

November 29, 2023

Open letter to the Ministry of Economy, Industry and Trade, Government of Japan

Subject: Japanese government should stop supporting biomass power that destroys both climate and forests

Dear Mr. Yasutoshi Nishimura, Minister of the Ministry of Economy, Industry and Trade,

Since Japan introduced the Feed In Tariff system in 2012, biomass power generation has increased rapidly in Japan. Most of the fuel is imported from overseas.

Increasing biomass fuel demand will cause deforestation and forest degradation, threatening biodiversity and accelerating climate change by reducing carbon storage in forests and soils.

Japan imported more than 1.4 million tons of wood pellets from Canada in 2022. Many of those pellets came from trees logged in British Columbia, including trees in rich temperate rainforests. More than 100 scientists¹ recently called for a halt to the degradation of Canada's primary forests by industrial logging and 27 prominent Canadian conservation organizations² called for an end to biomass subsidies and wood pellet exports from Canada.

Precious forests formed over thousands of years are not only rich in biodiversity and home to numerous wildlife species, including large mammals such as caribou and bears, but also store large amounts of carbon in trees, leaf litter, and soil. Such forests, once cleared, require hundreds of years to recover. Cutting down these forests to meet Japan's energy needs is unacceptable.

Biomass combustion emits large amounts of CO₂. CO₂ emissions per energy produced by wood combustion are higher than those of coal fired power plants. However, the emissions from the stack are not properly counted. That distorts decision-making, resulting in the promotion of biomass power generation as "carbon neutral" in the FIT system. Policy support has also been given to co-firing biomass in coal-fired power plants and switching from coal-fired power plants to exclusively firing biomass.

Although the current guidelines for FIT project planning require confirmation of sustainability of the fuel, they do not actually prevent deforestation and degradation in production areas.

¹ [Scientists call on Canada to focus on logging for forest protection | Canada's National Observer: Climate News](#)

² [An open letter to Hon. Steven Guilbeault and Hon. Jonathan Wilkinson on utility-scale electricity generation from forest-based biomass - Stand.earth](#)

For imported woody biomass, they are required to confirm its sustainability based on the "Guidelines for proving the legality and sustainability of wood and wood products" formulated by the Forestry Agency in 2004 before the FIT system began. Methods to confirm sustainability of wood products include "certification by relevant organizations," and "independent efforts by individual companies" and it is up to the companies, and no clear standards have been shown for the sustainability of woody biomass.

As environmental NGOs with strong concerns about the climate and forest crises, we request you to:

- Stop support for biomass power generation using imported biomass fuels that destroy climate and forests
- Include CO2 emissions from combustion by biomass power generation in GHG assessments
- Exclude projects with imported biomass fuels that cause deforestation or degradation from FIT
- Adopt the cascade principle - whole trees should be prohibited from use as biomass fuels
- Not promote co-firing of biomass into coal-fired power plants nor conversion of coal-fired power plants to biomass power plants

Conservation North- *Canada*

Friends of the Earth Japan -*Japan*

Mighty Earth- *United States*

HUTAN Group -*Japan*

AbibiNsroma Foundation- Ghana

Nature Nova Scotia-*Canada*

Pivot Point - *USA*

Federation Against Biomass Powerplant - *Netherlands*

De Klimaatcoalitie - *Netherlands*

EDSP ECO - *Netherlands*

Trend Asia - *Indonesia*

Biofuelwatch, *Europe/USA*

Colectivo VientoSur - *Chile*

Sahabat Alam Malaysia (Friends of the Earth) -*Malaysia*

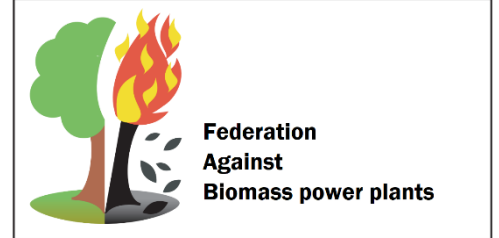
Global Environmental Forum - *Japan*

Kiko Network - *Japan*

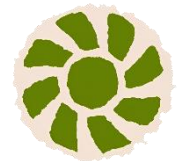
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Pivot Point



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