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Gdańsk, 08/07/2010 r.

Mr Tomasz Dabrowski

Director of the Energy Department Ministry of Economy of Poland

Dear Sir,

We are writing to thank you very much for the invitation to the workshops on finalization of the Polish National Action Plan (NAP) for renewable energy sources (RES), which was held on 5^{th} of July 2010 in Warsaw, Poland. We would also like to express our full support for the *Pomeranian Cluster 3x20* and *Polish Coordination Chamber* remarks to the Polish NAP, with respect to biomass-based distributed cogeneration.

Co-firing of biomass and coal in big-scale energy generation systems is reported to cause numerous difficulties, with respect to the process efficiency as well as regarding the doubtful aspect of sustainable development. Co-firing of biomass and coal in big-scale energy generation systems usually results in the decrease of the system efficiency (by a few percent on average) and problems with contamination of the installation. It can be assumed, that without significants incomes from the energy certificates, such procedures would be terminated. Additionally, the necessity of biomass transport for long distances questions the final effect of the decreased green house gases emission and thus questions the whole concept of sustainable bioenergy production (especially in the light of the recently published EU criteria). Big-scale energy systems deform biomass market, which makes development of local, distributed energy systems more difficult. The latter seems, according to the current state of knowledge, to be the most efficient way for utilization of renewable energy sources, which enables development of regional economies and improves the security of energy supply.

Considering the above, the biomass-based distributed cogeneration should be adequately emphasized and promoted in the Polish NAP. We are simultaneously aware of







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the fact, that investments realized in central energy systems in the previous years, according to the previous laws and regulations, cannot be now deprived of the possibility for financial pay-back. Otherwise this would result in the loss of trust of investers in the decisions made by the Polish government. We are also aware of the fact that co-firing of biomass and coal in a bg-scale energy systems is surely an effective way towards reaching the required percentage of energy produced from RES, which we are obiged to achive by 2020.

Nevertheless, we believe and posulate that while setting directions for Polish National Renewables Action Plan (NREAP), the newest trends in the research and EU policy should be taken into consideration and reflected in the first place. Therefore, we believe that the following statement, similar to the remark #65 made by the Polish Coordination Council, should be incorporated into the Polish NREAP: ... support for co-firing of biomass with non-renewable energy sources in centralized energy systems will be limited and support for distirbuted generation systems will be increased.

Summing up, we would like to underline, that Institute of Fluid-Flow Machinery Polish Academy of Sciences (IFFM PASci) in Gdańsk is currently carrying out intensive research in the field of distributed energy generation based on biomass within governmental projects (such as so-called "key" and "strategic" projects). IFFM PASci is also actively participating in international projects, including Baltic Sea Region projects, such as "Bioenergy Promotion". Attached please find guidelines/documents prepared within the latter project (under WP3 Strategy), with respect to the NREAPs and sustainable bioenergy production.

Yours sincerely,

Associate Professor Adam Cenian Dr Dariusz Kardas Associate Professor Piotr Lampart Professor Jan Kicinski









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