GROUNDS OF CHALLENGE TO DRAX'S 2024 STRATEGIC REPORT

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Ground 1: Carbon Neutrality and Carbon Removals

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The 2024 Strategic Report contravenes the requirements of s. 414C(7)(a) of the Companies Act 2006 by setting a strategic aim for Drax to be a leader in carbon removals ("BECCS"), and continuing to refer to BECCS delivering negative emissions, yet failing to explain that in order for BECCS to deliver negative emissions, the biomass used needs to be carbon neutral, and not just "low carbon". This could materially affect the success of the BECCS/carbon removals projects that Drax intends to develop.	The 2024 Strategic Report states that one of Drax's strategic aims is to become a *"global leader in carbon removals"* (see, for example, page 15). Whilst Drax has therefore shifted away from aiming to be "carbon negative by 2030", the report makes clear that Drax is still intending to develop BECCS and it continues to maintain that BECCS can deliver negative emissions. It is a superficial change in language rather than a change in substance. The breach of s. 414C(7)(a) of the Companies Act set out in ground 1 of our complaint against the 2023 Strategic Report therefore applies fully to the 2024 Strategic Report. We do not repeat those arguments here and request the CRR to refer to the ground 1 rationale section in our original complaint document to evaluate the alleged breach in respect of the 2024 Strategic Report.	9, 12, 14, 29, 30, 31, 45, 50, 51, 52, 53, 80, 98, 105, 110, 111, 118	11, 15, 16, 17, 28, 29, 34, 38, 39, 40, 41, 58, 74, 81, 88, 90, 91 133
Recommendations			
To comply with the duty under s. 414C(7)(a) Companies Act 2006, Drax must, in this and future Strategic Reports: - Be transparent with investors that for BECCS to deliver real-world negative emissions requires the			

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biomass itself to be truly carbon neutral; - Provide the calculations and assumptions underpinning the assertions about BECCS delivering removals of CO2 from the atmosphere, and explain how these align, or do not align, with IPCC guidance on carbon reporting; and - Disclose that the IPCC has not yet developed a protocol for assigning ownership of CO2 stored belowground with BECCS and how this could affect Drax's future performance.			

Ground 2: Technological Uncertainties and BECCS Risks

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
The 2024 Strategic Report contravenes the requirements of s. 414C(7)(a) of the Companies Act 2006 by minimising the significant technological risks associated with BECCS. The Strategic Report fails to: a) adequately disclose the environmental and climate risks posed by BECCS, and b) inform investors about the rising costs of Drax's BECCS plans. This minimisation of risk could endanger the company's future success, representing a failure to report on a key factor "*likely to affect the future development, performance and position of the company's business*" in violation of s. 414C(7)(a).	While the 2024 Strategic Report does minimally acknowledge some *"risks and uncertainties"* surrounding BECCS technology (page 65) and Drax's related future plans, attributing them to domestic politics, geopolitics and market volatility (page 73), it omits altogether the well-recognised climate and environmental risks posed by BECCS, which have been well documented by the scientific community[1]. The Strategic Report also fails to address the rapidly rising costs of Drax's BECCS project, a critical factor for the project viability and, therefore, for Drax's future outlook. Energy think-tank Ember, in a report from January 2024, noted: *"If it were to proceed, Drax's proposed BECCS project would be extremely costly ... Previously, Ember estimated that Drax's proposed BECCS plant would cost UK energy bill payers £31.7 billion over a 25-year contract, equating to approximately £1.3 billion annually. However, recent increases in wood pellet prices (expected to*	53, 87, 97, 98, 105	41, 65, 72, 73, 74, 81

[1] See, for example, EASAC, Forest bioenergy update: BECCS and its role in integrated assessment models, 2022, p. 15: "*The continued high uncertainties summarized ... over how much and when any CDR [carbon dioxide removal] can be achieved through BECCS, and risks of perverse effects on climate, food, biodiversity and other critical Sustainable Development Goals*"

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	persist for at least the next two to three years and potentially longer) and new forecasts of future wood prices raise our estimate to £1.7 billion annually (a description of the methodology behind this calculation is included below). This doubling of the current subsidy would continue to be drawn from an additional cost on UK energy bills." These sustainability risks and rising costs of BECCS clearly constitute factors "*likely to affect the company's future development, performance and business position.*" By omitting them, the 2024 Strategic Report withholds material information necessary for investors to make informed decisions regarding Drax's BECCS plans. As demonstrated, this lack of transparency is contrary to s. 414C(7)(a) of the Companies Act 2006.		
Recommendations			
To rectify these deficiencies in line with s. 414C(7)(a) of the Companies Act 2006, Drax should ensure that the 2024 Strategic Report and future Strategic Reports: - Summarise the key information on the potential environmental risks associated with BECCS and			

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
how Drax intends to address these; and - Include sufficient information regarding the current cost estimates of Drax's BECCS plans, including any changes in those estimates.			

Ground 3: Lack of Transparency Regarding Sourcing Practices

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
Under s. 414C(7)(b) of the Companies Act 2006, the Strategic Report of a quoted company must include information about environmental matters, including the impact of the company's business on the environment, and details about any related company policies and their effectiveness. Drax's 2024 Strategic Report breaches these requirements by omitting critical information about its sourcing of wood pellets from old growth forests in British Columbia, including from areas with high biodiversity value and priority deferral areas meant to be protected. This omission is significant, given the environmental impact of these activities, which Drax was obliged to report.	In the 2024 Strategic Report, Drax repeatedly claims that its biomass is *"sustainable."* The opening statement in the *"Biomass Sourcing: Data Summary"* chapter on page 26 emphasises the importance of sustainable sourcing to Drax's business model: *"Drax has a long-term commitment to only utilise sustainable biomass in its production processes."* Page 24 then outlines Drax's intended next step with regards to its biomass sourcing: *"In 2025, we expect to publish a revised biomass sourcing policy with an explicit commitment that this applies to all biomass that Drax sources – whether this is for our pellet production, sold to third parties, used at Drax Power Station (including third-party purchased biomass), or potential future use in BECCS at Elimini."* The revised Biomass Sourcing Policy, published in March 2025, emphasises Drax's commitment to protect the natural environment. In relation to pellet sourcing, the policy stipulates that Drax's specific commitments to protect the environment include:	73	17, 22, 24, 26

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	• Sourcing biomass which does not degrade forests or ecosystems with identified high biodiversity or conservation value; • Not sourcing biomass from areas designated as high conservation value, unless a competent authority has identified a need for harvesting or other intervention for nature protection purposes; and • Sourcing biomass which avoids direct sourcing from designated areas of old growth (and primary forest) as defined by the relevant competent authority. Yet substantial publicly available evidence shows that Drax in fact sources wood for its pellet production from highly biodiverse forests, old-growth forests in British Columbia ("BC"), Canada - the company's second-largest source after the United States (p. 23). Canadian NGO Conservation North's February 2024 report "*Logging What's Left*"[2] found that of the BC logs reaching Drax's pellet facilities: • Almost 60% of logs with spatial data indicating origin came from areas where 10% or more was Old Growth forest;		

[2] Conservation North, "Logging What's Left", February 2024. Available at: https://conservationnorth.org/wpcontent/uploads/Drax-in-BC-report.pdf

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	• 42% came from areas where more than half was Old Growth forest; and • 10% came from areas where more than 90% was Old Growth forest. These figures are in direct contradiction with the sourcing commitments made by Drax in the Strategic Report. Additionally, page 22 of the Strategic Report claims that 31% Drax's 2024 feedstock was "*low-grade roundwood*," i.e. material "*unsuitable for use in a sawmill*". Conservation North, however, documents that most logs entering Drax's mills are pulp grade, meaning they are suitable for other uses, and thus contradicting Drax's claim. Moreover, according to the Report, about one-quarter of the woody material at Drax's BC pellet plants in 2023 came directly from logging operations, not sawmill residue. This directly contradicts Drax's statement that 81% of its feedstock from Canada comes from "*sawdust and other sawmill residues created when sawmills produce wood products used in construction and other industries*" (page 23). Images from both the Conservation North report and the Panorama documentary show whole tree trunks, not wood industry residues, arriving at Drax's mills.		

	At page 25 of the Strategic Report, Drax has inserted a case study relating to its wood sourcing from Canadian old growth forest. It claims as follows: *"In 2021, the Government of British Columbia introduced Old Growth Deferral Areas (OGDAs) as an interim measure before a new forest management approach could be agreed with First Nations.* *These began to be implemented in 2022 and are separate to Legal Old Growth Management Areas (OGMAs). Whilst the work to implement this interim policy alongside the permanent new forest management approach is continuing, Drax has made the decision to stop sourcing wood fibre directly from OGDAs, even if a legal harvest was subsequently granted".* The information in the case study box lacks credibility. If Drax had decided to stop sourcing wood fibre from OGDAs after their creation in 2021-22, it would have stated so in the 2022 and 2023 Strategic Reports. Neither of those reports mention this. Secondly, a decision to stop sourcing from certain forests is straightforward to implement, requiring little more than a message to be communicated to local managers that fibre is no longer to be taken from those areas. Yet the last sentence in the Case Study box reads *"[t]he implementation of this policy change is ongoing".* This in itself suggests that Drax may well still be sourcing from OGDAs, and yet not acknowledging the environmental impact of doing so contrary to s. 414C(7)(b).		

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	Drax's claims within the Strategic Report and its supporting documents are also starkly contradicted by a lobbying letter Drax sent in April 2024 to the Minister of Forests in British Columbia.[3] In this letter, covered in a story by the Financial Times, Drax acknowledges sourcing from old growth and primary forests, expressing concern that new EU legislation *"will likely result in a ban on sourcing and placing on the market of any material from old-growth and primary forest areas"* and warning that such a ban would adversely affect its business. Given the significant environmental impact of Drax's sourcing of wood from old-growth forests and of diverting pulp grade timber to pellets, these practices are "environmental matters" that s. 414C(7)(b) of the Companies Act 2006 requires Drax to disclose. The Strategic Report's omission of these matters, especially in light of contradictory evidence and Drax's own lobbying letter, shows that Drax's actual sourcing practices are inconsistent with its public statements on sourcing. This inconsistency is a clear breach of the requirement to report accurately on environmental policies and their effectiveness under s. 414C(7)(b).		

[3] See FOI Request - JED-2024-41201. Available at: https://www2.gov.bc.ca/enSearch/detail?id=7AFDBC16F15F42E289E9F7DDB0F80C40&recorduid=JED-2024-41201

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
Recommendations			
To rectify these deficiencies, Drax must ensure that the 2024 Strategic Report as well as future Strategic Reports provide complete and accurate information about Drax's biomass sourcing. This information should be rigorously verified against publicly available data from Canadian authorities, in order to avoid potential greenwashing.			
Since Biofuelwatch found that Drax received large numbers of log from private land, which sourcing cannot be assessed due to lack of publicly available data[4], Drax should voluntarily disclose sourcing data related to private land both in Canada and elsewhere to enhance transparency and accountability regarding its biomass sourcing practices.			

[4] Conservation North, "Logging What's Left", p.8.

Ground 4: Emissions Reporting and the Net Zero Ambition

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
Drax's 2024 Strategic Report breaches s. 414C(7)(a) and (b) of the Companies Act 2006 by failing to account for and report the single largest source of its value chain emissions, namely the biogenic emissions from harvesting and combusting the biomass. This undermines Drax's ambition to be net zero across its value chain by 2040 and is contrary to the Science Based Targets initiative ("SBTi") guidance on which the emissions reductions are based. Therefore, even if Drax meets its net zero objective, it will not in **absolute** terms have reached net zero, since its reported emissions do not account for the full impact of biogenic emissions from biomass. Consequently, Drax's approach will not align with the 1.5 °C temperature goal of the Paris Agreement. The inaccurate accounting and reporting of Drax's emission reductions create a risk to the future position of the company and minimise the	The 2024 Strategic Report fails to account for and report Drax's biogenic emissions produced by harvesting the wood, producing the wood pellets and burning them at the power station within its direct emission reduction targets, contrary to the accounting requirements to which it is subject. As repeatedly indicated across the 2024 Strategic Report, first on page 28, Drax reports its progress toward emission targets in line with guidance from the Science Based Targets initiative ("SBTi"). SBTi is a corporate climate action organization which *"develops standards, tools and guidance which allow companies to set greenhouse gas (GHG) emissions reductions targets in line with what is needed to keep global heating below catastrophic levels and reach net-zero by 2050 at latest"*. Page 40 of the Strategic Report contains a box headed *"Progress against SBTi targets"* which gives a target of a 75.7% reduction in Drax's direct carbon emissions by 2030 relative to the 2020 baseline. According to the table, in 2024 Drax had reduced its direct emissions by 87%, thereby already exceeding its 2030 target. Drax is only able to claim this level of reduction in its direct carbon emissions because it has excluded all its direct biogenic carbon emissions from the equation. Yet the Strategic Report does not explain that this emissions reduction is based on	50, 52, 53, 54, 55, 73	27, 38, 39, 40, 41, 42, 43

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
environmental impact of its activities.	excluding biogenic emissions, which Drax reports at page 38 as being 13,276 ktCO2e.[5] As in the 2023 Strategic Report, Drax's justification for this exclusion of biogenic carbon emissions is that *"[t]he biogenic CO_2 emissions across the Group are zero-rated under the GHG Protocol methodology and our SBTi targets"*.[6] However, this statement is inaccurate. Neither the GHG Protocol methodology nor the SBTi "zero-rate" biogenic carbon emissions from bioenergy. The GHG Protocol methodology simply states that biogenic carbon emissions should be reported separately from emissions reported under the scopes.[7] The SBTi's guidance for the power sector requires including biogenic emissions in target setting and progress reporting: *"BIOENERGY ACCOUNTING:* ***Direct emissions from the combustion of biomass*** *and biofuels, as well as GHG removals associated with bioenergy feedstock,* ***<u>must</u> be included alongside the company's inventory and <u>must</u> be included in the target boundary <u>when setting a science-based target and when reporting progress against that target</u>. If biogenic emissions from biomass and***		

[5] Drax 2024 Strategic Report, p. 38.

[6] Ibid, footnote 4.

[7] The GHG Protocol for corporate accounting: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf, p. 25 and 63.

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	biofuels are considered climate neutral, the company must provide justification of the underlying assumptions."[8] (Emphasis added) Contrary to the above, Drax's Strategic Report reports progress against its SBTi emission reduction targets without any reference to biogenic carbon emissions. Those emissions appear neither to have been taken into account in the setting of the science-based target, nor in reporting progress against meeting that target. Furthermore, while Drax's stated position in the Strategic Report is that its bioenergy production is *"low carbon"*, and Drax no longer claims its biomass is *climate neutral"*, this is a distinction without a difference. Drax has not provided a valid rationale for counting biomass as having zero biogenic emissions, as discussed elsewhere. The importance of Drax's exclusion of its biogenic emissions from its emissions reduction calculations is that, were they included in Drax's SBTi targets and reporting, Drax would be seen to be emitting more CO_2 per MWh of electricity than when it burned coal. Furthermore, Drax would be a very long way from meeting its net zero by 2040 ambition, and the fulfilment of this target would seem unlikely to be met. Given the prominence of the *"net zero by 2040"* ambition in the Strategic Report, this omission clearly has the potential to discredit Drax and its "climate		

8 SBTi Guidance for the power sector: https://sciencebasedtargets.org/resources/legacy/2020/06/SBTi-Power-Sector-15C-guide-FINAL.pdf, p. 10.

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	positive" objectives in the future, thereby jeopardising the position of the company. This therefore amounts to a breach of s. 414C(7)(a). Furthermore, this omission means that the Strategic Report fundamentally misrepresents Drax's progress in reducing its carbon emissions and drastically downplays the environmental impact of its activities. This is clearly contrary to s. 414C(7)(b).		
Recommendations			
To comply with s. 414C(7)(b), the 2024 Strategic Report must: - Include Drax's emission reductions based on calculations including its largest source of direct emissions, biogenic carbon, in line with SBTi requirements; and - Disclose the emissions rate when biogenic emissions are included and provide information on the amount of electricity generated each year, enabling verification of these calculations.			

Ground 5: Pellet Pollution Incidents

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
Drax has breached section 414C(7)(b) of the Companies Act 2006 insofar as its Strategic Report fails to provide sufficient information about the extent to which Drax's pellet production operations violated environmental regulations and adversely impacted the environment.	The 2024 Strategic Report breaches s. 414C(7)(b) of the Companies Act 2006 because it provides insufficient information on the significant environmental violations associated with Drax's pellet-production in the US. It provides updates on the notices of violation at the Amite plant in Mississippi that were referenced in the 2023 Strategic Report as follows: • On pages 49 and 102, the 2024 Strategic Report notes an Agreed Order with the Mississippi Department of Environmental Quality (MDEQ) arising from (i) a permit exceedance of hazardous-air-pollutant limits and (ii) a failure to conduct an emissions-performance test within the prescribed period. As part of the settlement, Drax agreed to pay a civil penalty and to complete a supplemental environmental project. • On page 55, the report states that, in 2024, a Community Advisory Panel was established in Gloster, Mississippi to provide input on local funding priorities, with a roll-out to all communities planned for 2025-26. Additionally, page 49 of the 2024 Strategic Report records that Drax responded to SEPA feedback on odour emissions	34, 45, 61	33, 49, 55, 102

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	following its acquisition of the Daldowie Fuel Plant in 2024. Despite these disclosures, the Strategic Report fails to report the full extent of Drax's environmental violations, thereby breaching the statutory requirement in s. 414C(7)(b) of the Companies Act 2006. In particular, it omits: • The $225,000 fine imposed in 2024 on Drax for releasing 50% over its permitted limit of hazardous air pollutants (HAPs) at its mill in Gloster, Mississippi;[9] • Any reference to the dispute resolution discussions that Drax entered into in March 2024 with Louisiana regulators over further emissions breaches at one of its Louisiana pellet mills – a process likely to result in the largest U.S. fine Drax has faced;[10] and • Details of seven additional environmental violations that occurred in 2024 at Drax's		

[9] A. Rozier, "*Drax receives another fine for air pollution violations in Gloster",* Mississippi Today, 12 September 2024, available at https://mississippitoday.org/2024/09/12/drax-receives-another-fine-for-air-pollution-violations-in-gloster/

[10] C. Corcoran, "*Drax-owned facilities broke environmental rules more than 11,000 times in the US*", Land and Climate Review, November 2024, available at: https://www.landclimate.org/drax-usa-11000/

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	Morehouse, Amite and Longview plants. These involved exceedances of various effluents limits and construction undertaken before the requisite air-permit was issued. By omitting these critical matters, Drax's 2024 Strategic Report breaches s. 414C(7)(b) of the Companies Act 2006 and deprives stakeholders of the information necessary to assess the full scale of Drax's environmental non-compliance.		
Recommendations			
Complying with the duty under s. 414C(7)(b) Companies Act 2006 requires Drax in its present and future Strategic Reports to: - Provide complete and accurate information about instances of environmental non-compliance related to its operations; and - Include information regarding the environmental harms resulting from its violations, such as worsening air quality and impacts on local communities and ecosystems near its facilities.			

Ground 6: The Carbon Cycle, Forestry and "Sustainable Wood Pellets"

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
The 2024 Strategic Report breaches section 414C(7)(b) of the Companies Act 2006 by giving an inaccurate portrayal of the carbon and climate impacts of Drax's wood sourcing for its pellets. This inaccurate portrayal minimises the environmental impact of Drax's wood sourcing.	The Strategic Report makes a number of statements that are false and/or misleading, and which have the effect of minimising the impact of Drax's activities on the environment. For example, on page 17, in justifying sourcing some of its wood for pellets from thinning in the US Southeast (thinning involves logging a selection of trees from the forest, thereby reducing the forest density), the Strategic Report states: *"If forests were not thinned, the revenue from sawlogs would be reduced and landowners may consider other uses for their land, such as agricultural crops and livestock farming. The management of forestland to produce sawlogs ensures forests are growing and absorbing carbon, which means forests remain a carbon sink".* In other words, Drax is claiming that a) thinning forests avoids deforestation (as otherwise the land use would be changed to an agricultural use), and b) commercial forestry is necessary to ensure forests both grow and continue to absorb carbon. It is striking that Drax provides no sources for these claims, which is unsurprising given that they are grossly overly simplistic, and obviously so. Thinning is a practice in respect of which there is conflicting evidence as		17, 26, 27

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	to its advantages and disadvantages for forest health and climate mitigation. By making these claims, the Strategic Report is propounding misinformation which seeks to present Drax logging of trees for wood pellets as positive for the environment, rather than as potentially harmful to it. In order to comply with s. 414C(7)(b), Drax is required to present a balanced and evidence-based picture of its wood sourcing practices and their effect on the environment. Where there are negative environmental impacts, it is also required to set out the steps that it takes to minimise/counterbalance those negative impacts. On page 27, the Strategic Report contains a graphic entitled *"The carbon cycle: Biomass and BECCS"*. This graphic purports to show that woody biomass generation has a net positive environmental impact and is superior to fossil fuel generation. The graphic is misleading. One part of the graphic states, *"When biomass is burned for energy generation, it releases the same CO_2 that was absorbed during the plant's lifetime.*"* While this may be true, it is a fact that is also true for coal, and thus is irrelevant to the next climate impact of converting forest carbon into atmospheric CO_2. The footnote attached to the *"*"* provides a caveat: *As long as wood pellets are sourced from areas that are managed to maintain or increase productive forest cover, CO_2 emissions and forest uptake will balance on climate relevant timescales"*. There are several problems with this statement: First, "balancing" CO_2 emissions and forest carbon uptake implies that there		

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	is a forest carbon sink of zero. Thus, if a forest was growing and sequestering net CO_2, and it is logged so that eventually over time there will be a "balance" of emissions and uptake, this results in a reduction in forest CO_2 uptake, which from the atmosphere's point of view is the same as an increase in emissions. Second, there is no indication as to what Drax considers *"climate relevant timescales"* to be, and whether those align with those of the Intergovernmental Panel on Climate Change and international climate change agreements. This means that the veracity of the claim cannot be ascertained. Additionally, it is misleading to imply that maintaining or increasing forest "cover" is most relevant to climate mitigation. Areas with as little as 10% tree cover can be classified as forests. What is important for CO_2 uptake and storage by forests is not just the areal extent of forests, but their density, and the amount of CO_2 taken up in any given year. Thus, for example, in 2024, Estonia was the fifth largest contributor of wood pellets to Drax according to the table on page 26. The total area of forest in Estonia is not changing much, but due to heavy logging, in part for bioenergy, Estonia has lost its forest carbon sink.[11] Therefore, here the Strategic Report is misleading by a) pointing to a metric – forest cover – that is not a proxy for		

[11] Booth, M. S., Giuntoli J. 2025 -"Burning Up the Carbon Sink: How the EU's Forest Biomass Policy Undermines Climate Mitigation". GCB Bioenergy. Available at: https://onlinelibrary.wiley.com/doi/full/10.1111/gcbb.70035?msockid=1dbe45360dc26049099850ea0c6c61e0.

Ground of Challenge	Rationale	Relevant Pages in 2023 Strategic Report	Relevant Pages in 2024 Strategic Report
	the forest carbon sink, and b) failing to highlight the actual reduction in the forest carbon sink in countries from which it sources pellets.		
Recommendations			
To comply with s. 414C(7)(b), the 2024 Strategic Report and all future Strategic Report must: - Cease the practice of greenwashing the negative impacts of Drax's wood sourcing activities, and instead provide balanced, accurate and scientifically referenced information for investors about the environmental impacts of making and burning wood pellets; - Set out the steps that Drax takes, or will take, to address the negative impacts on the environment of its wood sourcing; and - Provide accurate, complete and scientifically referenced information about the relative			

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climate impacts of woody biomass generation versus fossil fuel combustion, based on full lifecycle emissions that includes all biogenic emissions.			