

To: Secretary of the Dutch Economic Affairs Commission  
From: Dogwood Alliance, NRDC, SELC

Dear Ms. Franke,

We, the below signed groups, strongly encourage the Dutch government to halt the biomass co-firing subsidies in the "*Algemeen Overleg Energie*" debate on February 10th.

While we appreciate the Dutch government's time and effort spent to develop sustainability requirements for forest-based biomass, there are still a range of ways in which sustainability priorities can be either misinterpreted or difficult to enforce. Given the clear climate benefits of wind, solar, tidal, energy efficiency and other pathways, supporting industrial biomass with subsidies meant to reduce near-term carbon emissions and improve the health of our planet is delaying necessary progress.

Seventy-five percent of the US wetland forests are found in the Southeastern US. Ninety percent of these forests are classified as highly vulnerable<sup>1</sup> and the biomass industry's footprint represents an unprecedented new threat to this forest type. Given that electricity can be generated from sources such as wind, solar, tidal and other pathways that are not controversial and don't degrade forests, it is critical that the Netherlands consider this important reality when allocating subsidies for renewable energy.

America's wetland forests help fight climate change by serving as "carbon sinks," pulling carbon out of the atmosphere and storing it in the vegetation and soils. According to USDA Forest Service, these forests of the Southeast region are among the top-ranking carbon rich forests in the US<sup>2</sup>. In addition, these forests help mitigate the impacts of floods and protect valuable water resources. Accelerated logging and conversion in these forests is destroying one of the nation's best defenses against climate change.

As can be evidenced by a wide range of reports<sup>3</sup>, investigations, and multimedia explorations<sup>4</sup>, the biomass industry and pellet producers are impacting sensitive forest types and also affecting the health of local community members.

It's indisputable that biomass power plants emit more CO<sub>2</sub> per megawatt-hour than coal or gas plants. The UK's biomass carbon calculator BEAC has shown that even when re-sequestration is taking into account the use of forest biomass for electricity can result in up three times more net GHG emissions than burning coal.<sup>5</sup>

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<sup>1</sup> <http://www.nrdc.org/energy/files/southeast-biomass-exports-report.pdf>

<sup>2</sup> <http://www.fia.fs.fed.us/forestcarbon/default.asp>

<sup>3</sup> [https://www.southernenvironment.org/uploads/audio/2015\\_06\\_02\\_Cover\\_letter\\_to\\_UK\\_EU\\_Re\\_SIG\\_report.pdf](https://www.southernenvironment.org/uploads/audio/2015_06_02_Cover_letter_to_UK_EU_Re_SIG_report.pdf)

<sup>4</sup> <http://www.dogwoodalliance.org/campaigns/bioenergy/bioenergy-reports/>

<sup>5</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/349024/BEAC\\_Report\\_290814.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/349024/BEAC_Report_290814.pdf) ]

Biomass-based energy generation is fundamentally flawed due to the significant time delay in which emission reductions can be achieved, the high degree of uncertainty for adequate post-harvest regrowth ever happening in an ever changing climate, and extreme lack of accountability of the offset scheme for which biomass combustors blindly take credit.

In addition, it has been shown by multiple studies that biomass incineration creates fine particulate pollution that impacts human health<sup>6</sup>, leading to significant respiratory problems and disrupting residents living near the facilities. This industry is not the type of economic development that our country needs. Our organizations are increasingly being asked to support efforts to push back against proposed pellet manufacturing facilities, and many residents are beginning to blame EU policies for this environmental justice problem.

Forests represent our best defense against climate change. Now is not the time to open the floodgates for forests to be used as fuel for electricity. Instead, we need to accelerate efforts to protect our forests and improve ecosystem health.

We urge Dutch government to hear the concerns of national, regional, and local organizations on this issue by halting the subsidies for biomass co-firing in the Netherlands.

Thank you,

Adam Macon, Campaign Director  
Dogwood Alliance

Debbie Hammel, Director – Land Markets Initiative  
Natural Resources Defense Council

David Carr, Senior Attorney  
Southern Environmental Law Center

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<sup>6</sup> <http://www.pfpi.net/wp-content/uploads/2011/06/ala-energy-policy-position.pdf>