



MITSUBISHI HEAVY INDUSTRIES ENGINEERING, LTD.

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Mitsubishi Heavy Industries Engineering, Ltd
3-3-1 Minatomirai, Nishi-ku
Yokohama, 220-8401
Japan

Mr. F Di Stefano
Environment Agency
Horizon House
Deanery Road
Bristol
BS1 5AH

19 August 2022

Dear Mr. Di Stefano

DRAX CARBON CAPTURE PERMIT VARIATION: NOTICE TO EXCLUDE CONFIDENTIAL INFORMATION FROM PUBLIC REGISTER

This letter is a request to exclude certain information contained within the application for an environmental permit variation submitted to operate carbon capture at the Drax Power Station (VP3530LS) from the public register on the grounds of commercial and industrial confidentiality.

This request is made by Mitsubishi Heavy Industries Engineering, Ltd (“**MHI**”) as the person who has supplied commercial and industrial confidential (“**CIC**”) information to the applicant, Drax. Please treat this letter as a formal notice in accordance with section 48(1)(b) of The Environmental Permitting (England and Wales) Regulations 2016.

MHI proprietary solvent

This notice relates to the proposed use in the carbon capture process of a proprietary amine solvent developed and supplied by MHI. This solvent has the potential for higher capture rates, lower energy consumption, lower solvent degradation, lower amine emissions to air, and less equipment corrosion, thereby increasing carbon capture plant lifespans, compared to the non-proprietary conventional solvent used in the carbon capture process.

The composition of amines within the solvent is a trade secret of MHI. CIC amine-related information has been supplied to Drax by MHI under terms of strict confidentiality including to enable Drax to meet regulatory requirements.

Public disclosure of this information would cause substantial harm to the legitimate commercial interests of MHI as third parties would be free to develop their own version of the solvent and, without needing to have made the same investment as made by MHI in terms of the time and costs of research and development, would gain an unfair commercial advantage over MHI. We have real concerns that public disclosure of this information could stifle future innovation and associate investment in carbon capture and storage in the UK.

CIC information

The specific CIC information to which this notice relates appears in Appendix F (methodology for derivation of EALs) and is the name of the three amines that appear after the words “*The amines used in the MHI capture plant are:*”.

Clearly, the specific CIC information covered by this notice is very limited and especially so in the context of the emissions modelling and assessment information provided by Drax. Although there is other CIC information contained in the application, we have confined this notice to the absolute minimum information necessary to safeguard the legitimate commercial interests of MHI. This CIC information does not relate directly to emissions from the plant and its exclusion would not prevent public understanding and participation in the permitting process given the extensive amine-related emissions information already provided and which we have not asked to be excluded from the public register.

If you wish to discuss this letter with us, please contact Takashi Kamijo (takashi.kamijo.yt@mhi.com).

Yours sincerely,



Hidenori Kuriki
General Manager
Decarbonization Business Department