



December 3, 2020

## NGO JOINT STATEMENT

### Stop Biomass Power Generation with Large-scale Fuel Import

Recently, Japanese Prime Minister Suga announced a policy to reduce greenhouse gas emissions to virtually zero by 2050. While we believe it is important to promote renewable energy, we are concerned that promoting large-scale biomass power generation which is predicated upon fuel imports could threaten biodiversity and accelerate climate change.

In Japan, biomass power generation is promoted by the FIT (Feed-in Tariff Program for Renewable Energy), using a levy added to our electricity bills, in the belief that it is good for the environment. In recent years, however, there has been an increase in the construction of large-scale biomass power plants reliant upon fuel imports from overseas, resulting in a rapid increase in fuel imports such as wood pellets and palm kernel shells (PKS).

In particular, the volume of wood pellets imported into Japan in 2012 was about 72,000 tons, and in 2019, it was about 1.61 million tons, an increase of more than 20 times.<sup>1</sup> In a few years, imports, mainly from North America, are

<sup>1</sup> Ministry of Finance. Trade Statistics.

expected to surge, totaling more than 3 million tons. However, in the United States and Canada, it is reported that due to the rapid increase in wood pellet production for export, natural forests such as wetland forests are being clear-cut with major impacts on ecosystems.<sup>2</sup> In Canada, it has been pointed out that deforestation for wood pellet production is also affecting caribou habitats and indigenous peoples.<sup>3</sup> It is sometimes said that scrap wood from sawmills is used as the raw material for pellet production, but in reality, with the expansion of pellet production for export, whole logs are often used as the raw material. The large volumes utilized result in intensification of logging and in logging incursions to places such as swamp forests that otherwise would not have been economic to log.

Large-scale biomass fuel production will cause deforestation and forest degradation, which will have a major impact on biodiversity and accelerate climate change. At present, biomass power generation is regarded as "carbon neutral" and is automatically eligible for the FIT in Japan. However, when the production of biomass fuels contributes to deforestation and degradation, the carbon stock stored in forests and soil decreases and carbon dioxide is released into the atmosphere. Even if forests regrow, until that time CO<sub>2</sub> will have increased in the atmosphere for a period of decades or centuries. When the fuels are imported and burned to generate energy in Japan it results in large, immediate emissions to the atmosphere. This is however not counted as emissions of Japan. Also, fuel imports from overseas naturally emit a large amount of GHGs due to the long transportation distance. For example, Japan imports a large amount of wood pellets from Canada, and the GHG emissions from their transport amount to 17.2 g-CO<sub>2</sub>/MJ, which accounts for more than

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<sup>2</sup> Stand. Earth. "Investigation - Canada's growing wood pellet export industry threatens forests, wildlife and our climate." Apr. 2020.

Partnership for Policy Integrity and Dogwood Alliance. "Carbon Emissions and Climate Change Disclosure by the Wood Pellet Industry – A Report to the SEC on Enviva Partners LP." Mar. 2016.

<sup>3</sup> Stand. Earth. "Investigation - Canada's growing wood pellet export industry threatens forests, wildlife and our climate." Apr. 2020.

70% of their total lifecycle GHG emissions.<sup>45</sup> Therefore, biomass power generation is by no means carbon neutral. GHG emissions throughout the lifecycle should be evaluated and taken into consideration.

The current FIT planning guidelines do not include assessments of GHG emissions throughout the lifecycle of biomass power generation operations. In addition, the description of sustainability assessment for forest biomass fuels is ambiguous and left to the operators. This is not sufficient to prevent adverse impacts on forest ecosystems in extreme cases such as clear cutting of natural forests for fuel production. Projects that are not expected to reduce GHG emissions or that involve deforestation/forest degradation should be excluded from the FIT, including those that have already been approved.

We believe that biomass power generation should be small-scale and distributed, based on the principles of local production for local consumption and cascading use, and provide both heat and power. We believe that large-scale biomass power plants using imported fuels should be discontinued as they further accelerate the biodiversity and climate crisis.

In Japan, there have been reports that biomass fuels are co-fired with coal at inefficient coal-fired power plants, which is regarded as "high efficiency" but this is merely an accounting trick to prolong the life of coal-fired power plants and should not be permitted.

Signatories:

Friends of the Earth Japan

Kiko Network

Institute for Sustainable Energy Policies

Japan Center for a Sustainable Environment and Society

Greenpeace Japan

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<sup>4</sup> Calculations derived from this METI commissioned report:

Mitsubishi UFJ Research and Consulting. *Survey Report Regarding the Procurement of Stable Supplies of Biomass Fuel and Sustainability*. Feb. 2019. p. 108 (Japanese)

<sup>5</sup> This excludes the emissions from combustion

Biomass Industry Network  
Global Environmental Forum  
HUTAN Group  
Japan Tropical Forest Action Network  
Japan Community Power Association  
Oratte Niigata Community Energy  
ARA  
Australian Forests and Climate Alliance  
Biofuelwatch  
Dogwood Alliance  
Estonian Forest Aid (Eesti Metsa Abiks)  
Fern  
Friends of the Earth US  
Global Justice Ecology Project  
Healthy Forest Coalition Nova Scotia  
Leefmilieu  
Mighty Earth  
NOAH Friends of the Earth Denmark  
NRDC (Natural Resources Defense Council)  
Partnership for Policy Integrity  
Pivot Point  
Rainforest Action Network  
Rettet den Regenwald e.V.  
Save Estonian Forests  
Solutions For Our Climate (SFOC)  
Southern Environmental Law Center  
WOLF Forest Protection Movement  
Wild Europe