

Position Paper Round Table Conversation Biomass, Cie EZK dated 15 June 2023

## The Questionable Role of Biomass in the Energy Transition

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The fact that biomass combustion is less sustainable than originally thought, seems to be widely known by now. But appearances are deceiving. This spring, the energy and forestry sector is urging the Dutch minister to continue subsidizing forest clearing for biomass. This is not without reason. A new marketing offensive is launched, the day after the adoption of Europeans' revised Renewable Energy Directive (RED3)<sup>1</sup> (March 2023). However, this call is at odds with the letter presented to parliament last month by the Dutch Minister, Rob Jetten, about his intended approach to bio-raw materials, including the protection of forests and biodiversity.<sup>2</sup> *What is going on and what role did the Dutch biomass covenant between industry and nature organizations play in the maturation of biomass in the Netherlands?*

Biomass combustion for energy is one of the largest ecological drifts on international and political level. It is based on a misrepresentation of facts. I.e., the premise that forest biomass combustion would be 'climate neutral' and thus contribute to the 'reduction targets'. Everyone knows that the burning of anything contributes to an increase in emissions. Burning forest biomass contributes to an increase in global forest clearing and clear-cutting, loss of biodiversity, further depletion of carbon storage and more CO<sub>2</sub> emissions and other pollution (particulate matter and nitrogen) in the atmosphere. Moreover, it is a very imprudent spending of billions of subsidy money.

### *The biomass covenant*

In 2015, the so called 'Biomass Sustainability Covenant' is signed by five environmental organizations (*Greenpeace, Milieudefensie, Natuur & Milieu, Natuur & Milieufederaties and WWF*) together with the energy sector (*Energie-Nederland, Onyx Power, RWE, Uniper, Vattenfall*) on the use of biomass in power plants.<sup>3</sup> In its own words, the Covenant sets out 'the strictest sustainability criteria in the world'. Nevertheless, it soon becomes apparent that wood pellets, used for biomass combustion and co-firing in Dutch coal-fired power plants, are not produced according to Dutch criteria for sustainable biomass, as shown by research by, among others, SOMO<sup>4</sup>, Biofuelwatch<sup>5</sup> and many other practice-based reports and

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<sup>1</sup> <https://www.dogwoodalliance.org/2023/04/usda-forest-destruction-netherlands/>  
<https://www.bnnvara.nl/joop/artikelen/minister-jetten-moet-de-schaamteloze-biomassa-industrie-beperken-in-plaats-van-stimuleren> ;  
<https://www.dogwoodalliance.org/2023/03/statement-new-eu-biomass-policy-fails-to-protect-southern-forests-and-communities/>

<sup>2</sup> <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/05/12/kamerbrief-stand-van-zaken-implementatie-duurzaamheidscriteria-biogrofstoffen-in-regelgeving>

<sup>3</sup> The southern part of the US is the world's center for the production of biomass from wood pellets. A region where 90% of the forests are privately owned and less than 5% of the area is owned by people of color. The wood pellet industry has grown exponentially over the last 10 years. The vast majority of its factories are built in areas where disadvantaged populations live. Several of these plants have been fined for emitting toxic pollutants in concentrations well above their legal limits. In the period 2019-2027, 3.6 million tons of wood pellets are burned annually in Dutch coal-fired power stations with a total of 3.5 billion euros in incentive subsidy. Every time a new plant for exporting wood pellet biomass on an industrial scale opens, a new community in the South suffers the consequences. These communities are almost predominantly black, have below-average incomes and lack the resources to combat a heavily polluting industry. Nevertheless, the US Department of USDA, actively assisted by the Dutch Ministry of Economic Affairs and Agriculture, continues to actively promote biomass from wood pellets as a climate-friendly energy source for overseas markets such as the Netherlands (together with UK and Denmark in the top 3) and the expansion of this industry in this area. stimulating way. Until at least 2027, 3.6 million wood pellets (the majority of which now come from the US) will be burned annually in Dutch coal-fired power plants on the basis of a 3.5 billion euro incentive subsidy. See further:  
<https://www.nrc.nl/nieuws/2023/04/02/biomassa-niet-duurzaam-toch-subsidies-a4161072>

<sup>4</sup> This covenant was a result of a compromise reached in 2013 in the SER Energy Agreement between companies, government and environmental organizations about the energy transition. Environmental organizations insisted on a rapid closure of coal-fired power stations, massive deployment of offshore wind turbines and more solar panels. In exchange for this, the use of biomass was accepted on the condition that it would be produced sustainably.

<sup>5</sup> <https://www.somo.nl/wood-pellet-damage/>

evaluations.<sup>6</sup> For this reason, in July 2021<sup>7</sup>, the nature organizations decide to leave the covenant. An important step and one of the main reasons why we are here today. This decision to exit causes great indignation from the forestry and energy industry. Not surprising if you follow the economics. Leaving biomass as a sustainable option has a major impact on industrial profits and investments in 'renewable' energy. SDEhas proven to be an significant financial backing system. Industrial wood combustion for energy (biomass), accounting for an annual share of 60 percent 'renewable energy', is boosted from Brussels with more than 17 billion euros in subsidies per year.

#### *International protest from science and society*

Nevertheless, the choice to withdraw from the covenant is mainly symbolic in nature. Direct consequences are not imminent. Investments have already been made for the long term. On the basis of the covenant, during the first crucial years 2015-2021, biomass can grow indefinitely into a well-oiled machine in which systematic forest clearing, clear-cutting and the import of wood pellets is scaled up to unprecedented proportions. Large nature organizations are tied with their hands and silenced because of their commitment to the covenant. An ecological disaster on a global level is the result. Small Dutch nature NGOs, such as the Clean Air Committee<sup>8</sup>, Leefmilieu and MOB, step into this vacuum and manage to organize themselves in a period of six months at local, regional and (inter)national level. As a result, an international coalition of nature NGOs against biomass is created, which under the leadership of the Clean Air Committee, Birdlife Europe, WeMove EU and Forest Defenders Alliance, urgently call on the Dutch Minister, Rob Jetten, Minister of Climate, to immediately stop biomass subsidies. Not only because of the great damage to natural forests and biodiversity in the Baltic countries, but also in Romania, Poland, the US and Canada. The call is signed by more than a quarter of a million Dutch and Europeans. Partly on the basis of this international call, the minister decides to stop new biomass subsidies with immediate effect.<sup>9</sup> With the Dutch subsidy stop, critical attention to the revision of the EU directive (RED) is gaining momentum internationally. Yet here too, the step appears to be largely of symbolic value. The majority of the SDE subsidies are included in the existing subsidies. And they continue. This will continue the large-scale import of wood pellets.

#### *IPCC: 'renewability definition' biomass problematic*

Although the biomass covenant largely contributes to the significant growth of biomass in the Netherlands (NL is next to Denmark and the UK in the top 3 largest biomass importing countries<sup>10</sup>), the biomass debacle has its origins in the UN conference on climate change in 1997. The Kyoto protocol drawn up at that time was intended to reduce emissions. Industrial forest burning was formalized because negotiators at the time still thought that biomass was a small part of energy production or small enough to bring about regrowth of forests. Nonetheless this was not about shipping millions of tons of wood thousands of miles away to burn in other countries. An interesting detail is that even the IPCC, also in 1997, already indicates that wood combustion is 'technically renewable' (trees grow back 50 to 100 years), but is rather difficult to define it as 'truly renewable'. This in contrast to sun and wind.

#### *Carbon debt and a failing certification system*

For industrial wood combustion (biomass) in Europe and beyond, the everyday reality is that forests,

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<sup>6</sup> <https://www.biofuelwatch.org.uk/2023/sbp-rapport/>

<sup>7</sup> <https://www.greenpeace.org/nl/natuur/47038/de-biomassa-leugen/>

<sup>8</sup> <https://comiteschonelucht.nl/about-us/>

<sup>9</sup> <https://comiteschonelucht.nl/persbericht-22-april-2022-breaking-nederlandse-geldkraan-per-onmiddellijk-dicht-voor-biomassa/> ; <https://act.wemove.eu/campaigns/biomass-in-dutch-nl> ; <https://nos.nl/artikel/2426118-stop-op-subsidies-voor-stook-van-biogrondstoffen-voor-warmte> <https://comiteschonelucht.nl/campagnes/>

<sup>10</sup> Together with England and Denmark, the Netherlands is in the top 3 of largest biomass burners

<https://comiteschonelucht.nl/nederland-in-top3-op-internationale-lijst-van-grootste-biomassasubsidieverstrekker/>

including protected Natura2000 nature areas, are destroyed (cut down) in Estonia, Latvia and the US, among others. Entire trees and natural forests, with everything that lives in them, go into the shredder on site and enter the port of Rotterdam as wood pellets.<sup>11</sup> Also centuries-old trees, originating from habitats of protected animals or from rich peat soils. The 'additionally announced sustainability criteria' in both the new EU directive and in the minister's letter to parliament do not change this. Not only because practice shows that the sustainability criteria are unfeasible and unverifiable, but also and above all because they do not contribute in any way to solving the problem, namely the reduction of additional greenhouse gas emissions. When biomass is burned, more CO<sub>2</sub> is emitted per unit of energy produced than when coal or gas is burned. Burning wood produces 16% more CO<sub>2</sub> than coal and 94% more than gas. The often cited soffitism to burn wood for energy, is that a new tree is planted for every felled tree that would remove the released CO<sub>2</sub> from the air. However, the time factor is not taken into account here. Even under the most favorable assumptions, it takes 40 to over 100 years for new plantings to reabsorb the CO<sub>2</sub> released during combustion from the atmosphere (carbon debt). It will take even longer before the extra CO<sub>2</sub>, that an uncut tree would have absorbed, is compensated. Biomass is being promoted as a transition fuel with huge subsidies, while the SER (2020)<sup>12</sup> explicitly stated in 2020 that biomass should be primarily used as a raw material for the chemical industry and biobased materials. In addition, biomass subsidies disrupt the market and the availability of biomass for high-quality use.

#### *The alleged climate neutrality of biomass*

Against this background (ecosystem destruction, disruption of the market for high-quality applications, failing sustainability certification system and increase in emissions), the biomass debate should primarily be about the falsehood of the politically claimed 'climate neutrality', rather than the (tightening of) sustainability certification of forest management. The Dutch Government should therefore no longer earmark the SBP certification<sup>13</sup> as proof of compliance with Dutch SDE+ sustainability criteria. Certification has turned out to be nothing other than greenwashing biomass combustion. For these reasons, the existing, long-term biomass subsidies should be stopped as soon as possible following the new subsidies that were previously discontinued, at the beginning of last year (2022). Biomass combustion is not climate neutral and leads to extensive loss of biodiversity. Finally, in addition to business and energy experts, it is crucial to also involve ecologists in subsequent deliberations who, in collaboration with domestic and foreign NGOs, have independent (practical) knowledge of the impact of biomass combustion in both the EU and the wood pellet industry in the source countries exporting to the EU member states, incl. the Netherlands.

#### *Finally*

Dear Members of Parliament, do not be misled by untruths motivated by political-economic motives. Listen to society (domestic and foreign nature NGOs) and independent (not bio-based) science. They know better what is going on than current stakeholders from the forestry industry and energy sector. A definitive stop on subsidies does not lead to claims. Fear of this, prompted by the industry, is scaremongering and unjustified. The Urgenda verdict has been ignored for 5 years and that of MOB (PAS) for 4 years. An energy company that would like to start a case can join the queue. Don't shy away from battle. Show leadership and pay a ransom if necessary. Cheaper and more sustainable than the many extra

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<sup>11</sup> Twitter link bulk carrier and doc WOOD FEVER: <https://twitter.com/fenokkio/status/1459147634476822532?s=20>

<sup>12</sup> Sociaal-Economische Raad, 2020. SER advice Biomass in balance - a sustainability framework for high-quality use of biobased raw materials (No. 20/07) .

<sup>13</sup> The private SBP (Sustainable Biomass Program) certification of biomass was set up by the business community. NGOs do not support SBP. The business community has a major position of power and conflicts of interest in SBP certification, including when drafting legislation. Regulator NEa falls seriously short (see situation in Estonia). SBP certification does not meet the SDE++ sustainability requirements for biomass combustion, including on the topics: (1) no destruction of carbon sinks; (2) no long-term carbon debt and (3) conservation and enhancement of biodiversity. The Sustainable Forest Management FSC and PEFC certification are also not sufficient.

emissions from burning biomass. Improper political governance (often shielded) exists only in the light of future generations. But a livable earth is more important than an angry (energy) company.

*Also on behalf*

drs. Johan Vollenbroek, chair Mobilization for the Environment

drs. Maarten Visschers, board member of the Environment

In collaboration with the following foreign nature NGOs

Biofuelwatch UK

Birdlife, EU

2Centigrade & Agent Green, Romania

Dogwood Alliance USA

Estonian Fund for Nature, ELF, Estonia

FERN, EU

Forest Defenders, EU

NABU, Germany

NRDC, USA

Noah, Denmark

PFPI, USA

Robin Wood, Germany

Save Estonian Forests, Estonia

Save the Forests, Sweden

Workshop for all Beings, Poland

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**Videos forest and clear felling for wood pellets biomass:**

January 2022. WOODFEVER. Seven Sinns of Biomass. Comite Schone Lucht.

<https://comiteschonelucht.nl/movie/>

16 december 2021 Dutch woodchip-producer Vandenbroek BV, Promotionfilm about how they convert tree trunks into chips for biomassplants. <https://t.co/Rv9ukov73E>

[www.vandenbroekbv.nl/producten/houtchips-productie](http://www.vandenbroekbv.nl/producten/houtchips-productie)

Instituto Politec nicode Tomar(Portugal):Ilusão insustentável (unsustainable illusion). Where the biomass plant in Fundao gets its wood. <https://www.youtube.com/watch?v=Muz2-6BXmmSk> . See tree trunks at 1:16, 2:15, 5:35, 7:40 en 10:30.

6 sept 2020: ARD 1. Europa magazin · Das Erste. Estland: Waldrodungen für die Pelletindustrie. About clearing forests for pellets in Estonia.

30 augustus 2020 Mongabay. Why biomass burning isn't a climate solution:

[https://www.youtube.com/watch?v=7\\_yzrJleyGE](https://www.youtube.com/watch?v=7_yzrJleyGE)

19 juli 2020. French pellet factory shows how they convert huge trees into pellets.

Biosylva 2020-07 Fabrication des granules. pourpoeleapelllets.mp4

4 juni 2020. Fragile Forests–Estonia 2020. English subtitles.

[https://www.youtube.com/watch?v=lzUcHXTC6vo&ab\\_channel=PriiduSaart](https://www.youtube.com/watch?v=lzUcHXTC6vo&ab_channel=PriiduSaart)

22 febr 2020. EenVandaagTV, Tom van 't Einde. To meet our climate goals, the US is 'completely destroying the landscape'.

<https://eenvandaag.avrotros.nl/embed/524402/>

<https://eenvandaag.avrotros.nl/item/om-onze-klimaatdoelen-te-halen-wordt-in-de-vs-het-landschap-volledig-verwoest/>

2019-03. Belgie Ham, houtpelletfabriek Ecopower CVBA: This is how pellets are made in our factory in Ham. [www.youtube.com/watch?v=Fet2zceG9VI&feature=youtu.be](http://www.youtube.com/watch?v=Fet2zceG9VI&feature=youtu.be) of <https://youtu.be/Fet2zceG9VI>

2019. Denmark TV2, In Danish, but clearly showing logging of whole trees.

<https://nyheder.tv2.dk/samfund/2019-09-09-tv-2-afsloerer-fejli-klimakontrol-helt-sort-siger-ekspert>

2019. Dogwood/NRDC Brochure: Global Markets for Biomass Energy are Devastating

U.S. Forests [www.dogwoodalliance.org/wp-content/uploads/2019/07/Biomass-Investigation-Booklet-2019.pdf](http://www.dogwoodalliance.org/wp-content/uploads/2019/07/Biomass-Investigation-Booklet-2019.pdf)

Jan 18, 2018. Platform Wald-Klima.de. The Calculation Error-or: Why Burning Wood is not Carbon Neutral. [www.youtube.com/watch?v=YC4tqu8-oSo](http://www.youtube.com/watch?v=YC4tqu8-oSo)

ZemblaTV 22 mei 2017: Forest as fuel (Bos als brandstof). [www.youtube.com/watch?v=6LHGbiyvZto](http://www.youtube.com/watch?v=6LHGbiyvZto)

2017. LinkTV. Burned: are trees the new coal? About wood pellet production in the US.

<https://burnedthemovie.com/> <https://burnedthemovie.com/streaming-and-screening/>

18 dec 2015 Bio-energy plant Cuijk (NL), 00:50 min:

[www.youtube.com/watch?v=38nw09mDyys&feature=youtu.be&t=53](http://www.youtube.com/watch?v=38nw09mDyys&feature=youtu.be&t=53) (with large piles of logs).

## **Fire letters of scientists and NGOs calling for subsidies to stop biomass combustion**

### *Scientists*

23 januari 2023: <https://folding.bmc.uu.se/outreach/> <https://folding.bmc.uu.se/wp-content/uploads/2023/01/scientist-letter-to-EU-2023-01-23.pdf>

Letter of 550 scientists to President von der Leyen, President Metsola, President Michel.

5 december 2022 (at the start of Montreal Conference Biodiversity): Scientists in calling for an end to industrial-scale forest biomass. About 650 scientists, including several dozen Dutch scientists.

<https://www.cutcarbonnotforests.org/scientist-letter-read/>

<https://www.theguardian.com/environment/2022/dec/05/stop-burning-trees-scientists-world-leaders-cop15-age-of-extinction-aoe>

February 2021: <https://www.woodwellclimate.org/letter-regarding-use-of-forests-for-bioenergy/> Hundreds of scientists affirm that trees are more valuable alive than dead. Both for climate and for biodiversity.

January 2018: [https://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800- signatures\\_Scientist-Letter-on-EU-ForestBiomass.pdf](https://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800- signatures_Scientist-Letter-on-EU-ForestBiomass.pdf) Letter from 800+ scientists to EU parliament about effects of biomass combustion.

*NGO's*

20 mei 2020. Comité Schone Lucht et al., Fire letter to SER

<https://www.foodlog.nl/artikel/brandbrief-aan-ser-stop-de-sde-subsidie-op-biomassa-en-laat-isoleren/>

3 nov. 2020. Comité Schone Lucht et al., Fire letter to Eric Wiebes minister Climate.

<https://www.foodlog.nl/artikel/brandbrief-ezk/>

26 april. 2021. Comité Schone Lucht et al., Third fire letter on subsidies on biomass combustion, to informateur of new Dutch government, Tjeenk Willink <https://www.foodlog.nl/artikel/derde-brandbrief-subsidiestop-biomassaverbranding-ditmaal-aan-informateur-t>