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Submitted to **Future Support for Low Carbon Heat**
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About you

What is your name?

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What is your organisation?

Organisation:
Bennamann Ltd

Additional information about your organisation:
Bennamann Ltd is an SME company researching, developing, manufacturing, marketing and deploying innovative technology for the production, distribution and use of net zero-carbon biomethane from organic waste streams, including farm manure slurry and cut grass. The company's innovations include patented fuel tanks for storage, transport and use of liquid biomethane; equipment to process and liquify biomethane at small-scale off-gas-grid and off-power-grid locally; proprietary engineering for optimised small-scale anaerobic digestion (AD); and satellite enabled technology for optimised biomethane sourcing from grassland, as well as Internet of Things (IoT) enabled equipment monitoring, control, diagnosis, metering and customer billing.

Are you happy for your response to be published?

Yes

Would you like to be contacted when the consultation response is published?

Yes

Green gas - Digestate

12 What measures and technologies exist for reducing ammonia emissions from digestate and what are the barriers to their widespread deployment?

Please provide evidence to support your response:
Current methods employed in agriculture to reduce ammonia emissions are focused on application and storage methods.

Low emission/loss application techniques include dribble bar, trailing shoe, shallow and deep injection. Dribble bar and trailing shoe are gaining in popularity and place the digestate close to the ground surface beneath plant foliage, which reduces the surface area of the applied digestate. This has advantages over traditional splash plate spreading (cheapest from a cost of equipment point of view) which produces vast amounts of tiny droplets that fall on all plant and soil surfaces, increasing the surface area and potential for the volatile ammonia to gas-off. The shallow and deep injection techniques work by placing digestate under the soil surface to minimise losses. Emissions of ammonia from the storage of liquid manures (ie slurry) and digestate can be reduced to near zero by using sealed storage vessels.

Barriers to the greater use of ammonia emissions reduction techniques centre around cost of equipment, the scale of available AD systems and the perceived value of the digestate amongst farmers and growers, when compared to artificial fertilisers. In the case of cost barriers for example, the cost of ammonia mitigating storage systems is commercially challenging for farm businesses when compared to conventional open clay lined pits (≈£5/m3) - a slurry bag (non-Lagoon AD) system costing ≈£29/m3.

To remove these barriers solutions are required that are commercially attractive to farm businesses, as well as a change in farming practices to those based on methods that promote the efficient utilisation of recycled nutrients and prevent losses, along with awareness raising of the benefits of such an approach.

Bennamann Ltd, based in Cornwall, has developed a slurry lagoon AD, biogas processing (upgrading) and digestate processing system that helps to remove the barriers by providing the financial incentive to invest in and adopt low ammonia emissions techniques and practices. We take a fundamentally different approach to using digestate, recognising that how farmers and growers view the role of nutrient cycling must change in order to achieve a system which regenerates the productive capacity of soils. A system that replaces what is exported off the farm (i.e. the nutrition & energy embedded in food products) with what is locally available from natural resources - the sun, rain and nutrients accessible in the local natural environment. To help achieve this, we are developing a secondary process which uses digestate as a growth medium and food source for a diverse range of beneficial microorganisms. When deposited in the ground these communities form the basis of the soil food web and provide the starting blocks for the natural processes that carry out the extraction and mobilisation of minerals and nutrients, in turn making them readily available to the surface plant life (grass, crops and other vegetation).

Field scale trials have demonstrated that this approach will, when combined with production methods that promote diversity and low disturbance, outperform conventional practice in terms of yield, cost of production and nutritional value of the crop.

Other benefits from this approach have been identified during its development:

• The microorganisms consume and lock up nutrients within their biomass, thus reducing the pollution potential of the raw digestate - both in terms of volatile compounds, such as Ammonia, and water-soluble nutrients which could otherwise be lost at application and during weather events.
• Nutrients will be delivered back to the growing crop by natural biological processes (we have targeted indigenous species which form relationships within local natural cycles).
• The process reduces the volume required to be stored and applied back to the land.
• By establishing these early trophic level species back into soils in a balanced community and managing land in a way which mimics natural cycles, we can build productive soils which will utilise rainfall water more effectively. Thereby increasing resilience to changing weather patterns and enabling climate adaptive agriculture in a warming world.
• This systems approach to farming will sequester and deep cycle large amounts of carbon.

The value added to the biogas by the Bennamann system (see answer to question 19), and its flexibility in processing (upgrading) to biomethane at small-scale, opens AD and efficient nutrient cycling through digestate to farms which have otherwise been constrained by the scale and cost of conventional AD as well as current business models. Bennamann's proprietary biomethane storage technologies, which enable local off-grid distribution of the resulting energy products, have also radically changed the AD opportunity for farms without gas-grid access and/or power grid connection/constraint issues.

13 What are the reasons for the lack of commercial demand for digestate and how can the market for digestate be strengthened?

Please provide evidence to support your response:
Reasons for the lack of commercial demand for digestate include:

1. Inadequate education/marketing of the potential of digestate.
2. Lack of clarity when comparing the savings that digestate can deliver against the true costs of nitrogen, both financial and environmental.
3. Absence of information on recommended uses of digestate and the benefits of its application on different crops/plants.
4. The ammonia burden of current application techniques is too high an environmental 'price' for some potential users. This 'price' can be reduced if the digestate is applied by the methods and techniques discussed in our answer to question 12.
5. The nature of a wet product and the transport and logistical challenges, including consideration of nutrient value vs. high tonnage.

However, digestate production within an agricultural AD operation should not result in a surplus. If manures and small amounts of organic farm waste are processed efficiently, then all digestate will be utilised on farm itself. Bennamann has taken a systems approach to farm scale AD and biogas processing (upgrading into gaseous and liquid biomethane energy products) and storage that, as described in our answer to question 12, results in a closed cycle circular economy model for commercially viable regenerative and sustainable agriculture. Through the application of the Bennamann system the 'internal on-site' market for digestate will be strengthened, not only leading to financial savings for farm businesses from reduced fertiliser and energy bills, but also savings in emissions of carbon dioxide as well as reduced ammonia release. For example, a dairy farm with 75 cows could save over £10,000 on fertiliser bills and 2.6 tonnes of carbon emissions; 250 cows could save £35,000 on fertiliser and 8.9 tonnes of carbon (while potentially earning around £11,500 per annum and £23,000 respectively from the sale of surplus energy production). A plethora of additional environmental and ecosystem benefits would also be simultaneously realised.

If you want to attach further evidence to support your response, please use this file upload function.

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Green gas - Interaction with other government schemes

17 Do you agree with our proposal to allow biomethane producers to decide how much biomethane they wish to claim Green Gas Support Scheme payments for within a given quarter?

Yes

Please provide evidence to support your response or provide an alternative proposal for scheme interaction:
Bennamann Ltd welcomes the proposal that the payment calculation formulae should be amended to allow for claiming across multiple schemes within a quarter for registered producers of biomethane. The ability for us to participate in the Green Gas Support Scheme in the same quarter as receiving RTFCs will certainly give us greater flexibility to diversify our revenue streams and encourage us to maximise our production. We would however like clarification on the granularity of the discrete time periods that alternating claims can be made within - ie what will be the minimum block of time in any 24 hour period that we will be able to use to allocate production to one scheme or the other?

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Green gas - Barriers to deployment

18 What are the main barriers to the deployment of biomethane anaerobic digestion plants and what potential solutions could help to overcome these?

Please provide evidence to support your response:
The main barriers to the deployment of biomethane AD plants include:

1. The high costs of UK AD plants (in the UK most plants are designed, installed, and operated by European companies).
2. Unavailability of competitive, low tech, financially viable AD solutions.
3. The absence of commercially viable solutions for a small-scale AD and biogas upgrading plant system for on-farm applications.
4. The absence of a commercially attractive AD solution for farms without gas-grid access and/or power grid connection/constraint issues.
5. Perceptions of investment risk and inadequate return on investment.
6. Bio-security concerns about importing high energy waste streams to improve the financial viability of a plant.
7. A lack of research into alternative AD solutions.
8. An incentive scheme that is too coarse and does not provide adequate rewards for smaller plants/operators and those without gas-grid access and/or power grid connection/constraint issues.

To overcome barriers 1 – 7, Bennamann have, as detailed in our answers to questions 19 and 39, developed a suite of technologies covering the entire supply chain from AD to consumer application that facilitate sustainable, commercially viable off-grid small-scale biogas sourcing, processing/upgrading and storage, as well as distribution and consumer use without the requirement of a gas grid. We see using AD as the financial incentive for farmers to seek out sources of nutrients which will not only provide biomethane for gaseous or liquid fuel energy products, but also contribute as a component in a larger system. A system that aids agriculture's move to a more sustainable regenerative circular economy model by providing a responsible low risk nutrient collection, storage, and processing solution which enables efficient and viable nutrient cycling (see our answer to question 12).

Barrier 8 is for the UK Government to remove through the Green Gas Support Scheme and other biomethane support mechanisms.

If you want to attach further evidence to support your response, please use this file upload function.

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Green gas - Further information

19 Do you have views on how the Green Gas Support Scheme could be improved, beyond the ways described in this consultation?

Please provide evidence to support your response:
Bennamann Ltd regards as a missed opportunity the fact that the Green Gas Support Scheme is exclusively focussed on supporting biomethane injection into the gas grid and does not propose to support off-grid sourcing, processing/upgrading, storage and distribution of biomethane in gas or liquid fuel form. The Committee on Climate Change (CCC) consider the production of biomethane from waste as a low-regrets option, recommending continued government support. The lack of this support for the off-grid component of production is not only remiss, but also ignores the full low-regrets potential of biomethane to reduce greenhouse gas and other emissions (including ammonia and N2O) from waste and agriculture, as well as support jobs in rural areas, reduce fuel poverty and build rural energy security and resilience capacity, through its local sourcing, processing and distribution for heating.

Across the UK, rural communities have within them a considerable untapped resource of energy in the form of the biogas that can be derived from farm manures and/or the grass cuttings that result from a wide range of existing rural grassland management operations (for example, maintenance of roadside verges, community playing fields and sports fields, golf courses, country hotels etc). In many cases these sources of energy are relatively small, being at the farm or village/community scale, but when sourced, processed to produce biomethane, and used on-site or aggregated and distributed locally to meet local rural demand, they represent a considerable opportunity for decarbonisation. The challenge is, however, how to access this unused zero-carbon source of energy when the rural production site is small-scale, is not served by a biomethane injection point to the gas grid, and in many cases suffers power grid connectivity constraints preventing its production and/or export as electricity. To meet this challenge, Bennamann Ltd have been developing technical solutions and business models that enable commercially viable utilisation of these local rural energy resources, in the form of compressed biomethane gas and liquid biomethane fuel, for the affordable decarbonisation of space and water heating in homes and buildings (ie farms, community halls, schools, businesses etc). Supporting off-grid production and distribution of biomethane in the Green Gas Support Scheme would help incentivise the growth of a local zero-carbon energy production and distribution economy in the UK's rural off-gas-grid and power grid constrained communities.

The commercial roll-out of rural off-grid biomethane provision for heat based on a local supply of biogas, sourced from cut grass or manure slurry AD and processed in small-scale upgrading plants, is scalable and viable in the UK. For example, there are circa 600 dairy farmers alone in the rural county of Cornwall (131,000 dairy cattle – 6% of the national herd), many of whom are off-gas grid and subject to power grid constraints. Of these, there are an estimated 120 farmers in a position to participate in the short-term, including the 58 dairy farms in Cornwall Council's own Farm Estate. Indeed, in the case of the latter, the Council has already committed in principle to a pilot installation of Bennamann Ltd's farm-scale biogas sourcing, processing and distribution technology on 6 of the dairy farms in their Estate which, if successful, is intended to lead to a wider roll-out across the county. Beyond the use of the biomethane for space and water heating on the farm sites themselves, the current estimate for off-gas-grid properties (domestic and non-domestic) in Cornwall is 54% (166,487 properties), the majority of which are in rural settings with limited, or no, economically and technically viable low carbon options for heat provision. Typically, solutions proposed for such properties start with technologies for the electrification of heat provision, such as heat pumps and hybrid heat pumps, but these can exacerbate rural fuel poverty issues (particularly in the case of Air-Sourced Heat Pumps, ASHP, which can be relatively expensive to run) and are technically challenging to deliver across an area with significant power grid constraints and limited capacity. Other options are extremely limited and include biomass boilers but, as recognised by the UK Government, there are air quality and sustainability concerns associated with this solution. This situation is mirrored across rural UK and in this regard, as stated in the Consultation document, the Government's own modelling work suggests that, for the domestic sector alone, around 20% of off gas grid fossil fuel homes are not currently suitable for low temperature heat pumps and are better suited to high temperature heating, such as high temperature heat pumps, biomass or combustion of biogas.

In terms of scalability across the UK, there are circa 2,000 dairy farms in the South-West and around 29,000 holdings in the UK have <150 cattle, which

constitutes 71% of the cattle farms in the UK (GOV.UK, 2015). With current farming practices, current AD costs and current level of low-carbon energy incentives, a model developed by Mistry (2012), shows that only 3.5% of UK dairy livestock would be linked to economically viable on-farm plants (currently there are only 45 small scale ADs in the UK, ABDA, 2015). Alternatively, Bennamann's farm-scale biogas sourcing (AD), processing, storage and distribution technology would enable 71% of UK dairy farms to become economically viable local zero-carbon energy producers. This would potentially result in a carbon emissions saving of circa 155,000 tonnes CO2 annually for the UK, just from the mitigation of the manure slurry (fugitive) emissions, before accounting for the emissions savings that will accrue through the use of the derived biomethane in decarbonisation of off-grid heat energy provision.

Incentivising a scalable roll-out, would not only help to reduce agricultural emissions, decarbonise off-gas-grid rural heating, reduce rural fuel poverty, improve rural energy security and build the resilience of rural communities, but also enable dairy farm businesses to generate an additional revenue stream that would provide them with income diversity and increased profitability. As volatile global milk prices continue to undermine confidence and dairy farmers ability to invest, this technology will offer a lifeline to small and medium size farms across the UK. In addition, incentivising biomethane production at the farm-scale for local distribution and use in heat provision would help improve the overall sustainability of farming through on-farm use of some of the resulting zero-carbon energy, as well as improved nutrient cycling and soil biology practices by use of the digestate as a replacement for artificial fertiliser (see our answer to question 12). The digestate can also be applied to the land using Bennamann's proprietary processes and methods (see our answers to question 12 and 13) which support regenerative agriculture and substantially reduce the release of ammonia, thereby mitigating air quality degradation. As a result, farm businesses will be able to become more sustainable in both an economic and environmental sense, with the social benefit of maintaining the viability of rural farming communities, and help deliver a circular economy model for agriculture.

The successful incentivisation through the Green Gas Support Scheme of local off-grid small-scale sourcing, processing/upgrading and storage of AD derived biogas for distribution in compressed biomethane gas or liquid biomethane fuel form, to be used in off-gas-grid heat energy provision, will help UK Government to realise:
- an attractive non-electric affordable zero-carbon heat option which is particularly beneficial for decarbonising off-gas-grid locations where building owners/occupiers resort to bottled gas (e.g propane) or oil for heating and/or power grid capacity and constraints are an issue in meeting electrical demand;
- decarbonisation of difficulty to tackle sectors, including heat and agriculture, in the quest to achieve zero-carbon by 2050 and meet the nation's Paris Agreement commitments;
- the uptake of zero carbon heat to deliver the heat component of the Clean Growth Strategy, which commits to the phase out of the installation of high carbon fossil fuel heating in buildings off the gas grid in the 2020s;
- commercial deployment of technologies consistent with the UK's national 'Industrial Strategy', the findings and recommendations of 'Smart Specialisation in England", the UK Government's 'Eight Great Technologies' and which support the Low Carbon Innovation Coordination Group strategic framework.
- the UK Renewable Energy Roadmap, which extensively considers the need for the supply and utilisation of renewable heat, by researching and innovating a new approach to the provision of off-grid bioheat for space and water heating.
- climate emergency and net-zero carbon aspirations, while simultaneously delivering distributed local energy, reduced fuel poverty, improved local energy security and rural resilience;
- the Clean Air Strategy through the reduction of ammonia emissions from livestock farming;
- sustainable and regenerative low carbon farming and a circular economy model for agriculture;
- rural economic development through creating farming and local energy sector related jobs that improve rural livelihoods.

Given these benefits, not supporting local small-scale sourcing, processing/upgrading and storage of AD derived biogas for distribution in compressed biomethane gas or liquid biomethane fuel form, to be used in off-gas-grid affordable heat energy provision, through the Green Gas Support Scheme, would be a significant missed opportunity.

If you want to attach further evidence to support your response, please use this file upload function.

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Technologies and uses not supported through this policy

38 Do you agree with not supporting process heating under the Clean Heat Grant?

Not Answered

Please provide evidence to support your response:

39 Do you agree with not supporting biogas combustion under the new policies?

No

Please provide evidence to support your response, including any wider detail on decarbonisation opportunities for biogas combustion in rural areas:
The consultation document articulates clearly the substantial challenge associated with decarbonising heat in off-gas-grid rural locations, a challenge that is particularly acute in areas suffering power grid infrastructure deficits leading to capacity and connectivity constraints. In such settings the use of electrically powered heat pumps is in many cases either not possible technically, potentially exacerbates rural fuel poverty issues (particularly in the case of Air-Sourced Heat Pumps, ASHP, which can be relatively expensive to run), or undesirable/difficult from the perspectives of households or owners/occupiers of business premises. The latter perspectives can relate to a lack of physical space for installation, the historic/listed nature of the building, high heat losses that cannot be bought down cost-effectively, or aesthetic considerations associated with landscapes or architecture. Although biomass might provide an alternative source of heat for space and water heating in a limited number of these "hard to treat" cases, there are air quality and sustainability concerns in its use, as noted in the consultation document. The combustion of biogas delivered as biomethane in compressed gas or liquid form to produce heat for use in space and/or water heating offers a viable alternative option that, if produced from locally sourced organic waste materials such as farm manure or cut grass, is zero-carbon (or better

than zero-carbon), affordable and increases the energy security and resilience of rural communities (see our answer to question 19).

Across the UK rural communities have within them a considerable untapped resource of energy in the form of the biogas that can be derived from farm manures and/or the grass cuttings that result from a wide range of existing rural grassland management operations (for example, maintenance of roadside verges, community playing fields and sports fields, golf courses, country hotels etc). In many cases these sources of energy are relatively small, being at the farm or village/community scale, but when sourced, processed to produce biomethane, and used on-site or aggregated and distributed locally to meet local rural demand, they represent a considerable opportunity for decarbonisation. The challenge is, however, how to access this unused zero-carbon source of energy when the rural production site is small-scale, is not served by a biomethane injection point to the gas grid, and in many cases suffers power grid connectivity constraints preventing its production and/or export as electricity. To meet this challenge, Bennamann Ltd have been developing technical solutions and business models that enable commercially viable utilisation of these local rural energy resources, in the form of compressed biomethane gas and liquid fuel, for the affordable decarbonisation of space and water heating in homes and buildings (ie farms, community halls, schools, businesses etc). Supporting the combustion of biogas through the Clean Heat Grant Scheme would help incentivise the growth of low carbon heat supply chains for these building-level technologies, as well as the production, on-site use, and local distribution of locally sourced biogas in the UK's rural off-gas-grid and power grid constrained communities, ahead of the future phase-out of high carbon fossil fuel heating.

The commercial roll-out of rural off-grid heat provision based on a local supply of biogas, sourced from cut grass or manure slurry AD and processed in small-scale upgrading plants, is scalable and viable in the UK. For example, there are circa 600 dairy farmers alone in the rural county of Cornwall (131,000 dairy cattle – 6% of the national herd), many of whom are off-gas grid and subject to power grid constraints. Of these, there are an estimated 120 farmers in a position to participate in the short-term, including the 58 dairy farms in Cornwall Council's own Farm Estate. Indeed, in the case of the latter, the Council has already committed in principle to a pilot installation of Bennamann Ltd's farm-scale biogas sourcing, processing and distribution technology on 6 of the dairy farms in their Estate which, if successful, is intended to lead to a wider roll-out across the county. Beyond the use of the biogas for space and water heating on the farm sites themselves, the current estimate for off-gas-grid properties (domestic and non-domestic) in Cornwall is 54% (166,487 properties), the majority of which are in rural settings with limited, or no, economically and technically viable low carbon options for heat provision. Typically, solutions proposed for such properties start with technologies for the electrification of heat provision, such as heat pumps and hybrid heat pumps, but these can exacerbate rural fuel poverty issues and are challenging to deliver across an area with significant power grid constraints and limited capacity. Other options are extremely limited and include biomass boilers but, as recognised by the UK Government, there are air quality and sustainability concerns associated with this solution. This situation is mirrored across rural UK and in this regard, as stated in the Consultation document, the Government's own modelling work suggests that, for the domestic sector alone, around 20% of off gas grid fossil fuel homes are not currently suitable for low temperature heat pumps and are better suited to high temperature heating, such as high temperature heat pumps, biomass or combustion of biogas.

In terms of scalability across the UK, there are circa 2,000 dairy farms in the South-West and around 29,000 holdings in the UK have <150 cattle, which constitutes 71% of the cattle farms in the UK (GOV.UK, 2015). With current farming practices, current AD costs and current level of low-carbon energy incentives, a model developed by Mistry (2012), shows that only 3.5% of UK dairy livestock would be linked to economically viable on-farm plants (currently there are only 45 small scale ADs in the UK, ABDA, 2015). Alternatively, Bennamann's farm-scale biogas sourcing (AD), processing, storage and distribution technology would enable 71% of UK dairy farms to become economically viable local zero-carbon energy producers. This would potentially result in a carbon emissions saving of circa 155,000 tonnes CO2 annually for the UK, just from the mitigation of the manure slurry (fugitive) emissions, before accounting for the emissions savings that will accrue through the use of the derived biomethane for decarbonisation of off-grid heat energy provision.

Incentivising a scalable roll-out, would not only significantly help decarbonise off-gas-grid rural heating, reduce fuel poverty, increase rural energy security and build the resilience of rural communities, but also enable dairy farm businesses to generate an additional revenue stream that would provide them with income diversity and increased profitability. As volatile global milk prices continue to undermine confidence and dairy farmers ability to invest, this technology will offer a lifeline to small and medium size farms across the UK. In addition, incentivising biogas production at the farm-scale for local distribution and use in heat provision would help improve the overall sustainability of farming through on-farm use of some of the resulting zero-carbon energy, as well as improved nutrient cycling and soil biology practices by use of the digestate as a replacement for artificial fertiliser (see our answer to question 12).). The digestate can also be applied to the land using Bennamann's proprietary processes and methods (see our answers to question 12 and 13) which support regenerative agriculture and substantially reduce the release of ammonia, thereby mitigating air quality degradation. As a result, farm businesses will be able to become more sustainable in both an economic and environmental sense, with the social benefit of maintaining the viability of rural farming communities, and help deliver a circular economy model for agriculture.

The successful incentivisation of biogas combustion (in parallel with heat pumps) through the Clean Heat Grant Scheme will help UK Government to realise:
- an attractive non-electric affordable zero-carbon heat option which is particularly beneficial for decarbonising off-gas-grid locations where building owners/occupiers resort to bottled gas (e.g propane) or oil for heating and/or power grid capacity and constraints are an issue in meeting electrical demand;
- decarbonisation of difficulty to tackle sectors, including heat and agriculture, in the quest to achieve zero-carbon by 2050 and meet the nation's Paris Agreement commitments;
- the uptake of zero carbon heat to deliver the heat component of the Clean Growth Strategy, which commits to the phase out of the installation of high carbon fossil fuel heating in buildings off the gas grid in the 2020s;
- commercial deployment of technologies consistent with the UK's national 'Industrial Strategy', the findings and recommendations of 'Smart Specialisation in England", the UK Government's 'Eight Great Technologies' and which support the Low Carbon Innovation Coordination Group strategic framework.
- the UK Renewable Energy Roadmap, which extensively considers the need for the supply and utilisation of renewable heat, by researching and innovating a new approach to the provision of off-grid bioheat for space and water heating.
- climate emergency and net-zero carbon aspirations, while simultaneously delivering distributed local energy, reduced fuel poverty, improved local energy security and rural resilience;
- the Clean Air Strategy through the reduction of ammonia emissions from livestock farming;
- sustainable and regenerative low carbon farming and a circular economy model for agriculture;
- rural economic development through creating farming and local energy sector related jobs that improve rural livelihoods.

Given these benefits, not supporting combustion of biogas would be a significant missed opportunity.

40 Do you agree with not supporting solar thermal systems under the Clean Heat Grant?

Not Answered

Please provide evidence to support your response:

41 Do you agree with not supporting hybrid systems under the Clean Heat Grant?

Not Answered

Please provide evidence to support your response:

If you want to attach further evidence to support your response, please use this file upload function.

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Geographical Area

Does your interest in this consultation relate to a particular geographical area? (select all that apply)

England, Wales, Scotland