

Episode 36 D Forest Defenders' Markup of 8 29 2022 Wood Burning Industry letter to EU MEPs ahead of 9 14 2022 vote

The Forest Defenders Alliance wrote: "Dear Members of the European Parliament, The Forest Defenders Alliance (F D A) would not like to leave a letter from the World Bioenergy Association (an Industrial Wood Burning organization) (W B A) without comment when it has reached so many of you. Many statements in the letter are incorrect or used in a misleading way. We ask that you consider our critique as you make your decision on biomass policy reforms in R E D III. Respectfully, the Forest Defenders Alliance (F D A). "

36 D 1 The World Bioenergy Association (W B A) Lobbyist wrote: Amendment deleterious for climate protection. The Forest Defenders Alliance (F D A) wrote: Misleading. Climate mitigation requires reducing emissions and storing more carbon. The EC's own scientists say logging and burning forest biomass increases emissions compared to fossil fuels and degrades carbon storage. Residents Against Wood Smoke Emission Particulates (RAWSEP): Agree with FDA.

36 D 2 The World Bioenergy Association (W B A) Lobbyist wrote: Amendment deleterious for maintenance of healthy forests. The Forest Defenders Alliance (F D A) wrote: Misleading. The 2021 J R C biomass report found removing and burning "coarse woody debris" which includes logging residues, is "high risk" to ecosystems, biodiversity, and climate. Residents Against Wood Smoke Emission Particulates (RAWSEP): Agree with FDA.

36 D 3 The World Bioenergy Association (W B A) Lobbyist wrote: Amendment deleterious for European energy security. The Forest Defenders Alliance (F D A) wrote: Misleading. No one is proposing a ban on wood-burning. The reform would stop energy from burning trees from counting toward R E targets. Residents Against Wood Smoke Emission Particulates (RAWSEP): Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 d 4 The World Bioenergy Association (W B A) Lobbyist wrote: Amendment deleterious for European energy security. The Forest Defenders Alliance (F D A) wrote: Further, to replace just 10% of Russian fossil fuels with wood would require increasing wood-burning by 60%. Any such increase in logging would fatally undermine EU's legislated goals to restore nature and reduce emissions. Residents Against Wood Smoke Emission Particulates (RAWSEP): Agree with FDA.

36 D 5 The WBA Lobbyist wrote: Our views will be stress tested by the assembled experts on 9/7/2022. The FDA wrote: Since no experts with different opinions are invited to the event, we suspect that a stress test will not take place. RAWSEP: Agree with FDA.

36 D 6 The WBA Lobbyist wrote: level of harvested wood is well below level of wood being regrown. The WBA Lobbyist wrote: increasing biodiversity in forests. The FDA wrote: Renaturalizing forests is a good idea, but why not do it gradually as each plantation is harvested? It will be hard enough to do this without accelerating harvesting. RAWSEP: Agree with FDA.

36 D 8 The WBA Lobbyist wrote: growing stock of wood increased between 1990 and 2020. The FDA wrote: This isn't the whole story. The E U forest carbon sink is decreasing... each year, forests store less carbon. Some member states have lost their carbon sinks entirely, like Finland and Estonia. RAWSEP: Agree with FDA.

36 D 9 The WBA Lobbyist wrote: level of harvested wood is well below level of wood being regrown. The FDA wrote: Misleading, irrelevant. Whether or not it's true that growth exceeds harvesting in the EU, this is irrelevant to the climate impacts of burning forest biomass for energy. As the EC's own 2016 impact assessment for biomass concluded, "Certain forest management practices can enhance the carbon sink, but ensuring that the harvest level stays below the growth rate of the forest is not sufficient to ensure climate change mitigation." RAWSEP: Agree with FDA.

36 D 10 The WBA Lobbyist wrote: Forested land has increased 10% in the last 30 years. The FDA wrote: Forests are expanding due to establishment of plantations, which are not a substitute for natural forests. They have 1 – 3 tree species and almost none of the diversity and functions of a natural forest. RAWSEP: Agree with FDA.

36 D 11 The WBA Lobbyist wrote: trees are constantly and immediately replaced. The FDA wrote: Misleading. Trees are not "immediately replaced" – that's not possible. Regrowing them takes years to decades to centuries. Just because the

EU's forests as a whole grow more wood each year than is harvested does not mean that emissions from burning wood are instantaneously offset, though that's what would need to happen for biomass to be "carbon neutral." In fact the emissions from logging forests are recorded in the land sector, and it's now apparent that over-harvesting is one reason why the EU's forests and land sector takes up less carbon each year. Claiming that forest growth in one place constantly and immediately offsets emissions from logging and burning wood somewhere else is an accounting trick that would not be tolerated in the world of business or banking. RAWSEP: Agree with FDA.

36 D 12 The WBA Lobbyist wrote: using sustainable biomass is a contribution to climate protection. The FDA wrote: Here's what the I P C C says about "sustainable" biomass and climate: "The I P C C Guidelines do not automatically consider or assume biomass used for energy as 'carbon neutral', even in cases where the biomass is thought to be produced sustainably". Elsewhere the I P C C obviously acknowledges that logging and burning wood adds to atmospheric CO<sub>2</sub>. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 13 The WBA Lobbyist wrote: no scientific evidence that using biomass is worse than using fossil fuels. The FDA wrote: False and misleading. In fact there are numerous peer-reviewed studies, some by EC's own scientists, essentially stating the same thing as the I P C C, that "sustainability" is basically irrelevant to the climate impact of burning wood. See for EC impact assessment, for 2021 J R C report, and for online model. RAWSEP: Agree with FDA, up to a point. The FDA wrote: The "80% reduction" claim is misleading because the calculation does not include any CO<sub>2</sub> from actually burning the biomass, meaning it counts as "zero" smokestack emissions that are actually greater than coal. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 15 The WBA Lobbyist wrote: B E C C S is the only readily available technology. The FDA wrote: False. Biomass with carbon capture and storage (B E C C S) is not "readily available". Even if it were, as the I P C C states "The concept of B E C C S rests on the premise that bioenergy production is carbon neutral... wood-based B E C C S may not be carbon negative in the first decades, initially emitting more CO<sub>2</sub> than sequestering". RAWSEP: Agree with FDA, up to a point. Whether it is called carbon negative or not, wood burning at any time means an increase in PM 2.5 air pollution.

36 D 16 The WBA Lobbyist wrote: B E C C S is a technology we urgently need to get close to climate goals. The FDA wrote: Misleading and dangerous. B E C C S won't work but restoring and protecting forests to store more carbon and provide a home for nature can help. But EC policymakers haven't come clean about the true extent they're relying on future B E C C S to save us. You should worry. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 17 The WBA Lobbyist wrote: this creates the need for increased harvesting. The FDA wrote: Misleading. In fact there's increasing evidence to suggest that the EU is harvesting more wood than it's growing. This is certainly the case in some member states where there is total loss of the carbon sink. RAWSEP: Agree with FDA.

36 D 18 The WBA Lobbyist wrote: this creates the need for increased harvesting The FDA wrote: This doesn't follow. Nothing about the goal of re-naturalizing forests requires "increased" harvesting, especially given the EU's goal of storing more carbon in the land sector by 2030, which will require decreased harvesting. RAWSEP: Agree with FDA.

36 D 19 The WBA Lobbyist wrote: threat of severe forest fires. The FDA wrote: These claims about fire risk are misleading. International research shows that natural, shaded, intact forests are the most fire-resistant. Meanwhile, it's climate change, drought and the flammability of plantations that's driving the EU's fire outbreak, not the relative abundance of residues. RAWSEP: Agree with FDA.

36 D 20 The WBA Lobbyist wrote: equivalent to wind and solar combined. The FDA wrote: While yes, forest biomass provides about 20% of the EU's renewable energy on a energy input basis (meaning the energy inherent in the fuel) in terms of energy output (energy "produced"), it's not correct to claim it beats out "all energy produced from windmills and photovoltaic combined". Burning biomass is extremely inefficient so it takes a disproportionate amount of energy input to generate "useful" energy output. Thus together, wind and solar produced over 542 WGh of energy in 2020.

250% the energy from all solid biomass burned for energy – not just forest biomass. See the graphic at the bottom of the page, showing percentages of wind, solar and biomass used now for energy in the E U. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 21 The WBA Lobbyist wrote: meeting targets will become impossible. The FDA wrote: Alarmist and misleading. Again, the proposal to stop counting forest biomass toward R E targets will not “exclude” use of wood or prohibit wood-burning in any way. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 22 The WBA Lobbyist wrote: will accelerate the move back to coal. The FDA wrote: Wood-burning is the biggest source of particulate pollution in the E U , emitting c. five times as much particulate matter as the transport sector. Air pollution kills more than 1,000 E U citizens per day prematurely. Wood-burning power plants emit as much or more P M as coal plants, per MWh. No one wants to go back to coal – but it’s misleading to imply that wood-burning is “clean”. RAWSEP: The Forest Defenders Alliance is FINALLY DISCUSSING THE HEALTH IMPACTS OF WOOD BURNING. Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 23 The WBA Lobbyist wrote: jeopardize European efforts to lower Greenhouse Gases (G H Gs). The FDA wrote: Physics dictates that burning wood emits more C O<sub>2</sub> than coal per unit energy produced, and emits it instantaneously, while it takes decades to centuries for forest regrowth to offset those emissions. The carbon math thus demonstrates that burning forest wood does not “reduce” GHG emissions in a timely way. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 24 This is Forest Defender’s 1 of 2 comments on the entire letter. The FDA wrote: To reverse the trend of carbon loss in the E U’s existing forests and meet even the weak land sector carbon targets, the E U must increase the carbon stored in forests. The E U should protect and restore forests, not burn them for fuel. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?

36 D 25 This is Forest Defender’s 2 of 2 comments on the entire letter. The FDA wrote: Further, the fact that 20% of renewable energy input comes from forest biomass is actually good news, because the much lower amount of energy produced on an output basis can be relatively easily replaced with truly clean actual generation, including helping people out of the energy poverty trap that the E U’s biomass policy creates by continuing to subsidize bioenergy instead of heat pumps and solar. RAWSEP: Agree with FDA, up to a point. What is controversial about banning wood burning? What is controversial about needing clean air for humans to breathe, in order to live?