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# Time to chase the devil from the IMO


"AN IMPORTANT MILESTONE along the road to 100% decarbonisation," was the impressively non-committal rallying cry emanating from the International Maritime Organization's digital incarnation this week.

A diluted, tepid brew of short-term efficiency measures was served up with the promise of carbon-free jam tomorrow, but it was a compromise that only united the fragmented positions in disappointment.

Such is nature of consensus politics you may argue, and the fact that the meeting happened at all is minor diplomatic miracle given the pandemic-fuelled constraints.

But 'better than nothing', was not the headline takeaway shipping needed given the pressure of public opinion regarding climate change and the general feeling that the IMO's efforts are being overtaken by cargo- and finance-led initiatives along with regional emissions schemes.

This week's debate has rather exposed the intractable nature of the task in hand and raised some worrying signals for the big debates yet to come.

The reality is that regional regulatory fragmentation is now inevitable to some degree.

The European Commission and the European Parliament's ongoing efforts to include shipping in the European Union's carbon market and force emissions cuts on ships calling at European ports will in no way be derailed by lacklustre operational measures that fail to put shipping in line with the Paris Agreement.

Nobody was working under the misapprehension that slapping a carbon efficiency ship rating sticker on the hull of a kamsarmax was going to be enough to make the European Parliament think twice about its planned incursion into IMO's carbon reduction mandate.

But those moderates looking for evidence that a global plan with teeth is achievable down the line will be struggling with the implications of this week's debate.

Those with long enough memories to recall the tense scenes within the IMO seven years ago will well understand that the next step in the regulatory debate will make the current operational efficiency discussions look like a pleasant distraction.

At that point the agency's Marine Environment Protection Committee was divided down geopolitical lines over so-called market-based measures (MBMs) that pitched developed and developing world nations into a fundamental debate over who foots the bill for climate change.

The world has moved on, but the IMO has revealed itself to be similarly stuck, split and unwilling to agree on re-opening the debate.

Let's be clear, agreeing on the MBMs, as the IMO jargonistas have dubbed them, will not be easy or quick. The needs of and implications of developing, small islands, and least developed countries will have to be considered and developed countries will be obliged to help them out in this costly endeavour.

This is politics beyond shipping, but this is exactly why delaying the launch of a very complex negotiation will only make it more painful when it inevitably comes, subject to more external pressure and likely devoid of the necessary time needed to take into account all considerations.

If those arguing that the value of this week's uninspiring compromise is that it allows IMO and its member states to get on with the more critical work of catalysing the full decarbonisation of the shipping sector, then they should do so and stop delaying the inevitable.

We always knew the devil was going to be in the detail. It's time to face him head on.

# Shipping's proposed $5bn research fund endures IMO scrutiny

SHIPPING's proposal for a $5bn decarbonisation research and development fund has been met with scepticism by governments meeting this week at the International Maritime Organization.

In its first talks about the idea, the IMO Marine Environment Protection Committee gave the proposal its political baptism of fire on Thursday, inserting it into the broader struggle over the development of more measures to slash greenhouse gas emissions.

Backed by eight of the biggest industry associations, the proposal seeks to impose a mandatory levy of $2 per tonne of fuel consumed by ships to fund R&D projects by raising an estimated $500m annually and $5bn over 10 years.

The funds would be administered by an autonomous organisation, to be called the International Maritime Research and Development Board (IMRB). The eight groups hope to have the organisation up and running by 2023.

Delegates to the virtual MEPC generally welcomed the creation of the board, at least in principle, with some asking more questions than others. Many identified shortcomings, ambiguities and potential complications as well as promising elements.

Though the concerns were various and oftentimes very specific to a country's perspective, the structure and governance of the proposed board was a recurring theme.

The industry groups have sought to create an apolitical body in the new non-governmental organisation that will administer funds based on the R&D projects' merit. That puts what would be $500m in annual revenues out of the IMO governments' reach.

Countries questioned how an autonomous IMRB would operate from a legal perspective and in practice. Some asked whether there was even a need for the creation of an independent body.

Others also raised issues around intellectual property rights of the technologies that IMRB projects might create, while some emphasised that the goals of the organisation may need to be more clearly defined

Many countries also advocated that a portion of the revenues be set aside to support small island developing states and least developed countries.

The feature that attracted the greatest scrutiny though, was the mandatory nature of the $2 per tonne of fuel levy.

Greece was one of the most supportive governments of the IMRB arguing the fund helps deliver a global set up that will ensure a level playing field in international shipping.

“We favour mandatory contribution per tonne of fuel purchased because it incentivises fuel optimisation of existing fleet, it avoids connotation with double or triple taxation of activities and it is by far more equitable for a cyclical industry as it directly relates with the actual operation of the ship,” the Greek delegation said.

Japan also welcomed the proposal, urging IMO member states to start work on its finalisation.

Malta said the proposal was “commendable,” though called for some clarifications.

Since unveiling the proposal at the end of 2019, sponsors have at various times sought to make clear that this is not intended to be a market-based measure that will penalise fuel oil use but rather an R&D funding exercise, though it could offer some of the architecture for such a measure in the future.

The widespread acknowledgement that a $2 levy is insufficient to stimulate a move away from fossil fuels or create demand for alternatives supports the claim.

Market-based measures remain a highly controversial subject for the IMO and just a day earlier countries at MEPC showed sharp divisions in their willingness to even begin of considering them as a tool to cut emissions.

Thursday’s debate conveyed that while understanding and recognising the intention and theoretical difference, some governments do not see much material difference or believe the two issues are very closely linked.

Finland said the contribution should be raised from the proposed $2 per tonne of fuel given the financial requirements of decarbonisation.

China, on the other hand, said the proposal was not mature enough in its current form. The development of zero emissions fuels is a commercial matter and the IMO’s priority should be ensuring all countries benefit from technological advancement, it said.

Other European Union countries were generally supportive of the proposal, with some raising questions about the governance and the fund’s exact goals.

Several EU countries and some non-EU countries, however, insisted that the proposal be considered in the context of mid- and long-term measures, in a redux of Wednesday’s talks on market-based measures, which they want to begin immediately.

“We believe the discussion on this proposal needs to be linked to the broader discussion of the next package of measures... and with an eye on the mid- and long-term measures,” Norway said.

This effort to bundle the IMRB in a broader discussion is an effort to accelerate the consideration of the mid to long term measures, which include MBMs.

But like the contentious debate on market-based measures, other governments took greater issue with the mandatory nature of the $2 per tonne payment, many of them tying it to potential impacts on states.

The US said while it was still considering the proposal, it has substantial concerns about the mandatory levy and cannot support such funding obligation through the IMO. Alternative funding options are needed for the proposal to move forward.

Brazil, one of the countries that had been opposed to starting market-based measure talks, did acknowledge the $5bn fund sponsors’ intention for the measure not to be market based.

“However, it is our belief and concern that in practice this charge will act a de facto carbon tax, thus penalising shipowners especially those who operate in remote areas far from their destination markets,” its delegation said.

Argentina and Chile also made similar points on the implications of the levy especially for distant countries.

The United Arab Emirates said any market-based proposal should be discussed with other mid- and long-term measures. It supported the establishment of an IMRB but with a voluntary levy.

India further claimed that the mandatory levy could hamper the shipping industry and even make it potentially uncompetitive compared to others.

Russia warned that mandatory levies would be disadvantageous for shipowners with longer haul voyages or operating in regions where weather conditions or presence of ice mean higher fuel consumption.

Russia's delegation also said it would be unable to support the mandatory payment if questions about "fair and equal access" to the technology emerging from the IMRB were not addressed.

The deliberations will continue with new proposals on the idea expected to come next year ahead of the next MEPC in June 2021.

If this week is any indication to go by, they will last well beyond that.

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**ANALYSIS**

# Post-Brexit freight trade set for bumpy ride

WITH the end of the UK's transition period from European Union trade rules set to end on December 31, there remains a significant lack of preparedness on the part of the trading community regarding the post-Brexit business landscape and the implementation of the systems that will be needed.

That's the view of Peter MacSwiney, chairman of Agency Sector Management, the UK customs clearance solutions provider, and co-chair of the UK's Joint Customs Consultative Committee Brexit group.

In February, the customs technology specialist urged businesses "to get the right software in place, or if you have the software, it might be that you need to get the automation in place to deal with the increased volume of (customs) entries that is predicted. It won't be easy; let's get on with it, and we need to start now".

Nine months on, Mr MacSwiney said that his call has gone largely unheeded.

"We've been totally underwhelmed by users wanting additional automation," he said. "And while we have a significant number of companies who have never done customs before asking us for a solution, the overall level of preparedness and readiness I have to say is poor.

"There seems to be no middle ground; we have users who are prepared and those who aren't. It seems that the majority are waiting to see what happens."

He said businesses have furloughed staff and the pandemic has made them nervous about spending money on computer equipment, software and recruiting additional staff.

He also pointed to the impact of several no-deal Brexit deadlines without any resolution, saying a certain weariness has set in which has fostered a "wait and see" outlook. This, he says, has led to preparations being put on hold until it becomes clear what is going to happen.

Mr MacSwiney expressed surprise at the result of a Lloyd's List/Lloyd's Loading List poll taken at a recent Brexit and Beyond webinar, which revealed that 45% of participants planned to handle customs declarations in-house, with 55% opting to outsource the function to a customs broker or forwarder.

"I'd like to know what the 45% think they are going have to do," he said. "We've had people apply for software and when we've explained to them what was required, they were taken aback. In an age where there is the assumption that we can do everything ourselves online — such as booking a flight — it has perhaps been a case of: 'what can be hard about a customs entry'? Isn't it just filling out a form?' The truth is there has been something of a rude awakening for many firms.

"Most of our users seem to be comfortable with the prospect of higher levels of business with existing customers as a result of the introduction of customs declarations. Where there is a degree of anxiety on their part is in taking on business from unknown customers whose preparations for the post-transitional period may be inadequate.

“We have a situation where a good many trading companies, even at this late stage, continue to underestimate the changes that lie ahead and are unclear on who has responsibility for what — be it the payment of duties and VAT. It is an absolute minefield and I think some forwarders are worried they could be left carrying the can if compliance is not respected.”

ASM has informed the UK tax authority that it would not be offering or supporting a software solution that uses the new Customs Declaration Service for shipments in and out of Northern Ireland, which is scheduled to go live on January 1 — with ASM highlighting “significant gaps in some aspects of required functionality”.

“At the moment, CDS is only scoped for between 50m to 80m customs declarations annually, far short of the anticipated volume it will be required to process post-Brexit. I think it is envisioned that the existing legacy system, Customs Handling of Import and Export Freight, will be the main option for some time to come.”

He dismissed any capacity issues with current system, underlining that it was more than capable of handling a far greater number of customs declarations than it was used to doing, following recent upgrades to its capacity.

“I am absolutely confident that it can handle between 400m to 450m declarations annually and that we can avoid things falling over. Of all the things we’re worried about, CHIEF isn’t one of them,” Mr MacSwiney said. “The new CDS has got a future, but it’s all about improving its volume capability — to handle several hundreds of millions of customs declarations annually. And that’s not a trivial challenge by any means, but a significant piece of work.

“However, I think the intermediary sector would advocate that this is feasible by the end of next year. A managed migration away from CHIEF to CDS during the next 14 months will be tricky but is nevertheless doable.”

His forecast for next year in trade terms is to “expect a bit of everything over the first three to six months, given the overall level of preparedness, before a broad recognition of the new customs procedures emerges.

“Hopefully, it won’t be the Wild West; but bottlenecks at the ports and truck queues are inevitable. The EU says it is going to impose strict controls from day one, but their businesses are no more prepared than ours, to be honest. Problems will be solved as we go along with a fair bit of slack on offer, gridlock being in no one’s interest.”

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## MARKETS

# European container freight rates continue upward surge

A SURGE in imports ahead of the festive season and front-loading before the end of the Brexit transition period has pushed freight rates into Europe and the UK’s congested ports to record highs.

Rates from Asia to northern Europe put on a further 9% last week, rising $136 to $1,644 per teu, a level not seen in nearly a decade, according to the Shanghai Containerised Freight Index. Asia-Mediterranean rates hit $1,797, up $123, or 7.3%, taking them to levels not seen since 2014.

The increases on the northern Europe and Mediterranean routes came after large jumps last week that saw rates rise 21% and 23% respectively.

“In the Europe route, the rebounding of the epidemic led to new round of anti-virus measures that stimulated the import of living necessities from overseas,” the Shanghai Shipping Exchange said.

“The cargo volume kept rising while the capacity supply was still in tight condition. Backed by the strong fundamentals, most carriers implemented new round of general rate increases that pushed the spot market rate upward significantly.”

Slot utilisation was close to full loading status, it said.

Analysts at Platts said that Asia to UK rates were spiking on demand ahead of the UK's exit from the European Union as importers sought to front-load ahead of the January 1 deadline.

"Coupled with this is the logistical delays seen at some UK ports, causing carriers to impose a congestion surcharge on both inbound and outbound containers from the UK, further increasing costs for shippers," Platts said.

"This spike in demand has come at an opportune moment for carriers who are currently seeing services at almost 100% capacity and, with very few blank sailing in place, there is some optimism from the supply side of the market that these rates can be sustained into the new year."

Carriers have taken advantage of the strong demand, with CMA CGM announcing a $600 per feu peak season surcharge for shipments from all Asian ports to all destinations in the Mediterranean.

Hapag-Lloyd also pushed through a GRI announcement for December 1, nominating rate hikes for sailings from Asia of $5,190 per feu to the UK, $4,710 per feu to the Mediterranean and $4,690 per feu to northern Europe.

Platts warned, however, that as well as higher prices, shippers could face further issues due to the equipment shortage in Asia.

"This has stemmed from a lack of empty boxes at key exporting hubs, owing to the delay in returning these boxes as ports and importers operate skeleton staff levels during the pandemic," Platts said.

"This has meant carriers are keen to return empty boxes to Asia to clear the demand backlog that they are continuing to try and reduce, and so backhaul rates have not seen the same upside as headhaul rates on these routes."

# Forwarders call for action on detention and demurrage

THE British International Freight Association and the International Federation of Freight Forwarders Associations are calling for governments to investigate the reasonableness of these practices in the container shipping sector.

The two organisations want to see wider adoption of the key considerations set out by the US Federal Maritime Commission and investigations of the reasonableness of detention and demurrage charges.

The FMC issued new guidance earlier this year on how it will assess the D&D regulations and practices of ocean carriers and terminal operators.

Under the new rule, the FMC said it would consider the extent to which D&D charges and policies "serve their primary purpose of incentivising the movement of cargo and promoting freight fluidity".

BIFA director-general Robert Keen said that freight forwarders and the shippers were "reeling" from unjust demurrage fees linked to congestion in ports around the world.

"They should not be penalised by demurrage and detention practices when circumstances are such that they cannot retrieve containers from, or return containers to, terminals because, under those circumstances, the charges cannot serve their incentive function," said Mr Keen.

The FMC's decision came after a six-year investigation that concluded there had most likely been a long history of unjust and unfair D&D practices.

"If the FMC has identified demurrage and detention practices that are likely to be considered as unjust for the US, these practices are also unjust and unreasonable for the rest of the world," added Mr Keen.

"It is wrong for container shipping lines not to respect the interpretative rule introduced by the FMC in May that sought to govern conflicts on the issue of demurrage and detention fees."

He called for governments to take greater oversight regarding D&D practices and ensure they were good for the economy.

"It is crucial to ensure fluidity and good function of the supply chain, in unprecedented times as illustrated by the coronavirus and the chaotic state of international container shipping at present."

## IN OTHER NEWS

### Golar LNG and BV team up on floating ammonia research

GOLAR LNG and Black & Veatch Corp are joining forces to research floating applications for production of next generation fuels and carbon capture.

Golar LNG said it signed an agreement with B&V on Thursday to collaborate on joint research on floating ammonia production, carbon capture, green liquefied natural gas and hydrogen.

The two companies aim to jointly publish a paper on floating production of blue ammonia with carbon capture and storage before the end of the year.

### IMO approves HFO ban in the Arctic Sea

THE International Maritime Organization has approved a ban on the use and carriage of heavy fuel oil in the Arctic Sea.

The organisation's Marine Environment Protection Committee approved a ban this week to minimise the potential of an oil spill in the Arctic Sea and to help cut down the black carbon emissions which are especially harmful to icy regions.

If it is adopted by the next MEPC, in June 2021, it will come into effect in July 2024. However, ships flying the flags Arctic coastal states and operating in those states' sovereign waters get a waiver until July 1, 2029.

### Rainmaking conquers start-up challenge in Singapore

TRYING to develop start-ups in the maritime sector in Singapore may be seen as a challenge, but venture development firm Rainmaking believes it has found the right approach to make it work.

This starts with a recognition of the environment one needs to work in, something of which Shaun Hon, director at Rainmaking Transport, Southeast Asia's first corporate venture builder for the maritime industry, is well aware.

A less entrepreneurial culture compared to the West and the preponderance of government-linked companies are acknowledged facts of life in this space, but are not issues he sees as insurmountable, Mr Hon told Lloyd's List.

### Hafnia sees consolidation as future of product tanker market

HAFNIA, a product tanker owner in the BW Group, maintains that consolidation in the sector is required.

"Hafnia still believes that further consolidation is needed within the product tanker sector to fully unleash value and synergies from additional operational scale," said chief executive Mikael Skov in an earnings statement.

The owner had tried to take over Ardmore earlier in the year, but the offer was rejected on the basis that it was too low. The combination would have created the largest product tanker owner in the world.

### Zhuhai completes $270m buyout of rival port

PORT of Zhuhai, a major feeder port in southern China, has completed its takeover of a smaller rival in the east of the country as part of its expansion plan.

Privately run Xinghua Port Holdings was delisted from the Hong Kong Stock Exchange on Friday, having become a wholly owned subsidiary of state-owned Zhuhai Port Holdings Group, according to an exchange filing.

The acquisition deal was proposed in July with a cash payment of HK$2.1bn ($273m).

### Avenir LNG chief executive resigns

AVENIR LNG, a small liquefied natural gas company, said that chief executive Milorad Doljanin has resigned.

The company, which is backed by Stolt-Nielsen, Golar LNG and Höegh LNG, has been developing rapidly in trying to make a mark in the small-scale space since being formed in 2018.

Mr Doljanin, with 15 years of LNG trading and commercial experience, will be replaced by chief commercial officer Peter Mackey on an interim basis.

### DSIC wins shuttle tanker order from Chinese owner

DALIAN Shipbuilding Industry Co has won an order for a 155,000 dwt shuttle tanker from domestic owner Shanghai Northsea Shipping.

The deal also includes an option for another ship of the same type, according to a yard release. Price and delivery schedule were not disclosed.

DSIC, part of China State Shipbuilding Corp, said the newbuilding marks the first suezmax shuttle tanker ordered by a Chinese owner.

**Classified notices follow on the next pages**

**THE KEADBY 3 LOW CARBON GAS POWER STATION PROJECT**

**The Planning Act 2008 - Section 48 'Duty to publicise'**

**The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 4 (as amended)**

**The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 - Regulation 13**

**Notice of Proposed Application for a Development Consent Order for the Keadby 3 Low Carbon Gas Power Station Project**

1. Notice is hereby given that SSE Generation Limited (the 'Applicant'), whose registered office is No.1 Forbury Place, 43 Forbury Road, Reading, RG1 3JH, intends to submit an application (the 'Proposed Application') to the Secretary of State for Business, Energy and Industrial Strategy (the 'SoS') for a Development Consent Order ('DCO') under Section 37 'Applications for orders granting development consent' of the Planning Act 2008 (the 'PA 2008'), to authorise the construction, operation and maintenance of a low carbon Combined Cycle Gas Turbine (CCGT) power station with a capacity of up to 910 megawatts electrical ('MWe') gross output and associated development (together the 'Keadby 3 Low Carbon Gas Power Station Project' or 'the Project').

2. The land required for the Keadby 3 Low Carbon Gas Power Station Project (the 'Project Site') comprises of land at and in the vicinity of the existing Keadby power stations (Keadby 1 and Keadby 2) near Scunthorpe in North Lincolnshire, at grid reference 482351 411796. In total the Project Site extends to approximately 88 hectares ('ha').

3. The Project Site also includes space required for water connection corridors, an electrical connection, waterborne transport off-loading area, indicative laydown area and land at Keadby 1 and Keadby 2 to utilise existing connections and other associated infrastructure.

4. The Project will comprise a low carbon gas fired power station with a gross electrical output capacity of up to 910MWe and associated buildings, structures and plant, including:

- a carbon capture enabled electricity generating station including a CCGT plant with integrated cooling infrastructure and carbon and compression plant (CCP), including compression equipment and associated utilities, various pipework, water treatment plant, wastewater treatment, firefighting equipment, emergency diesel generator, control room, workshops, stores and gatehouse, chemical storage facilities, other minor infrastructure and auxiliaries/ services, and natural gas receiving facility (all located in the **Proposed Power and Carbon Capture (PCC) Site**);
- natural gas pipeline from the existing National Grid Gas high pressure (HP) gas pipeline within the Proposed Development Site to supply the Proposed PCC Site including an above ground installation (AGI) for both National Grid Gas's apparatus and the Applicant's (**Gas Connection Corridor**);
- electrical connection works to and from the existing National Grid 400kV Substation (**Electrical Connection Area to National Grid 400kV Substation)** for export of power;
- Electrical connection from the existing Northern Powergrid 132kV Substation (**Potential Electrical Connection to Northern Powergrid 132kV Substation**) for supply of power to the Proposed PCC Site during start-up plant and equipment);
- Water Connection Corridors including:

- A water intake within the Stainforth and Keadby Canal, which could be utilised for cooling water and make-up water subject to ongoing engagement with the Canal and Rivers Trust and Environment Agency (**Canal Water Abstraction Option)**;
- In the event that water from the Stainforth and Keadby Canal is not available or there is insufficient capacity for provision of water for the Proposed Development, an intake to provide cooling and make-up water from the River Trent (**River Water Abstraction Option**);
- Disposal of used cooling water to the River Trent (**Water Discharge Corridor**);
- towns water connection pipeline from existing water supply within the Keadby Power Station for potable water;

- AGI for connection to third party $CO_2$ export infrastructure including compression facilities;
- permanent access to the Proposed Development Site from A18 and means of permanent emergency access via Chapel Lane, including improvement works to existing routes;
- a new surface water drainage system comprising pond(s) and/ or a tank or similar, including a new surface discharge connection to a drainage channel;
- associated development including:
  - temporary construction and laydown areas including contractor facilities and parking;
  - temporary retention, improvement and use of an existing Waterborne Transport Offloading Area and Additional Abnormal Indivisible Load (AIL) Route;
  - site preparation works;
  - pipeline and cable connections between parts of the site;
  - landscaping and biodiversity enhancement areas, internal access roads, roadways and footpaths;
  - a permanent laydown and turnaround area for maintenance;
  - gatehouses, security and fencing; and
  - lighting.

5. The DCO will also seek, if required, the compulsory acquisition of land and/or rights in, on, under or over land required for the Project and the temporary occupation of land for the Project.

6. Other powers that the DCO would seek, if required, include the extinguishment and/or overriding of easements and other rights over or affecting land required for the Project; the application and/or disapplication of legislation relevant to the Project; tree and hedgerow removal; the temporary stopping up or diversion of public footpaths during construction works; the permanent and temporary alterations to the highway network for and in the vicinity of the Project Site, and such ancillary, incidental and consequential works, provisions, permits, consents, waivers or releases as are necessary and convenient for the successful construction, operation and maintenance of the Project.

7. The Applicant has notified the SoS in writing under Regulation 8(1)(b) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') that it intends to provide an Environmental Statement ('ES') in respect of the Project. The Project is therefore 'EIA development' for the purposes of the EIA Regulations and an ES will form part of the Proposed Application.

8. Information so far compiled about the Project's environmental impacts is contained in a Preliminary Environmental Information ('PEI') Report and summarised in a Non-Technical Summary. This document and other documents relating to the Project, including plans and maps showing the nature and location of the Project ('the Consultation Documents'), are available to view or download free of charge from https://www.ssethermal.com/keadby3 (the 'Project Website') from Wednesday 25th November 2020 to 5pm on Wednesday 20th January 2021. This comprises a single website page, and the Consultation Documents will be labelled 'Stage 2 Consultation'.

9. Alternatively please telephone: Freephone 0800 211 8194 (24hr voicemail service) or email: consultation@keadby3.co.uk. Any details you provide to us will be subject to our Privacy Notice at the Project Website. You will be offered a paper copy of the Consultation Documents free of charge (with the exception of the full Preliminary Environmental Impact Report (PEIR) which will be charged at a maximum of £200), or a USB stick containing the Consultation Documents which will be supplied and posted to you free of charge; please allow a week for receipt of documents via these methods.

10. Due to the ongoing national restrictions to limit the spread of coronavirus, we are not depositing paper copies of the Consultation Documents at any local public venues (such as libraries and community centres) and this approach is consistent with recent modifications made to Regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

**Responding to this notice**

11. If you wish to respond to this notice or make comments or representations in respect of the Project, these should be sent to the Applicant. Please include your name and an address where any correspondence relating to the Project can be sent. Comments and representations may be submitted in the following ways:

**Feedback Form: at the Project Website (https://www.ssethermal.com/keadby3) or via https://keadby3.consultation.ai/**

**Email:** **consultation@keadby3.co.uk**

**Post:** **FREEPOST KEADBY 3**

**Telephone: Freephone 0800 211 8194. This is a voicemail based service and can be called 24hrs. Please leave your name and a telephone number.**

12. Any comments received will be analysed by the Applicant and any appointed agent of the Applicant, and copies may be made available in due course to the SoS, the Planning Inspectorate and other relevant statutory authorities so that regard can be had to your comments. For certain parties, those who own an interest in land or are affected by the Project, the Applicant is under a statutory duty to publish names and addresses as part of its DCO application. In respect of other people we will request that your personal details are not placed on public record and these will be held securely by the Applicant in accordance with the Data Protection Act 1998 and the General Data Protection Regulation and used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties. Please refer to our Privacy Notice at the Project Website.

13. Please note that all comments and representations must be received by the Applicant **no later than 5pm on Wednesday 20th January 2021.**

14. If you would like any further information in respect of this notice or the Project, please contact the Applicant using one of the contact methods set out above.

**SSE Generation Limited**

**November 2020**


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