



# Submission to EU Renewable Energy Rules Review re. use of forest biomass

2021

## Submission to EU Renewable Energy Rules Review re. use of forest biomass

Please accept the following comments from the [Ecology Action Centre](#) (EAC). Located in Nova Scotia Canada, EAC is the provinces oldest and largest environmental NGO.

We write to you today to beg, plead and implore you to fix the egregious errors in current European Union climate policy that promotes and incentivizes the harvesting, transportation and burning of huge quantities of wood from forests around the world in a misguided part of an otherwise laudable Green House Gas (GHG) reduction strategy. We ask you to specifically exclude the use of forest biomass as a feedstock fuel for electricity generation, to recognize and count the GHG emissions released by burning wood (i.e. that it is not, in fact, “zero emissions” or “carbon neutral”) and to remove all subsidies related to the harvesting, transportation or burning of forest biomass. These [perverse policy loopholes and incentives](#) are driving a new and growing wave of forest destruction worldwide, harming biodiversity and actually increasing GHG emissions and making climate change worse.

The [IPCC has made it clear](#) that to avoid climate catastrophe we must drastically reduce emissions and increase carbon uptake, mostly by restoring and expanding natural forests. Similarly, [the IPBES has made it clear](#) that over 1 million species - including thousands of forest dwelling species - are at risk of extinction over the next 20 years without, among other things, better habitat protection. Also germane is the [new report](#) released on January 25th by the European Commission's Joint Research Centre (JRC) showing that EU biomass for energy policies are indeed harming forests and the climate as well as the “Green Oath to do no harm” in the [European Green Deal](#).

We will not attempt, in this brief submission, to detail the growing mountain of scientific evidence you already have showing that the current EU policy allowances and incentives with respect to forest biomass are wrong and need to be fixed ASAP. Instead, we will simply refer you to the submission you've received from the US NGO the Partnership For Policy Integrity (PFPI), the [Fixing a Critical Climate Accounting Error](#) paper from Dr. Searchinger, et al and the [letter sent by over 800 scientists](#) from around the world to the European Parliament. We would like to use our limited space to inform you of some of the impacts and threats the current and potentially future EU biomass-for-energy policies are creating here in our jurisdiction.

**Europe sets the example:** Europe has set the policy context that other countries, are following thus compounding the mistake of falsely counting forest biomass as a zero-carbon fuel source and providing subsidies that incentivize large-scale harvesting and burning of natural forests. Citing the European biomass policies, Nova Scotia has followed suit, including forest biomass as a zero-carbon fuel source of so-called “renewable electricity” in its own GHG reduction strategy. This has resulted in the creation of two large wood [biomass electricity generating plants](#) by our domestic electricity provider, Nova Scotia Power, as well as [dozens of smaller, private](#) wood biomass generation plants that sell into the electricity grid. The biomass policy mistakes of Europe have become the biomass policy mistakes of the entire world, including here in Canada.

**Europe creates growing demand for wood biomass from other countries:** Because of the growing demand for fuel wood created by the egregious EU biomass policy flaws and subsidies, foreign jurisdictions are under increasing pressure for wood supply and business interests are eagerly taking advantage of the situation. Situated as we are on the northeastern seaboard of North America, Nova Scotia is particularly vulnerable to the pressures created by this new, subsidy-distorted market for raw wood. In Nova Scotia we already have [one company](#) producing and sending large shiploads of both wood chips and pellets made from Nova Scotia's forests to European biomass plants. The primary source of wood comes from cutting natural forests, both on Crown and private lands, not from so-called “residues” from other wood harvesting processes (e.g. lumber production, etc.). Any trees will do for this purpose. In some cases ecologically rare and important old-growth forest stands on Crown land have been [“accidentally” harvested for biomass](#), in direct opposition to Old Growth Forestry policy. In many other cases very young, forest stands have similarly been razed to the ground to provide raw biomass feedstock, well

before economic or ecological maturity (see photos below of a recent Nova Scotia biomass harvest on private land).



More recently dubious foreign business interests have been aggressively promoting [a plan to build a huge biomass pellet plant](#) in Nova Scotia to feed European biomass plants. This kind of high-volume, low-value commodity production would be the worst possible thing we could do to our forests and would result in further forest loss and degradation. The EAC is [dead set against this terrible proposal](#) and will fight it tooth and nail. But as long as Europe continues to create and artificially prop up biomass fuel “markets”, industrial biomass projects like this will continue to be proposed and built here and elsewhere.

To be clear, the EU policies and subsidies that incentivize conversion of power plants from burning fossil fuels to forest biomass is driving the destruction of forests here in Nova Scotia and in many other jurisdictions to provide wood fuel feedstock. If this is not corrected now as part of this 2030 Climate Target Initiative process, it will accelerate and exacerbate both climate change and biodiversity loss well beyond Europe. In this regard it is like watching colonialism all over again, wherein the natural riches of the “new world” are plundered to feed an insatiable Europe, regardless of the costs to those other countries, the atmosphere or global biodiversity. The EU simply **MUST** fix this terrible mistake before it causes any more damage to the world’s forests. This is precisely the time in humankind’s history when we need to protect, restore and expand natural forests, as both carbon sinks and critically important habitats for biodiversity. And no, tree plantations are not an acceptable substitute for natural forests on either of those fronts, despite the falsehoods industry promoters tell regulators and the public.

## **In conclusion**

While the European Union is to be commended for pursuing more aggressive GHG reduction targets via its 2030 Climate Target Plan Initiative and the revision of the RED, the credibility of the whole system is at risk if forest biomass is continued to be allowed and to be counted as “zero-carbon” emitting. Now is the time to fix the [Critical Climate Accounting Error](#) by removing forest biomass from the plan altogether, removing all subsidies and incentives for forest biomass harvesting, transportation and burning in European power plants and accurately counting the carbon released by burning biomass.

In so doing, the European Union would re-establish itself as the leading jurisdiction in the fight against global warming and would help re-orient the rest of the world away from using forest biomass as a fuel for electricity generation. Failure to do so will result in the European Union leading the world towards more forest destruction, accelerating biodiversity loss and more GHGs pouring into the atmosphere uncounted. In other words, don't make things worse, fix what's wrong.

What the European Union does next with regards to the use of forest biomass matters a great deal to the whole planet in terms of either preserving forest carbon sinks and refuges for wild species or destroying them and making climate change worse. It really is that simple. We implore you to ignore the industry promoters, listen to the science and use your common sense. Burning anything releases GHGs. In this regard, trees are no different than coal or oil and due to the relatively low amount of stored energy in wood, is actually worse for the atmosphere than fossil fuels. Please put a stop to this destructive consumption of the world's forests, based on the false premise of carbon neutrality and help lead the world towards a truly sustainable, low-carbon future.

Sincerely yours,

**Raymond Plourde**

Senior Wilderness Coordinator  
Ecology Action Centre  
Halifax, Nova Scotia, Canada

