



**COMITÉ
SCHONE
LUCHT**

Also on behalf of the undersigned, see list, Annex I | April 19, 2024

To: **Informants Mr. E. Dijkgraaf and Mr. R. van Zwol**

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Subject: Appointment on Implementation of the EU 'Renewable Energy Directive' (RED3)
in national legislation regarding Biomass, Climate and Energy Policy

Amsterdam, April 19, 2024

Dear Mr Dijkgraaf and Van Zwol,

During these weeks you will be conducting discussions with various parties based on their recommendations regarding climate and energy policy. An important part of this concerns the implementation policy yet to be developed with regard to biomass combustion for energy. Important because woody biomass still makes the largest contribution to the renewable energy mix: 40 percent in the Netherlands and almost 60 percent in Europe, including biofuels. Since 2018, the Clean Air Committee[1] has been promoting explicit, critical voices (see Appendix 2) from society, nature and forest protection organizations[2] and a large group of scientists in the Netherlands and abroad.[3] A discussion about this subject should therefore not be missed during this formation process.

The current Minister for Climate and Energy Rob Jetten, partly in collaboration with the Clean Air Committee, has initiated the implementation process of the RED3 in national legislation and regulations for the coming years. The incoming government will further implement this.

We will see what happens after the European elections on June 9, how long burning of woody biomass will be considered carbon neutral in the EU. But it is up to the newly formed Dutch government to take a position on this now. The European renewable energy directive provides a basis for this. However, the implementation of this lies in the hands of the member states themselves, which have been explicitly granted space (within the RED3) to follow their own and more far-reaching course.

Against this background, the Clean Air Committee recommends formulating and ensuring clear requirements and guidelines for a truly emission-free and clean energy transition and production. This course also concerns socio-economic criteria, including employment, limiting ecological risks and requirements for clean air and the living environment.

The new government must take control, also in this crucial biomass dossier. The global availability of sustainable bio-raw materials is limited. It is now in your hands to determine the strategy for application in the Netherlands, establish the framework and take control.

In the context of the current formation discussions, we would like to offer you a manual for implementation including necessary and alternative choices, and we would be happy to enter into discussions with you on behalf of the associated signatories.

We would like to receive your confirmation of receipt and look forward to your invitation for a meeting, preferably before May 5.



Also on behalf of the undersigned, see list, Annex I | April 19, 2024

Yours faithfully,

Dr. F. Swart

Chair of the Clean Air Committee | E. Fenna@ComiteSchoneLucht.nl | T. 06 415 14 330

Enclosed three appendices:

I. List of co-signatories; II. Brief overview of biomass file: III. Footnotes

Appendix I:
List of co-signatories

NR	Names (Organization scientist person)	Website (<i>emailadressen afgeschermd</i>)	Nationality
1	AbibiNsroma Foundation	https://www.abibinsromafoundation.org/	Africa
2	van Andel M.	http://maarten-vanandel.com/	Nederland
3	Armstrong N.		Nederland
4	Arnhems Peil	www.arhemspeil.nl	Nederland
5	Arnhemse Bomenbond	www.treeunion.nl	Nederland
6	Aykroyd T.	www.wildeurope.org	Europa
7	Bancroft B.	www.naturens.ca	Canada
8	Bakker S.	https://groenweert.nl/	Nederland
9	Berkhout J. Prof.Dr.Ir.	-	Nederland
10	Biofuelwatch	www.biofuelwatch.org.uk	Engeland
11	Biomass Action Network of EPN International	https://environmentalpaper.org/biomass/	Mondiaal
12	Blokland A.A.		Nederland
13	Boellaard-Hendriks D.		Nederland
14	Bolt M.		Nederland
15	Bomen Brigade Boxtel	www.transitieboxtel.nl	Nederland
16	Bomenkap Meldpunt	www.bomenkapmeldpunt.nl	Nederland
17	Bomenstichting Achterhoek	https://bomenachterhoek.blogspot.com/	Nederland
18	Bos C.F.A. Dr.		Nederland
19	Bouman H.		Nederland
20	Bovy A.J. Dr.Ir		Nederland
21	Briggeman T.	https://knnv.nl/	Nederland
22	Bulens J.D.		Nederland
23	Burnelius, L	https://skyddaskogen.se/?lang=en	Sweden
24	Burger AA C. Mr		Nederland
25	Climate Cleanup	https://climatecleanup.org/	Nederland

26	Comité Matiging Kapbeleid Slangenburg		Nederland
27	Declerck S. Dr.	https://nioo.knaw.nl/nl/employees/steven-declerck	Nederland
28	Dogwood Alliance	https://dogwoodalliance.org/	Amerika
29	EASAC	https://easac.eu/	Europa
30	EDSP ECO	https://edsp.nl/eco/	Nederland
31	Ei polteta tulevaisuutta	https://eipoltetatulevaisuutta.fi/	Finland
32	Feijen E.		Nederland
33	Federatie tegen Biomassacentrales	www.the-fab.org	Nederland
34	Frankfurter G.		Nederland
35	Jac. Gazenbeekstichting	www.de-veluenaar.nl	Nederland
36	Goemans H.		Nederland
37	Goudriaan J. Prof.Dr.Ir.	https://www.wur.nl/	Nederland
38	Graaff, van de W.J.E.		Nederland
39	Great Lakes and Wetlands Association	www.nagytavak.hu	Hongarije
40	Green Impact	www.greenimpact.it	Italië
41	Groot, de P.		Nederland
42	Gutierrez M.	www.earthethics.us	Amerika
43	FERN	www.fern.org	Europa
44	Hamersma S.		Nederland
45	Harinck E. Mr.	SchoonSchip HW	Nederland
46	Hasselt, van N.J.M.M.		Nederland
47	Hennekens S.	https://www.wur.nl/	Nederland
48	Hengeveld E.	www.nioo.knaw.nl	Nederland
49	Hombroek H.		Nederland
50	Hoorstra T. Ir		Nederland
51	Horstink J. Drs.		Nederland
52	Stichting HoutrookVrij	www.houtrookvrij.nl	Nederland
53	Werkgroep Houtstook-vrij		Nederland
54	Hummelen K.	https://www.rug.nl/	Nederland

55	Janssen L.J.M.	https://groenweert.nl/	Nederland
56	Katan M. Prof.Dr.	www.mkatan.nl	Nederland
57	Keller W.J. Prof.Dr.Ir.	https://nl.wikipedia.org/wiki/Wouter_Keller	Nederland
58	Kool B.	www.geenbmcwaddinxveen.nl	Nederland
59	Krio E.		Nederland
60	Krom, de P.	Milieudefensie Leiden	Nederland
61	Kusters P.		Nederland
62	Kenniscentrum Houtrookoverlast	Martin van Raay	Nederland
63	De Klimaatcoalitie	www.klimaatcoalitie.org	Nederland
64	Labohm H.	https://www.climategate.nl/	Nederland
65	Lakerveld K.		Nederland
66	Landelijk Netwerk Bossen- en Bomenbescherming	https://bos-en-bomenbescherming.nl/	Nederland
67	Leefmilieu	www.leefmilieu.nl	Nederland
68	Lentink Eureka&Advies		Nederland
69	The Lifescape Project	www.lifescapeproject.org	Engeland
70	Meurs K.		Nederland
71	Milieudefensie Groningen		Nederland
72	Natuur & Milieu	www.natuurenmilieu.nl	Nederland
73	Natural Resources Defense Council (NRDC)	www.nrdc.org	Amerika
	Stichting Natuur en Milieu Aalten		Nederland
75	Stichting Natuurlijk IJburg	www.natuurlijkijburg.nl	Nederland
76	NOAH, Bente Hessellund	www.noah.dk	Nederland
77	Oldenkamp L.	https://bos-en-bomenbescherming.nl/	Nederland
78	Pasman J.F.		Nederland
79	Pauwels L.L.M.		Nederland
80	Partnership for Policy Integrity (PFPI)	www.pfpi.net	Amerika
81	Pieterse M.J.M. Ir.		Nederland
82	Plas, van der F. Dr,	https://www.wur.nl/	Nederland

83	Ploeg A.		Nederland
84	Prins E.		Nederland
85	Projectbureau Energie Duurzaam	www.energie duurzaam.nl	Nederland
86	Raan, van L.	www.linkedin.com/lammertvanraan	Nederland
87	ROBIN WOOD e.V.	www.robinwood.de	Nederland
88	Rooyackers J.		Nederland
89	Ross G.	https://nioo.knaw.nl/nl/employees/giles-m-ross	Nederland
90	Sairinen V.	https://eipoltetatulevaisuutta.fi/	Finland
91	van Santen R.A. Prof. dr		Nederland
92	Stichting ter behoud van het Schoorlse- en Noord- Kennemerduingebied	www.Duinstichting.nl	Nederland
93	Save Estonia's Forests	www.savetheforest.ee	Estland
94	Save the Forests Sweden	https://skyddaskogen.se/?lang=en	Zweden
95	Scheibler, von W. Ir. Drs	www.natuurlijkplatform.nl	Nederland
96	Schram D.C. Prof. Dr.	www.tue.nl	Nederland
97	Sikkema D.J. Prof. Dr.	https://www.mxpolymer.com/	Nederland
98	Sikkema F. Dr.		Nederland
99	Southern Environmental Law Center	https://www.southernenvironment.org/	Amerika
100	Spoelstra K. Dr.	https://nioo.knaw.nl/nl/employees/kamiel-spoelstra	Nederland
101	Spronsen, van E.		Nederland
102	Swart D. Ir.		Nederland
103	Tropism Art & Science Foundation	https://www.tropism.eu/trees.html	Nederland
104	Tuenter R.		Nederland
105	Vereniging Open Landschap Rijen		Nederland
106	Verschuur H.W.		Nederland
107	Verwer J. Ir.		Nederland
108	Vet L.E.M. Prof.Dr.		Nederland

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109	Villar N. Dr.	https://nioo.knaw.nl/en/employees/nacho-villar	Nederland
110	Vlug J.		Nederland
111	Vodegel M.	https://bos-en-bomenbescherming.nl/	Nederland
112	Vos F.	https://www.daaromduurzaamdiemen.nl/default.aspx	Nederland
113	Vrienden van het Diemerpark	https://vriendenvanhetdiemerpark.nl/	Nederland
114	van der Vuurst de Vries J.J.		Nederland
115	Wakker K.F. Em. Prof. Ir.		Nederland
116	Waldram R.	www.wbv-online.nl	Nederland
117	Wennekes A.	https://groenweert.nl/	Nederland
118	Wild Europe	www.wildeurope.org	Europa
119	Wild Heritage	https://wild-heritage.org/	Amerika
120	Visschers M.	www.leefmilieu.nl	Nederland
121	Weerd, de J.E. Drs.	www.StichtingdeArk.nl	Nederland
122	Wolkers C.		Nederland
123	Wolkers H.	www.wildfrontiers.nl	Nederland
124	Wolkers J.	-	Nederland
125	Wolkers L.	-	Nederland
126	Woudstra Y.		Nederland
127	Yuen, J		Nederland
128	ZERO - Associação Sistema Terrestre Sustentável	www.zero.org	Nederland

Appendix II:

Brief overview Biomass file

The Biomass File - context & background

Towards a future-proof and sustainable economy

The Netherlands wants to become less dependent on foreign countries in terms of energy supply and raw material consumption. The Netherlands also wants to use energy and raw materials more efficiently. Raw materials, high-quality and circular use strengthens our economy. In this way, the Netherlands is building a future-proof economy.

Towards high-quality applications

In the Netherlands, a lot of low-value wood is still used through biomass combustion, despite the recommendation of the SER (2020) to phase out low-value use as quickly as possible and to focus primarily on high-quality applications.[4]

Towards more forests and biodiversity

Extraction of imported wood pellets for combustion in coal-fired power stations, as takes place at RWE (co-firing of biomass), among others, takes place through industrial forestry and clear-cutting.[5] Among others in the Baltic states and the southeast of the United States. This is at the expense of biodiversity and carbon storage.[6]

Towards a feasible and realizable energy transition

Woody biomass produces higher CO₂ equivalent emissions than the fossil fuels it is intended to replace or reduce (even coal). However, alternative renewable energy sources are much more cost-effective. The energy company RWE has plans to completely convert both its Eemshaven and Amer coal-fired power stations from coal to wood with CO₂ capture and storage.[7] This means doubling the current import of wood pellets.[8] The Dutch energy supply will then remain dependent on imports for even longer. [9] The technology in question (called BECCS[10]) is also unproven, very expensive and not CO₂ negative.[11] At the same time, the international biomass market is subject to great uncertainty due to the recent bankruptcy of the world's largest wood pellet producer, the American Enviva.[12]

Towards security for the economy and ecology

Investors from the EU and Asia are currently viewing future investments in the biomass sector with increasing skepticism. Much points to a shortage to permanently qualify woody biomass as sustainable energy. Uncertainty in the business community about both the future policies of the US government and that of Europe regarding the doubling of renewable energy by 2030 (in the RED3), is increasing noticeably. This, in combination with a lack of support in society and science (EASAC, KNAW, JRC, IPCC) regarding the usefulness and necessity of biomass combustion for energy, makes investments in biomass as a renewable energy source extremely uncertain and risky.

Appendix III

Footnotes

[1] <https://comiteschonelucht.nl>

[2] See the undersigned of this letter; Appendix I.

[3] <https://act.wemove.eu/campaigns/biomass>

[4] <https://www.ser.nl/-/media/ser/downloads/adviezen/2020/biomassa-in-balans-persbericht.pdf>
<https://www.ser.nl/nl/Publicaties/advies-biomassa-in-balans>

[5] <https://www.trouw.nl/opinie/omgebouwde-kolencentrale-levert-niet-opeens-groene-energieintegendeel~b04bfc0c/>

[6] <https://comiteschonelucht.nl/campagnes/>

Various foreign forest protection organizations have repeatedly confronted the Dutch government about its policy regarding biomass burning in recent years.

[7] <https://www.bnnvara.nl/joop/artikelen/ondanks-verkiezingsbeloften-is-nederland-nog-steeeds-koploper-bossen-verbranden-onder-de-noemer-biomassa>

[8] <https://www.volkskrant.nl/columns-opinie/opinie-nieuwe-leefomgeving-rapport-dient-vooral-depolitiek-niet-het-klimaat~b549cd3e/>

[9] <https://www.volkskrant.nl/columns-opinie/opinie-nieuwe-leefomgeving-rapport-dient-vooral-depolitiek-niet-het-klimaat~b549cd3e/>

If the Netherlands were to use its own forest to supply wood pellets for the two RWE power stations, the Dutch forest would have been cut down and burned in approximately 5 years.

[10] <https://nl.wikipedia.org/wiki/BECCS>

BECCS stands for bio-energy and carbon capture and storage.

[11] <https://comiteschonelucht.nl/rwe-start-controversieel-vergunningproces-voor-biomassa-met-beccs-amercentrale/>

[12] <https://news.mongabay.com/2023/11/enviva-the-worlds-largest-biomass-energy-company-is-near-collapse/>