



ESTONIAN FUND FOR NATURE



Letter from International NGOs to the Danish Parliament and Climate Minister Regarding Forest Biomass

To Members of the Danish Parliament and the Minister of Climate, Energy, and Supply, Dan Jørgensen,

As the Danish government commendably sets a new political direction based on the priority of responding to the climate crisis, we strongly urge members of Parliament to address the present use of wood-based bioenergy (referred to as “biomass”) as an energy source in Denmark in order to avoid extensive harm to the world’s forests and the acceleration of climate change. Representing millions of activists in the United States, Estonia, Lithuania, the U.K., and Germany, we are urging the Danish government to impose a levy on biomass, to phase out the subsidy for burning biomass from wood, and to determine a date for phasing out biomass as soon as possible.

According to the most recent estimates taken in 2017, Denmark’s renewable energy supply was predominantly met by biomass (nearly 70%¹). In the European Union, no country spends more

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<https://www.danskindustri.dk/globalassets/dokumenter-analyser-publikationer-mv/brancher-og-foreninger/di-branchefallesskaber/di-energi/publikationer/bioklyngeanalyse-2017.pdf>

per capita in bioenergy subsidies than Denmark.² Furthermore, Denmark's CO2 emissions are growing significantly when biomass combustion is included, emitting nearly 30% more carbon than it is required to report.³ Finally, the recent TV2 investigation series made it apparent that voluntary sustainability standards agreed upon by the biomass industry are falling short of genuinely protecting forests, climate, and communities. There is historical precedent set by countless media outlets and NGO investigations that affirm TV2's findings, dating back year-after-year to 2014.⁴

As over 800 scientists warned the European Union last year, "even if forests are allowed to regrow, using wood deliberately harvested for burning will increase carbon in the atmosphere and warming for decades to centuries – as many studies have shown^{5, 6} – even when wood replaces fossil fuels such as coal, oil, or natural gas."⁷ Burning wood is inefficient and emits far more carbon than burning fossil fuels for each kilowatt hour of electricity produced.⁸ While the European Commission, and Denmark, do not count emissions from power plants that burn wood, this is based off an outdated inventory paper from the International Panel on Climate Change dating back to 1990.⁹ More recently, countless opinions from the world's leading scientists have detailed "serious errors" in said greenhouse gas accounting of biomass.^{10,11,12,13} Governmental bodies such as North Carolina's Department of Environmental Quality, a state in the U.S. where Denmark imports biomass from, have even said that "the large scale use of North Carolina's natural resource to meet foreign markets' carbon reduction goals by taking advantage of current accounting of methodology should be challenged."¹⁴ Carbon neutrality assumptions around biomass are not made in reference to meaningful timeframes to address climate change: most critically, forests cut down to provide wood pellets for power immediately release large quantities of carbon dioxide, and decades of tree regrowth are required to reabsorb released CO2.¹⁵ While emissions from plants burning biomass are going completely uncounted in emissions accounting ledgers, the atmosphere is experiencing increased amounts of carbon: meaning permanent damage due to more rapid melting of glaciers, thawing of permafrost, and more packing of heat and acidity into the world's oceans.¹⁶

² Available in a report by NRDC, and in correspondence with Trinomics, soon to be released: "Burnout: EU Clean Energy Policies Lead to Forest Destruction"

³ According to experts at Forests of the World

⁴ https://www.nrdc.org/sites/default/files/media-uploads/9965_nrdc_2019_booklet_05_em_-_web_version.pdf

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https://easac.eu/fileadmin/PDF_s/reports_statements/Carbon_Neutrality/EASAC_commentary_on_Carbon_Neutrality_15_June_2018.pdf

⁶ <https://onlinelibrary.wiley.com/doi/10.1111/gcbb.12643>

⁷ http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf

⁸ <https://onlinelibrary.wiley.com/doi/full/10.1111/gcbb.12327>

⁹ <https://www.ipcc.ch/report/climate-change-the-ipcc-1990-and-1992-assessments/>

¹⁰ http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf

¹¹ <https://iopscience.iop.org/article/10.1088/1748-9326/aaac88>

¹² <https://www.eubioenergy.com/2015/11/20/bioenergy-is-not-carbon-neutral-says-ipcc-author-william-moomaw/>

¹³ <https://www.chathamhouse.org/sites/default/files/publications/research/2017-02-23-woody-biomass-global-climate-brack-final2.pdf>

¹⁴ https://files.nc.gov/governor/documents/files/NC_Clean_Energy_Plan_OCT_2019_.pdf

¹⁵ <https://doi.org/10.1016/j.rser.2013.02.045>

¹⁶ <https://doi.org/10.1126/science.aat2305>

Looking specifically at Ørsted's supply chain from the Southern U.S. and Estonia, TV2's recent biomass investigation exposed highly destructive harvesting practices, affirming several years of documentation by other journalists and NGOs year after year in Ørsted's supply chain, including clearcuts of bottomland hardwood forests, lack of replanting, where replanting occurs, a conversion to monoculture plantation forests that absorb 50% less carbon than natural forests, and the clear picture that industry's term of "waste wood" actually means mature trees from natural forests.^{17,18,19} These documented instances of unsustainable biomass sourcing took place under the industry's voluntary sustainability standards and should result in revocation of biomass subsidies, stringent regulation and legislative phase-out of biomass, as well as a levy on biomass.

The practices documented by TV2 are not isolated incidents. In the Southern U.S., the world's largest pellet producing region, nearly 90% of forests are privately owned, meaning little to no regulations whatsoever impact forestry practices and large-scale unsustainable practices are carried out routinely. Clearcutting of highly-biodiverse bottomland-hardwood forests is commonplace, as is the subsequent conversion of those forests to monoculture tree plantations. Enviva, a supplier to Ørsted, admits that the majority of the wood it uses for pellets is hardwood. In that region, hardwood is predominantly found in natural forests, not in plantations.²⁰ In Estonia, forestry regulations are weak and poorly enforced. For example, clearcutting of Natura 2000 sites has been authorised by the state, as have been logging operations during the nesting seasons of birds.

Subsidizing biomass as renewable energy, in the same way as genuinely non-emissive technologies, such as solar and wind, is grossly counter productive considering burning forests as fuel for electricity generation emits large quantities of CO₂, and it is scientifically indefensible to assume otherwise.

Continued reliance on biomass power syphons scarce resources (taxpayer subsidies and broader investments) from genuinely zero-carbon energy solutions, such as solar, onshore wind, offshore wind, and geothermal, as well as batteries and demand-side response innovations. It is these technologies, not coal and other fossil fuels, which are the correct point of comparison for determining whether biomass has any role left to play in decarbonizing Denmark's power sector.

We are encouraged by the new government's direct statements that express desire to speed up the phasing out of imported biomass. We call on you to set a date for the phase-out as quickly as possible, to impose a levy on biomass, and to phase out the subsidy for burning biomass from wood. Our organizations are interested in exploring what meaningful legislation in Denmark could look like to make this happen and welcome the opportunity to meet to discuss

¹⁷ <https://nyheder.tv2.dk/samfund/2019-09-09-tv-2-afsloerer-fejl-i-klimakontrol-helt-sort-siger-ekspert>

¹⁸ <https://nyheder.tv2.dk/samfund/2019-09-11-anklage-danske-kraftvaerker-braender-trae-som-kunne-have-tjent-andre-formaal>

¹⁹ <https://nyheder.tv2.dk/2019-09-09-naar-danmark-braender-traeer-af-bliver-der-ikke-altid-plantet-nye>

²⁰ <http://www.envivabiomass.com/sustainability/track-and-trace/>

these issues further following the Government's completion of the new and ambitious climate change legislation.

Yours sincerely,

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