The Rt Hon. Claire Coutinho M.P. Secretary of State for Energy Security and Net Zero 3-8 Whitehall Place 6th Floor London SW1A 2EG United Kingdom

Dear Secretary of State,

We are writing in response to your government's proposal to extend an estimated billions of pounds in subsidies incentivizing the burning of forest-based wood pellets for energy generation.¹ Canada is the United Kingdom's second largest source for wood pellets, and we represent a group of organizations working to safeguard Canada's primary forests.² Your proposal would extend public funding for forest biomass indefinitely beyond 2027 based on the unfounded assumption that Bioenergy with Carbon Capture and Storage (BECCS) could cancel out the carbon emissions from logging forests and burning forest biomass as energy.³ This is a perilous gamble that risks incentivizing more industrial logging across Canada, with harmful consequences for threatened species and the global climate.

We urge you to stop mischaracterizing wood from primary forests as a pathway toward "net zero" carbon emissions.⁴ The U.K.'s proposal would contribute to the ongoing loss of some of the world's last primary forests, by sourcing pellets from them. Investigative research in Canada, as well as industry's own reporting, shows that the biomass industry is creating wood pellets both directly from whole trees, and as a coproduct along with other wood-based materials.⁵ This means that demand for wood pellets is helping to drive industrial logging across Canada. Investigations have also revealed that power companies like Drax – the U.K.'s largest consumer of Canadian wood pellets, a substantial producer of these pellets, and a major recipient of both your current and proposed subsidies– sources wood pellets in part from primary forests.⁶

The industrial logging of primary forests for materials including wood pellets is irreversibly harming them, eroding the habitat of threatened species, and releasing emissions that are exacerbating the climate crisis.⁷ Canada contains some of the world's last unbroken stretches of primary forest, but much of this area is threatened by Canada having the third highest rates of intact forest landscape loss in the world.⁸ Industrial logging, one of the key drivers of this loss, has contributed to the population decline of threatened species including woodland caribou and various songbirds by degrading their habitat.⁹ The logging and disturbance of these forests' deep carbon stores is rapidly releasing greenhouse gas emissions, a threat which is compounded when that wood is turned into wood pellets, shipped overseas, and burned in industrial power plants.¹⁰

Scientific evidence corroborated by the Canadian government shows that logging primary forests and exporting wood pellets to be combusted in power plants releases greenhouse gas emissions on par with fossil fuels, especially on the timescale that scientists say is urgent to reduce climate emissions to avoid irreversible tipping points.¹¹ While biomass proponents claim that tree planting efforts cancel out the emissions associated with logging forests and burning those pellets, experts estimate that the "carbon debt" from these operations can take hundreds of years to repay.¹² It is clear that the U.K.'s proposal would contribute to a carbon debt much longer than the country's 2050 net zero target, and make the U.K. a laggard in the global fight against climate change.

The U.K.'s plan to rely on large-scale BECCS – an unproven technology – to justify the ongoing burning of wood pellets is both a gamble and a false solution.¹³ Even if BECCS' technology were to somehow dramatically improve, forest biomass would still emit large volumes of carbon dioxide throughout the logging and production cycle that would not be captured – emissions that could contribute to exceeding critical climate thresholds in the next few decades.¹⁴ Evidence from the U.K. and Canada's own government watchdogs show that the true emissions associated with logging and burning Canadian biomass are not being adequately measured and reported by governments, which means it is reckless to characterize forest biomass as carbon neutral.¹⁵ Spending billions of taxpayer pounds on this unfounded experiment comes at the cost of cleaner energy that could otherwise be rapidly expanded. For example, experts at the University of Oxford recently highlighted that wind and solar energy could power the U.K. within decades, if properly supported by government policies.¹⁶ Your proposal risks undermining that potential, instead creating a growing demand for a highly emitting energy source that incentivizes the logging of primary forests.

While broadly expanding the use of wood pellets for power generation in the U.K. risks global climate progress, the prospect of giving much of this public funding to Drax is particularly egregious. Drax's North Yorkshire power plant is estimated as the U.K. power sector's largest single source of CO₂.¹⁷ In response to evidence that Drax uses pellets made in part from primary forests in British Columbia, Drax has claimed that British Columbia does "not use" the primary forests "terminology."¹⁸ However this term is widely used across international frameworks and scientific literature, and the definitions accompanying the United Nations Convention on Biological Diversity – to which both Canada and the U.K. are signatories – describes a primary forest as "a forest that has never been logged and has developed following natural disturbances and under natural processes, regardless of its age."¹⁹ Even if the government of British Columbia does downplay the importance of primary forests, this does not exonerate companies logging primary forests there; rather, this shows that companies like Drax are operating in a space where companies have enormous leeway to degrade forests. For example, investigations have highlighted that companies logging for biomass in British Columbia are able to avoid key

provincial logging limits through a government program which forestry experts have called a "secretive, fraudulent Ponzi scheme."²⁰ Extending U.K. subsidies that incentivize these operations will further allow companies to log threatened forests for biomass without adequate forest safeguards.

Mischaracterizing forest biomass as carbon neutral and sustainable and spending billions of taxpayer pounds on expanding this industry will take the U.K. backward in efforts to reduce the county's climate emissions and support the preservation of biodiversity. We urge you to:

- End subsidies for forest-based bioenergy (both new contracts and extensions of current policies), including future subsidies for BECCS;
- Reverse the U.K.'s plan to incentivize increased volumes of wood pellets as a means to meet net zero commitments;
- Stop publicly characterizing the burning of wood pellets in power plants as a climate solution or carbon neutral, claims which run contrary to scientific evidence;
- Position the U.K. as a champion of collaborative, international efforts that safeguard the world's remaining primary and old-growth forests as critical carbon stores.

The U.K. could be a global leader in advancing low carbon energy solutions that are truly paradigm shifting and help tackle the climate crisis. Burning forests in power plants is not this solution.

Sincerely,

Akaash Maharaj	
Policy Director	Beatrice Olivastri
Nature Canada	Chief Executive Officer
	Friends of the Earth Canada
Ann McAllister	
Chair	Bob Bancroft
Coalition for Responsible Energy	President
Development in New Brunswick	Nature Nova Scotia
Anthony Swift	Caroline Schultz
Senior Director, Global Northern Forests	Executive Director
Natural Resources Defense Council	Ontario Nature

Charlotte Dawe Conservation and Policy Campaigner Wilderness Committee

Debborah Donnelly Executive Director Alberta Wilderness Association

Eddie Petryshen Conservation Specialist Wildsight

Greg Knox Executive Director SkeenaWild Conservation Trust

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Michelle Connolly Director Conservation North

Montana Burgess Executive Director Neighbours United

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Raymond Plourde Senior Wilderness Coordinator Ecology Action Centre

Richard Robertson Forest Campaigner Stand.earth

CC:

The Hon. Bruce Ralston	The Hon. Todd Loewen
Minister of Forests	Minister of Forestry and Parks
Government of British Columbia	Government of Alberta
The Hon. Graydon Smith	The Hon. Tory Rushton
Minister of Natural Resources and Forestry	Minister of Natural Resources and
Government of Ontario	Renewables
	Government of Nova Scotia
The Hon. Maïté Blanchette Vézina	
Minister of Natural Resources and Forests	The Hon. Jonathan Wilkinson
Government of Québec	Minister of Energy and Natural Resources
	Government of Canada
The Hon. Mike Holland	
Minister of Natural Resources and Energy	The Hon. Steven Guilbeault
Development	Minister of Environment and Climate
Government of New Brunswick	Change
	Government of Canada

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