

January 21, 2020

To: Prof.dr.ir. J.T.H. Mommaas  
CC: Pieter Boot, Sectorhoofd Klimaat  
Bart Strengers, Project Coordinator Joint Fact Finding Biomass  
Alexander van der Vooren, Secretary of the SER Working Group on a Biomass Framework  
Jan-Paul van Soest  
Re: Joint Fact-Finding Availability and Application Sustainable Biomass

Dear Prof.dr.ir. J.T. H. Mommaas,

We are writing to you on behalf of environmental NGOs in the USA and Estonia, i.e. two of the countries from which the Netherlands is importing wood pellets burned in Dutch power stations. Many of those pellets rely on logging our countries' biodiverse forests. Dutch biomass demand and the policies driving it are therefore of major concern to our organisations and to others who care about the forests of the southeastern USA and the Baltic States, as well as to communities affected by logging and pellet production in our countries.

We are aware that the draft report of the PBL Inquiry into biomass sustainability will shortly be published. Given the importance of the subject of the report for our countries and our work, ***we ask you to ensure that the draft report will be made available in English as well as Dutch.***

We also wish to express our serious concerns about the fact that non-peer reviewed evidence is being excluded from the scope of the PBL inquiry and report. By comparison, the [Intergovernmental Panel on Climate Change](#) takes account of "selected non-peer reviewed literature" for its reports. We believe that the exclusion of literature, reports, and environmental assessments carried out by NGOs and community groups regarding the practice of extracting wood for biomass undermines the credibility of the inquiry and report. Peer-review is an important tool for maintaining good standards in scientific research and its reporting. Peer-reviewed science is clearly vital for assessing, for example, the carbon debt and other climate impacts of wood-based bioenergy. However, establishing the origin of the wood burned in Dutch power stations, the logging methods used, and the direct impact this logging has on forests from which pellet wood is sourced are not matters for scientific inquiry and debate. They require a credible approach to fact-finding. Literature and reports on the quality of enforcement and supervision of the enforcement published by NGOs lend exposure of how weak accreditation in the wood pellet industry is. Non-peer reviewed evidence from credible media outlets and industry-watchdogs has exposed the controversy of biomass sourcing for years.

By rejecting non-peer reviewed evidence entirely, the PBL Inquiry risks rejecting all evidence as to how and where wood pellets are actually sourced. We fear that this will mean that peer-reviewed economic modelling studies of *hypothetical* wood pellet sourcing will be taken into account, but that all of the well-documented evidence from numerous sources about *actual* wood pellet sourcing will be ignored.

***We hope that your inquiry will re-consider this approach and allow non-peer reviewed factual evidence about wood sourcing for Dutch biomass energy and its impacts to be allowed and fully reflected in the final report.***

We look forward to your reply.  
Best regards,

**US-based NGOs**

Dogwood Alliance  
Natural Resources Defense Council  
Southern Environmental Law Center  
Partnership for Policy Integrity  
Rachel Carson Council  
Global Forest Coalition  
Center for Biological Diversity  
John Muir Project  
MountainTrue  
Coastal Carolina Riverwatch  
Crystal Coast Waterkeeper  
White Oak-New Riverkeeper Alliance  
Toxic Free North Carolina  
North Carolina WARN  
Southwings

**Estonia-based NGOs**

Estonian Fund for Nature  
Forest AID Estonia  
Estwatch

**Other international NGOs**

Fern  
Nova Scotia Healthy Forest Coalition  
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