Submission ID: S1EA62A53

I comment upon both the responses to the WR and to the lack of response to the post-hearing written submissions.
The EPE responses have been to theme the numerous points raised into very broad categories, then to answer ‘their own interpretation’ of those points with bland statements which refer to obscure sub-clauses in a plethora of other documents. This cannot be considered as anything other than deliberate obfuscation and being perversely unhelpful. The public and the ExA have a right to expect direct and clearly focused responses to points raised.
The full life cycle of the two main component parts of Brockwell’s proposals (panels and batteries) have not been sufficiently explained. Brockwell are unable to demonstrate proven recycling methods and their current carbon calculations are half those of SEPE’s. These figures cannot be ignored; the ExA should require a thorough audit of the calculations by independent professionals. The supply chains need to be examined as well as any recycling process, particularly whilst ‘new’ is usually cheaper than ‘recycle’. All aspects of supply should be considered, including the environment and associated ethics along the supply path.
Once again I wish to challenge the ExA’s apparent decision to scope out forced labour concerns in his rule 6 letter. Even if this is consistent with other scheme examinations, it strikes me as a rather blatant attempt to rule out a contentious issue on grounds that have now been superseded by the enactment of the GB Energy legislation. My post hearing written submission was as follows.
Since the Secretary of State's decision on the Mallard Pass project the Government (and the Secretary of State) have specifically legislated in the GB Energy Act for “measures ensuring that slavery and human trafficking is not taking place in its business or supply chains”. This is now the law, it should apply equally to a small enterprise as to a large one. It is therefore incumbent on the applicants and the inspector to ascertain there is no forced labour within the supply chain. There is no justification for scoping-out such proof or requirement now the new law exists. No such precedent can be assumed from that Mallard Pass enquiry which preceded the introduction of the GB Energy Act. Would the Examining Authority please therefore ensure this matter is not scoped-out?