



September 2020

Hiroshi Kajiyama, Minister of Economy, Trade and Industry (METI)

Koji Hongo, Deputy Director-General of Forestry Agency

Biomass Sustainability Working Group members

Dear Mr. Kajiyama, Mr. Hongo, and Biomass Sustainability Working group members,

We, organizations based in the United States, a sourcing region for the emerging wood pellet biomass market of Japan, are calling on the Japanese government to exclude forest-based wood pellet biomass from the *Act on Special Measures Concerning Procurement of Electricity from Renewable Energy By Electricity Utilities*, and thereby stop direct and indirect subsidies for renewable energy from burning forests as fuel. By living in the region that is the world's largest producer of wood pellets, we have seen how wood pellet biomass is an egregious greenwash of "renewable energy" and that its production and consumption has adverse impacts on climate, forests, and communities.

The Southern U.S. is a primary sourcing region for Enviva Partners LP, who is increasingly supplying Japanese companies including Sumitomo Corporation with large quantities of wood pellet biomass due to the incentive provided by the feed-in-tariff. Dogwood Alliance's on-the-ground investigations depict a consistent story of the wood pellet biomass industry sourcing from natural forests. Numerous field investigations have tied Enviva pellet manufacturing to the use of whole trees and

logging of natural forests.¹ These indicate that Enviva is incapable of acting responsibly in the landscape in which it operates; and their guarantees of sustainability are greenwashing at its best.

Enviva operates many of its plants in the state of North Carolina. The NC state government recently said in its own Clean Energy Plan that the large-scale use of North Carolina's forests in foreign markets should be "challenged at the national and international level." The official document explicitly recognized that the wood pellet industry increases carbon emissions in the state via logging, processing, and transportation.² These statements from North Carolina indicate a strong belief that domestic bioenergy production *and* consumption is harmful -- and that the state may, in the future, take action to reduce the ability of biomass energy facilities to operate.

There are also serious concerns about the carbon emissions of wood pellet production and consumption. There is an emerging scientific consensus that wood pellet biomass emits too much carbon to effectively mitigate climate change. Therefore, there is a significant risk in using wood pellet biomass to reach renewable energy targets. From a climate perspective, scientists have shown that regardless of the source of wood (e.g., pulp, whole trees), using wood to produce wood pellets results in an increase in carbon in the atmosphere for decades to centuries.³

The wood pellet biomass industry places additional stress on a region that is already heavily exploited for forest products. While the Southern U.S. contains just 2 percent of the world's forest cover, it produces 12 percent of the world's roundwood and 19 percent of its pulp and paper products.⁴ In other words, the wood products industry in the Southern US is more productive than any other forest in the world. Industrial-scale wood pellet biomass production in the Southern U.S. has caused more forests to be logged, because wood pellets are a low quality wood product. Forests that were once unworthy are now profitable to clearcut because of the burgeoning wood pellet industry.

The Southern U.S. is logged at a rate four times that of South American rainforests. To make matters worse, logging for wood pellets creates clearcuts and promotes the removal of much more fiber than traditional logging practices. This extra removal results in additional carbon, ecosystem services, and wildlife impacts.⁵

Led by Enviva, the wood pellet biomass production industry has immediate community-wide impacts on air and water quality, as well as impacts on resilience against climate change impacts like flooding. Research shows that the wood pellet biomass industry releases not only millions of tons of greenhouse gases, but also tons of soot particles that can trigger asthma and heart attacks, as well as carcinogens and smog-forming pollutants.⁶ These impacts are occurring mostly or exclusively in "Environmental Justice" communities -- communities that have a high non-white population and an above-median poverty level.⁷ Community members living within 1-3 km have visible layers of dust coating their property daily.⁸

¹ <https://www.dogwoodalliance.org/2019/10/uncovering-the-truth-investigating-the-destruction-of-precious-forests/>

² North Carolina Clean Energy Plan: Transitioning to a 21st Century Electricity System (2019)
https://files.nc.gov/governor/documents/files/NC_Clean_Energy_Plan_OCT_2019_.pdf

³ Booth MS. Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy. *Environ Res Lett.* 2018;13: 035001. doi:10.1088/1748-9326/aaac88

⁴ <https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=7f8429df087e4c86951a7e69d93207a7>

⁵ <https://www.nature.com/articles/srep15991>

⁶ <https://www.lung.org/assets/documents/advocacy-archive/health-organizations-letter-biomass.pdf>

⁷ <https://www.liebertpub.com/doi/10.1089/env.2017.0025>

⁸ <https://burnedthemovie.com/the-film/>

Southern U.S. forests are a critical climate solution, storing enormous amounts of carbon in their trees and soils and buffering communities from climate impacts like flooding and storms. For years in a row, massive flooding linked to climate change has caused tremendous suffering with estimated economic costs totaling tens of billions of dollars.⁹ These effects are amplified when wood pellet companies like Enviva avoid following Clean Air Act guidelines and rules.¹⁰ Living forests, when left standing, provide optimal storm protection in the form of natural flood control.

If the Japanese government's aim is to reduce greenhouse gas emissions via electricity production, then using wood pellets as a renewable source of energy is unfit for purpose. Assuming that wood pellet biomass emissions become the responsibility of the United States in our land use, land use change, and forestry (LULUCF) sector is unsound. This is because the United States is not intending to adopt the Paris Climate Agreement and is not party to the Kyoto Protocol. Therefore, the United States will not be accounting internationally for LULUCF emissions from wood pellet biomass used for electricity in Japan. This leaves a scenario in which emissions have disappeared from accounting frameworks. Such a serious omission should not be relied upon in order to reduce greenhouse gas emissions: in fact, they are not missing from the atmosphere, only on paper. Alongside scientists and concerned citizens, the International Panel on Climate Change (IPCC) has given a warning about counting wood pellet biomass as carbon neutral: "The production and use of biomass for bioenergy can have adverse side effects, risks for land degradation, GHG emissions, and other environmental development goals."¹¹

We applaud the Japanese government for seeking solutions to climate change. Based on our years of experience working and living with the wood pellet industry in our backyards, we have come to understand that policies promoting the burning of forests are misdirected. Burning trees for electricity releases more carbon into the atmosphere and takes us backward, not forward, on the path to clean energy. **We call on Japan to exclude wood pellet forest-based biomass from definitions of renewable energy and from the *Act on Special Measures Concerning Procurement of Electricity from Renewable Energy Sources By Electricity Utilities*.**

Sincerely,
Dogwood Alliance
Natural Resources Defense Council
John Muir Project
Center for Biological Diversity
Southern Forests Conservation Coalition
Earth Action, Inc.
Environmental Protection Information Center
Wild Heritage
Fern
Pivot Point
Partnership for Policy Integrity

⁹ <https://www.cnn.com/2018/09/17/moodys-hurricane-florence-damage-estimated-at-17-to-22-billion.html>

¹⁰ <https://environmentalintegrity.org/wp-content/uploads/2017/02/Biomass-Report.pdf>

¹¹ Special Report on Climate Change and Land — IPCC site. In: IPCC [Internet]. 2019 [cited 30 Apr 2020]. Available: <https://www.ipcc.ch/srccl/>

North Carolina Climate Justice Collective
350 Triangle
Clean Air Carolina
Restore: The North Woods
Coastal Plain Conservation Group
Spruill Farm Conservation Project