



Begbroke and Yarnton Green Belt Campaign (BYG)

Deadline 7, BYG: Decommissioning costs of BWSF

The ExA and IP's have respected due process throughout the examination and followed its various deadlines. Not so the Applicant, which has frequently shown an inability or apparent unwillingness to provide information, or more detailed information, when requested. Furthermore, information that *has* been provided is often flawed and inadequate.

1. The clearest example of this is found in the Applicant's submission in respect of decommissioning costs. In REP5-060, BYG pointed out the absurdity of the evidence put forward by the Applicant in answer Q2.1.17, which supported their contention that decommissioning costs could be ignored since the sale of the panels removed would outweigh any decommissioning costs incurred. This extraordinary proposition suggested that, despite their limited remaining useful life, the sale of these obsolete panels would cover the vast costs that would be incurred in decommissioning.

2. Following submissions highlighting the obvious problems with the case made by the Applicant, its approach has now shifted to contending that the value of various metals recovered during recycling will cover decommissioning costs (REP6-049, pages 54/55). Yet again, the evidence provided by the Applicant to support this claim is simply based on a trawl of the internet to discover references that can be used to build a case, rather than on a professional and independent assessment of the facts. A simple review of the evidence provided by the Applicant to support the case again reveals fundamental problems.

3. First, the Applicant's estimates for decommissioning costs are based on a document provided by the Department for Energy Security and Net Zero (Chapter 5.8.1, DESNZ *in* Renewable Energy Generation Cost and Technical, Assumptions – Onshore Wind and Solar PV Cost of Electricity Report, Update 2024, 14 July 2025). The estimates used are included in paragraph 6.8.4 of that document. It is made clear by DESNZ that its data was based on only five responses, so is of extremely limited value.

4. More important, the fundamental mistake made by the Applicant is its failure to notice the explanation, in paragraph 3.8 of the same document, that the costs presented are *net* of the proceeds of sale from the panels. The calculation presented by the Applicant therefore includes a double counting of revenue.

5. The estimate for recycling costs is based on information gleaned from a website in the US (*Solarrecycling.com/How to Save Money Recycling Solar Panels*). Whether or not such US-based cost estimates have any relevance is, of course, highly questionable. The website makes the point that the costs of transporting panels to recycling facilities are extremely high. The Applicant appears to have overlooked this in relation to BWSF.

6. However, the most interesting statement made on this website is that *"Material recovery economics show an interesting balance sheet. Each recycled panel produces materials worth USD 3.00 to USD 12.00. This results in a net cost of USD 8.00 to USD 27.00 per panel"* In other words, recycling currently results in a reduction of *some* cost; it does not generate net revenue as contended by the Applicant.

7. The Applicant's submissions about decommissioning costs demonstrate that not only did it give no proper thought to them prior to making the Application, but it also continues to give them no serious interest or attention. This indicates that the Applicant has had no serious discussions about the funding of this stage of the project, thereby confirming that the ExA is correct to require a decommissioning guarantee in the DCO.
