

British Wind Energy Association response to the Scottish Executive Preliminary Consultation on the Renewables Obligation (Scotland) Review

The British Wind Energy Association welcomes the opportunity to respond to the Scottish Executive's Review of the Renewables Obligation (Scotland). With over 320 members, BWEA is the largest renewable trade association in the UK, and it represents the industry which should provide the majority of the energy counting towards the UK Government's target of 10% renewable electricity by 2010 and the 20% aspiration for 2020, and also the Scottish Executive's aims. BWEA hopes, therefore, that its response is given due consideration by Executive, as its members will be doing the lion's share of the business conducted under the ROS. A full listing of BWEA members can be found on the Association's website, www.bwea.com.

BWEA is affiliated to the Scottish Renewables Forum and works closely with SRF on issues of common interest. The Association generally supports the submission made by SRF in response to the Executive's preliminary consultation; BWEA is also sending the Executive the Association's submission to DTI on the England and Wales RO Review in order to show our general position on the questions laid out by UK Government. There are some areas where BWEA would like to underline points made by SRF and indicate differences in emphasis. These are laid out below.

BWEA strongly supports SRF's line that any changes to the structure of the ROS in order to support emerging renewable technologies should be the policy of last resort. The Association cannot see any way in which the structure of the ROS can be amended without damaging investor confidence, which would put the attainment of targets at significant risk. Support for emerging technologies must therefore be given in addition to the ROS and not in the form of changes to it. Apart from this point, were the Executive to unilaterally change aspects of the ROS, it runs the risk of dis-integrating the market for ROCs, which would add considerably to the complexity and administrative burden of an already complicated system.

This last point also applies to the Executive's proposal to add wood from sustainably managed forests to the definition of energy crops. While the Association has no difficulty in principle with this extension, were it to lead to cross-border ROC trading difficulty, then BWEA would regard it as a retrograde step. Any such move should be carefully considered in partnership with DTI and the market players in order to ensure that any extension can be managed practically and not upset the supply-demand balance of ROCs in the UK market.