy Association is grateful for the opportunity to comment briefly on this consultation. As you are aware our members work on all types of renewable power and heat projects and therefore take an interest in not only electricity market matters but also issues such as direct injection of “biomethane” into gas networks.

We are supportive of the line that you are proposing. We agree with you that industry code panels are probably not best-placed to consider environmental impacts of code changes other than those associated with the emission of greenhouse gasses. We also agree that environmental impacts should only be assessed where relevant i.e. if the proposed code change is not expected to have an impact it need not be worked on further.

In terms of the actual wording we have a slight concern. Including “an assessment of the financial impact of greenhouse gas emissions on society” could be taken as requiring panels to perform a basic investigation into how much the emission of one additional ton of a particular greenhouse gas costs society. Whereas the intention is for panels to assess how much more or less of a particular greenhouse gas is likely to be emitted and then cost it using one of the established figures for cost / ton of that gas. Guidance has already been given on this and we would expect it to be revised as appropriate. Providing the wording on this is clarified, we support the proposal.

Please let me know if you would like to discuss this further.

Yours sincerely

Gaynor Hartnell
Director of Policy,
REA.