

Dear Sir/Madam,

Re: RWE Permit Application for Eemshaven Power Station

We are writing to jointly object to the RWE's permit application related to their Eemshaven Power Station, which we understand will be reconsidered by the Province of Groningen following a recent court decision.

We believe that continued operations of this power station – regardless of the proportions of coal and wood pellets burned – is incompatible with the Dutch government's climate commitments and the goals of the Paris Climate Agreement, as well as with the EU Nature Directive, and that it should be closed. However, in our objection we focus specifically on the reasons why the burning of wood pellets in the Eemshaven plant is not sustainable and not low-carbon, and why the proposed doubling of the amount of wood pellets burned would result in further harm caused to forest ecosystems in the Baltic States, the Southeastern USA, British Columbia and possibly elsewhere, without resulting in lower greenhouse gases relative to coal burning.

A new permit for the Eemshaven plant, including increased wood pellet burning, is not compatible with the Dutch government's climate commitments and responsibilities under the Paris Climate Agreement:

Graanul Invest, Pinnacle Renewable Energy and Enviva all routinely source roundwood, including from mature trees, for their wood pellets. This has been confirmed by NGO investigations and, in the case of Enviva and Graanul Invest, by independent media investigations.¹ Dutch sustainability criteria do not prevent the burning of such pellets made from roundwood.

As a [peer-reviewed study](#) shows that not even the burning for energy of logging residues that would otherwise be left to decompose in the forest is compatible with the Paris Agreement goal of limiting global warming to well below 2 degrees. However, the burning of wood pellets derived from roundwood has a far worse climate impact. The [European Academies Science Advisory Council](#) points out: *"carbon emissions per unit of electricity generated from forest biomass are higher than from coal and thus it is inevitable that the initial impact of replacing coal with forest biomass in power stations is to increase atmospheric carbon dioxide levels."* A recent letter signed by over 500 scientists states: *"the result of this additional wood harvest [for bioenergy] is a large initial increase in carbon emissions, creating a "carbon debt," which increases over time as more trees are harvested for continuing bioenergy use. Regrowing trees and displacement of fossil fuels may eventually pay off this carbon debt, but regrowth takes time the world does not have to solve climate change. As numerous studies have shown, this burning of wood will increase warming for decades to centuries. That is true even when the wood replaces coal, oil or natural gas."*

Little transparency about the sourcing of RWE's wood:

1 For Enviva, see: dogwoodalliance.org/2019/06/caught-in-the-act/, dogwoodalliance.org/2020/05/enviva-continues-to-destroy-natural-forests/, climatecentral.org/news/pulp-fiction-the-series-19592, climatecentral.org/news/pulp-fiction-the-series-19592, nyheder.tv2.dk/samfund/2019-09-09-tv-2-afsloerer-fejl-i-klimakontrol-helt-sort-siger-ekspert, imdb.com/title/tt8288424/; for Graanul Invest, see: vpro.nl/argos/lees/onderwerpen/money-to-burn/2020/how-estonian-trees-fuel-our-biomass-plants.html, biofuelwatch.org.uk/2019/estonia-pellets/; for Pinnacle Renewable Energy/Pinnacle Pellets: stand.earth/sites/stand/files/report-canada-wood-pellet-industry.pdf

RWE has consistently failed to answer questions from civil society groups about the sourcing of their wood pellets. A [recent publication by Natuur en Milieu](#) highlights the lack of transparency about where pellets burned in Dutch coal plants come from and how they are sourced. We know from shipping records and media reports that Graanul Invest is a major supplier of wood pellets to RWE NL, and we know from reports published by [Enviva](#) (Southeastern USA) and [Pinnacle Renewable Energy](#) (British Columbia) that those companies have supply contracts for RWE (who do not burn wood pellets anywhere other than in their Dutch coal power stations). However, RWE may well be burning pellets from elsewhere, especially [Russia](#).

Impacts of Graanul Invest's pellet production on Estonian and Latvian forests:

A [2020 report by Estonian Fund for Nature and Latvian Ornithological Society](#) analysed the impacts which the growing wood pellet production for export is having on both countries forests, on forest carbon sinks, and on forest birds.

In both countries, logging has been intensifying in recent years. In 2019, Latvia recorded its highest logging volume in 19 years, and logging volumes tripled in Estonia between 2008 and 2018. Clearcutting is the dominant logging method. The large majority of forests in the region are semi-natural, i.e., they have been previously logged but consist of mixed native species and remain important for wildlife.

In both Latvia and Estonia, logging is happening in Natura 2000 and other supposedly protected sites, too. Also in 2020, a team of European investigative journalists [documented evidence](#) of significant logging inside Haanja National Park in Estonia, where Graanul Invest (Europe's largest pellet producer and a Drax supplier) owns dozens of forest plots. [Estonia's forest birds are declining at a rate of around 50,000 breeding pairs a year](#). In Latvia, the Hazel grouse declined by 79% from 2005 to 2018, and the Black stork by 60% from 1989 to 2018.

In both countries, excessive logging, including for wood pellet production for export to the Netherlands and elsewhere, is depleting the forest carbon sinks, causing less CO₂ being sequestered. According to an Estonian report submitted under Articles 13 and 14 of Regulation (EU) 525/2013 demonstrates, under the current policies, the country's LULUCF Sector would turn into a net source of greenhouse gas emissions by 2034, and the forest carbon sink is projected to decrease by almost 50% over the next five years. The National Energy and Climate Plans (NECPs) submitted to the EU by both Estonia and Latvia confirm that both countries are expecting the progressive loss of their forest carbon sinks due to logging.²

Impacts of Enviva's pellet production on forests in the Southeastern USA.

As stated above, investigations by US environmental NGOs and media teams show that wood used in Enviva pellet mills is routinely sourced from clearcuts of mature hardwood forests in a region designated as the [North American Coastal Plain Global Biodiversity Hotspot](#). They also document that vast quantities of whole trees and other large-diameter wood—biomass feedstocks known to be particularly high-carbon—are entering the biomass industry's supply chain. In 2016, a [peer-reviewed study modelled likely future wood sourcing for bioenergy](#) (including pellets for export) in the southern USA. It concluded that "*Our results demonstrate the complex landscape effects of alternative bioenergy scenarios [and] highlight that the regions most likely to be affected by bioenergy production are also critical for biodiversity*". Even if the

² See media.voog.com/0000/0037/1265/files/Biomass_report_ENG%20_2020.pdf and references in that report.

area classified as 'forest land' was to increase in the context of increased biomass, the "remaining forest [would be] composed of more intensively managed forest and less of the bottomland hardwood and longleaf pine habitats that support biodiversity", i.e., there would be more conifer plantations and less biodiverse forests. Impacts to the region's highly biodiverse natural forests have been demonstrated by NGO investigations as well as investigations by reporters.

British Columbia, Canada:

[Investigations by the North American environmental NGO Stand.earth](#) show that most of Pinnacle's Pellet's seven wood pellet facility "haul zones" in British Columbia overlap with vital primary forests and threatened species, including caribou, habitat. In 2020, investigations by Stand.earth and Conservation North revealed that [roundwood from mature trees](#) is being sourced by Pinnacle Pellets.

British Columbia has already seen the [great majority of its primary and old growth forests logged](#), and very few of its remaining primary forests and sensitive forest habitats are legally protected. The growing wood pellet industry for export, including to the UK, poses a serious threat to those forests.

Communities living near Pinnacle pellet plants have frequently expressed concerns about [threats to the Boreal forest](#). Those forests are home to more than 600 Indigenous communities, many of whose cultural identities are entwined with the forest. Widespread logging of boreal forests for biomass [threatens](#) many Indigenous Peoples' cultures and livelihoods.

All of this evidence shows that the burning of wood pellets in Eemshaven power station cannot be considered climate-friendly or sustainable, and that it contributes to the overexploitation of forests and forest degradation, likely including in primary forests in British Columbia. We therefore hope that the permit application will be rejected.

Yours faithfully,

Coraina de la Plaza, Global Forest Coalition

Almuth Ernsting, Biofuelwatch, UK/USA

Rita Frost, Dogwood Alliance, USA

Heather Hillaker, Southern Environmental Law Center, USA

Anne Petermann, Global Justice Ecology Project, USA

Siim Kuresoo, Estonian Fund for Nature, Estonia