



Planbureau voor de Leefomgeving

AVAILABILITY AND APPLICATIONS OF SUSTAINABLE BIOMASS

Report on a search for shared facts and views

Policy Brief

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PBL

Colophon

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PBL Netherlands Environmental Assessment Agency is the national institute for strategic policy analysis in the fields of the environment, nature and spatial planning. PBL contributes to improving the quality of political and administrative decision-making by conducting outlook studies, analyses and evaluations in which an integrated approach is considered paramount. Policy relevance is the prime concern in all of PBL's studies. PBL conducts solicited and unsolicited research that is both independent and scientifically sound.

Foreword

The use of biomass to enhance the sustainability of the energy supply and the production industry has given rise to sometimes heated debate. On the one hand, it is widely believed that the quantities of oil, coal and gas that we have been using over the past 150 years as the basis for our economy and prosperity, cannot be replaced without resorting to biological raw materials. According to this view, it is not possible to achieve the objective of the Paris Climate Agreement towards 2050 without biomass. Biomass, which today is already widely used, is seen as attractive because its applications come with a considerably shorter carbon cycle than those of fossil fuels, which have taken millions of years to form. The carbon dioxide emitted by biomass can be offset with new trees and plants. After all, these in turn extract CO₂ from the atmosphere. In addition, emitted CO₂ can be captured or used, which means it is removed from the atmosphere, in a *negative emissions* process.

On the other hand, in other, equally wide circles, the fear exists that the increasing industrial use of organic raw materials, combined with the growing demand for food, will inevitably lead to an even fiercer onslaught on nature. Sustainable use of *natural residual flows* will prove to be hardly possible. It is feared that further subsidised marketing of biomass will lead to growing industrialisation not only of forestry and felling, but also of agriculture, resulting in even more deterioration of biodiversity. The pressure on biodiversity has already reached grossly irresponsible levels, with all the consequences this entails, even with regard to the food supply. Moreover, biomass has other disadvantages, related to issues such as low energy value and air pollution.

We are facing one of today's pressing sustainability dilemmas. Where should the priority lie? In the conservation and enhancement of global biodiversity or in the global reduction of greenhouse gases?

The complexity of the search for the answer matches the clarity of the initial framing of the question. This is due to a multitude of factors: uncertain knowledge, differing assessments of the environmental effects of sustainability programmes that have already been started up, varying levels of confidence in monitoring systems, varying scientific perspectives, varying values and interests. And these points are in reference to only two of the five different perspectives on the use of biomass that are distinguished in this study.

The multi-faceted complexity means it is impossible to make an unambiguous scientific judgement. Although points of view can certainly be weighed following a scientific method, science cannot be the ultimate referee. The facts do not speak for themselves, at least not sufficiently. This study is intended to serve as a foundation for the production of an SER advisory report on an integrated sustainability framework for the sourcing and application of biomass. For the reason set out above, a *remote* approach has been chosen for the study. In a joint effort with the parties involved, an inventory has been made of the arguments, underlying facts and underlying perspectives. What does this landscape of arguments look like? What things do people agree on? What do they not agree on? What does this imply for the sustainability framework that will ultimately be given shape? What choices will have to be

made in the framework, in order to find a way out of the labyrinth of questions and dilemmas, a way out that is effective, and also flexible, because it *learns* during the process.

I would like to thank the large number of people and organisations who have shared their knowledge and insights with us over the course of this intensive process. Without doubt, not everyone will be satisfied with the results, precisely because of the choice to apply a *remote* method in the study. Nevertheless, some 150 stakeholders were willing to share their understanding and thoughts with us. Without their contribution, it would have been impossible to carry out this study. I am convinced that it has served to provide an enormously useful basis for the development of a sustainability framework for biomass.

Hans Mommaas

Director-General of PBL Netherlands Environmental Assessment Agency

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Summary

The Dutch cabinet is convinced that biomass has a prominent role to play in a climate-neutral, circular economy. Biomass must, nonetheless, meet clear-cut sustainability criteria that can rely on broad support. To that end, the government aims to formulate an integrated sustainability framework for biomass. The Ministry of Infrastructure and Water Management requested advice from the Social and Economic Council of the Netherlands on support for and the applicability of such a framework. In addition, PBL Netherlands Environmental Assessment Agency was asked to provide input in the form of a valuation of current and future availability, and of the optimal applications of sustainable biomass for the Netherlands. Since the debate on biomass is deeply polarised, a joint fact-finding effort was also carried out, which a broad group of 150 Dutch stakeholders contributed to. It has become clear that availability and applications of sustainable biomass cannot be determined on purely scientific grounds, and ultimately depend greatly on the broader perspective that is taken.

Aim of the report

This report has three objectives: 1) to provide an overview of the current and future (up to 2050) availability and applications of sustainable biomass; 2) to provide an overview of the various views on the matter; and 3) to validate the arguments that have been offered on the basis of literature, and produce a resulting series of conclusions and points of attention for the sustainability framework mentioned above. For the first two objectives, PBL Netherlands Environmental Assessment Agency sought support from the research agencies CE Delft (for the first overview) and De Gemeent/MSG Sustainable Strategies (to take charge of the joint fact-finding process). This has resulted in the production of two background reports.

Delimitation

In consultation with the Ministry of Infrastructure and Water Management, the study was narrowed to the production and application of biomass for materials, energy and fuels, use in agriculture as a soil improver, and as a raw material for the chemical industry. It was considered too ambitious for the time frame available to also seek to formulate a sustainability framework for the entire food and animal feed sector. This does not retract from the fact that this is an essential further step, particularly because the food and feed flows at national, European and global scales are far greater than those of biomass for materials, the chemical industry and applications in the field of energy.

Joint fact-finding

Opinions in society vary widely on the subject of biomass. PBL Netherlands Environmental Assessment Agency therefore chose to include views from different domains (science, government, industry, NGOs) in the deliberations by carrying out a joint fact-finding effort, which more than 150 Dutch stakeholders participated in. For this purpose, an online survey was carried out, three meetings were convened and thirty-four interviews were conducted. With regard to ten important topics — including climate, air quality, land use, and social, economic and natural aspects in areas where biomass is sourced — those activities formed the basis for an inventory and a representation in an argument map of the views and underlying arguments, which at times were rather differing. The map contrasts views and arguments which look upon the use of biomass as an opportunity or, conversely, as a risk for the specified topics. Biodiversity is not distinguished as a separate subject in the argument map, but plays an important role within several topics.

Points of agreement

The argument map might give the impression that the only opinions and arguments put forward in the biomass debate are flatly for or against the use of biomass, particularly regarding its use as a source of energy. But there are without doubt also points of agreement. For example, stakeholders do not question the climate targets and agree that issues around

land use and soils are to be dealt with carefully. They also envisage an ongoing role for biomass as a material (paper, cardboard, sawnwood for the building industry, and as a substitute for concrete and steel) and as a raw material for the chemical industry. If use of biomass as a source of energy is unavoidable in order to comply with sustainable energy and climate targets, this should preferably take place in fields such as aviation and maritime shipping, where few alternatives, if any, are available at present. Direct burning of primary biomass is one of the least preferred options. Confidence that biomass is sustainable is greatest when it is sourced from the Netherlands; and confidence is greater when biomass is sourced from Europe than when it comes from other parts of the world. In addition, all stakeholders underwrite the importance of taking into account ecological, social and economic sustainability aspects in sourcing areas. And finally, there is a high level of agreement that wood can and may be harvested under certain conditions. According to proponents, important climate benefits are obtained by initially applying long-term storage of biogenic carbon and avoiding the use of fossil raw materials.

Demand for and availability of biomass

According to research carried out by CE Delft, agriculture has greater potential for sustainable biomass than forestry. However, the (scientific) literature reports a wide range of potentials, because the estimates depend greatly on the underlying assumptions. Cases in point are the productivity of agriculture and forestry, the available acreage, policies in the countries where biomass is sourced, the amount of residual material that must be left behind on agricultural and forestry land, the degree of use of degraded and marginal land for biomass cultivation and the availability of water. The perspective on which stakeholders base their reasoning largely determines which choices or assumptions are acceptable to them and which are not, and, by extension, whether they consider lower or higher estimates of potential to be plausible. To gain more insight into how the Dutch demand for biomass compares to availability at the global and European levels, CE Delft related the two matters to five perspectives extracted from the joint fact-finding process. These perspectives focus primarily on climate, renewable energy with minimal use of biomass, renewable raw materials, ecology and sustainable development, and they formed the basis for assumptions about the view on the admissibility of biomass extraction from certain sources or biomass import from certain regions. This then served to make estimates of the amount of biomass available according to each perspective. In addition, assumptions were made for each perspective regarding biomass applications that are considered permissible and the resulting demand for biomass in the Netherlands. Depending on the perspective taken, the country's biomass requirement as a share of overall availability in 2050 varies from 0.6% worldwide to 6.5% of EU availability in cases where the perspective only deems import from the EU as permissible. None of the perspectives foresees the Netherlands to be able to satisfy its own needs.

Validation of arguments

The arguments put forward for each subject were verified against more than 400 (scientific) studies and reports, some brought into the joint fact-finding process by stakeholders and others stemming from the authors' literature research. Below is a summary of the most salient conclusions.

- While it is not possible to give hard figures for the payback time (the amount of time it takes for biomass to produce net CO₂ reduction), restrictions may be placed on those biomass flows that have a high risk of coming with long payback periods.
- Forestry, forest management and forest protection can be improved while taking into account the multifunctional character of forests.
- Possible abusive practices in the wood pellet industry need to be investigated and, if found to actually occur, be combated.
- The European Union should look into possibilities to use marginal or abandoned farmland for biomass cultivation, agriculture, nature or combinations of these activities.

- There is broad support for the application of cascading — the use of biomass in a manner that is as high-grade, optimal and efficient as possible. However, many possible interpretations exist and the Dutch government has been advised to opt for a clear principle.
- Old biomass stoves and boilers generate more, or even far more, atmospheric pollution than newer models. Replacing old devices can lead to substantial improvements in air quality.
- Legislation aimed at sustainability issues must be drafted while securing the balance between making it fraud-proof and making it practicable.
- The possible applications of biomass in the Netherlands in relation to biomass availability at the global or EU level (0.6% to 6.5%) are generally higher than the country's *fair share* — the claim that it could make on the amount of sustainable biomass according to many suggested distribution keys, such as the country's population or gross domestic product as a proportion of the corresponding global total. But these kinds of figures can only be the start of the debate, and cannot serve as a basis for import restrictions. It seems more important to strive for *fair trade* in a more general sense.

Points of attention for the sustainability framework

The wide ranges in both the future availability of, and the future demand for sustainable biomass are largely the result of the varying perceptions of the five perspectives, and pose a challenge to the design of the integrated sustainability framework for biomass that the Dutch government is aiming to establish. To conclude, below we specify a number of important points of attention for the sustainability framework, based on the joint fact-finding effort, the study by CE Delft and the conclusions drawn by PBL Netherlands Environmental Assessment Agency.

- It would seem a risky strategy for the government to go for a climate-neutral circular economy that does not assign a significant role to biomass. However, loss of biodiversity caused by the use of biomass is a concrete risk. It is therefore critical that the consequences of increasing biomass use are closely monitored and that policies carefully consider the trade-off between climate change mitigation and biodiversity loss. Healthy, fertile soils with sufficient organic matter and the prevention of direct and indirect land use change (ILUC) are also crucial aspects and must be safeguarded in accordance with EU legislation.
- It is advisable to direct efforts towards development of both production of sustainable biomass and production of liquid or gaseous hydrocarbons with the use of sustainable electricity.
- It may be possible to increase the chances of the government's choices being accepted and supported by ensuring that the stakeholders and experts who were involved in the project continue to be engaged in a joint effort towards drawing up a development agenda, and in the execution of the corresponding programme. It is recommended that the development agenda also focus on robust, industrial-scale techniques for biomass conversion and separation that are able to transform several types of biomass into an intermediate product, and then convert that further into a range of final products.
- Air quality and effects on public health should be worked into a sustainability framework given that various stakeholders have shown a high level of concern about these issues.
- It is not clear to what degree it is legally possible for the Netherlands to impose requirements on imported biomass that are stricter than those applied by the European Union. Therefore, the debate on whether to maintain or further tighten legislation will have to continue to take place at the European level too.

Findings

Motivation for the report

The Dutch Climate Agreement aims to reduce greenhouse gas emissions by 49% in 2030 compared to 1990 levels. It includes an observation by the government that it is convinced that the use of sustainable¹ biomass is a prerequisite for making the Dutch economy sustainable today, and on to 2030 and 2050. To this end, the government aims to draw up an integral sustainability framework that can, in principle, be used to deal with all types of biomass and all its applications. The Ministry of Infrastructure and Water Management asked The Social and Economic Council of the Netherlands (SER) to give advice on support for and the applicability of such a framework with regard to the origin and uses of biomass. The Ministry requested PBL Netherlands Environmental Assessment Agency (PBL) to provide input for the SER advisory report in the form of research on, firstly, the maximum amount of the various biomass flows that can be allocated to the Netherlands, taking into account several interpretations of the fair-share principle, and, secondly, the possible application of the various biomass flows, assuming that the available biomass is used in the most optimal and efficient way as possible (cascading). PBL commissioned the research and consultancy organisation CE Delft to conduct both sub-studies. This resulted in a technical background report (see CE Delft, 2020), which has served as an important source of information for this report.

PBL believes that the two sub-studies are of value only if they take into consideration, from the outset, the deeply polarised debate about the possible role of different forms of biomass in the energy transition and a circular (bio)economy. For this reason, the decision was made to include views from various domains (science, government, industry, NGOs) in the deliberations, and a joint fact-finding exercise was launched parallel to the CE Delft study, while also providing input for it. The process was supervised by De Gemeeynt and MSG Sustainable Strategies, and over 150 Dutch stakeholders took part in it. The aim was not to reach consensus, but to gain insight into the views, opinions, arguments and dilemmas of various stakeholders with regard to their understanding of *sustainable* biomass in the broadest sense of the word. Another objective was to explore the possible implications, according to the stakeholders themselves, of their views for the availability and applications of biomass. This research has also been documented in a background report (De Gemeeynt & MSG Strategies, 2020).

Report objectives

This report has three objectives. Firstly, given the different interpretations of the term *sustainable*, it aims to provide an overview of the maximum availability and application possibilities of sustainable biomass, based on the technical background report by CE Delft (CE Delft, 2020). Secondly, to provide an overview of the views, opinions, arguments and dilemmas that were put forward by the more than 150 stakeholders in the joint fact-finding process. Thirdly, to attempt to verify the mapped arguments against the combined insights from the reports by CE Delft and De Gemeeynt/MSG Sustainable Strategies and the more than 400 studies brought into the process by stakeholders and the project team. On the basis of

¹ The term *sustainable biomass* is used very frequently, but, as will become clear in this report, the interpretation of *sustainable* is not unambiguous, not even in the domain of science.

these three elements, PBL has defined a number of points of attention that can serve as input for the SER advisory report and the integrated sustainability framework.

With that, this report provides a summary of the present state of knowledge and an overview of the diverse range of perspectives on sustainable biomass. The authors do not, of course, claim to be completely 'perspectiveless' themselves, and therefore the aim was to provide an overview as broad and neutral as possible of the various mindsets in the debate. No choice was made to adhere to one or several of the perspectives, and no attempts were made to develop a personal vision of the arguments and dilemmas that have been put forward. In the path that is to be taken after the SER advisory report is published, PBL can contribute to the further structuring of the sustainability framework, taking into account the main policy lines to be formulated at that particular moment.

Delimitation

The Dutch Climate Agreement states that the integrated sustainability framework should cover all types of biomass and all its applications. In consultation with the Ministry of Infrastructure and Water Management, the study was limited to the production and application of biomass for materials (paper, wood, chipboard, reed, flax, hemp), raw materials (feedstock), the chemical industry, energy and fuels, and for use in agriculture as a soil improver. At present, this is thought of as a crucial first step. Given the available time frame, it was considered too ambitious to also seek to formulate a sustainability framework for the entire food and animal feed sector. This does not retract from the fact that that is an essential further step, particularly because the food and feed flows at national, European and global scales are far greater than those of biomass for materials, the chemical industry and applications in the field of energy. In 2012, for example, of all imported and locally produced agricultural products in the Netherlands, only 5.5% in terms of weight was converted into biofuels — mainly bioethanol which was used primarily for export (Goh & Junginger, 2013). The study does, however, take into account that food and feed lay a large claim on the total extent of agricultural land and that the land in question is not available for producing biomass for other purposes. Therefore, to determine the availability of production flows from agriculture, this report only uses studies and figures that apply the 'food, feed and fibre first' principle, which gives priority to meeting the global population's need for food and clothing.

In the exploration of the aspect of availability, the study differentiates between the sourcing areas of the Netherlands, the European Union² and the rest of the planet, between the agriculture and forestry sectors and also between production flows (the main products that agriculture and forestry focus on). A distinction is also made between primary, secondary and tertiary residual flows³, which correspond to, respectively, materials released in the field during the production process, such as the parts of plants and trees that are left on the land after harvesting; materials released during the processing of the production flow, such as sawdust and sugar beet pulp; materials that remain after use or consumption of a product, such as waste wood and vegetable, fruit and garden waste.

Finally, it is important to note that in establishing the biomass requirements of the selected sectors, both the stakeholder process and the CE Delft study addressed only in a limited way the question of how large the contribution of biomass to those sectors would need to be at various points in time, from the point of view of an optimal transition to a climate-neutral circular economy in 2050.

² This refers to the EU *including* Great Britain, i.e. the former EU-28.

³ Instead of *residual flow*, the term *side flow* is also used since the former suggests that it does not or cannot have a function.

Findings of the joint fact-finding process

Selection of stakeholders

The fact-finding process was open to all persons who wished to make a substantive contribution to the debate on sustainable biomass by bringing in their knowledge of biomass availability and possible applications, or their knowledge of sustainability aspects. The choice for an inclusive approach was weighed against a more exclusive approach involving a prior selection of experts only, on the basis of their knowledge and independence. While an exclusive approach may more rapidly lead to a clear assessment, it is susceptible to criticism of the choice of experts. Critics could, for example, allege that certain parties, such as interest groups, climate scientists or policy makers, are disproportionately represented.

Drawing on its own knowledge of the Dutch network and a brief online exploration, the project team compiled an initial list of stakeholders. In addition, the PBL website publicly announced the research and through surveys and interviews the participating parties were asked for their opinion on who else should be involved. This resulted in a list of 247 informed stakeholders, of which 151 made active contributions to the process. They all held positions in governments, trade organisations, knowledge organisations, consultancy agencies, NGOs, regional management bodies, and certification or standards bodies. One stakeholder did not agree with the methods being followed and therefore pulled out of the process.

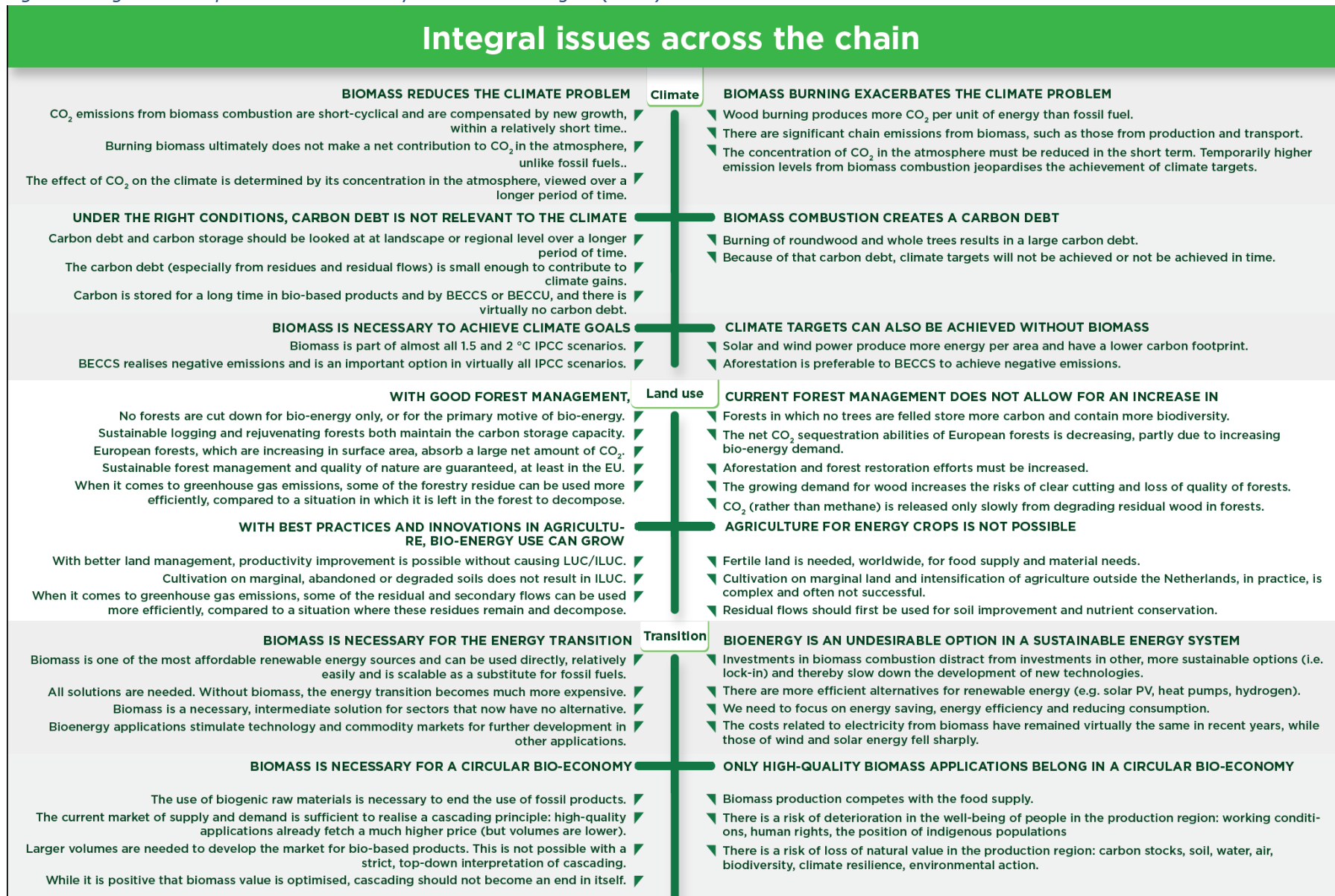
Survey, interviews and meetings

At the beginning of the joint fact-finding process, a survey was sent out to the stakeholders with the aim of obtaining input for the quantitative examination of availability and applications for biomass in the Netherlands, and of forming a clearer impression of various points of view in the biomass debate. The survey was completed by a diverse group of 97 respondents. In addition, 34 in-depth interviews were held with representatives of various organisations and with different areas of expertise, and three stakeholder meetings were convened to enable the participants to put forward and discuss their views and arguments, both orally and through a digital presentation application. The stakeholder process was of a strictly consultative nature, and no substantive conclusions have been drawn from it. Throughout the process, the presented arguments and reflections were considered to all be of the same importance, and in the reporting, they were not weighted and not linked to the individual or the organisation that presented them.

Argument map

De Gemeent/MSG Sustainable Strategies employed the surveys, interviews and meetings, and also a news scan, to make an inventory of the various views and underlying arguments with regard to ten topics, and then drew up an argument map jointly with PBL (see Figure 1). The ten topics are climate, land use, energy transition (including cascading), the 'people planet profit' principle, the economy, air quality, certification, carbon accounting, policy development and the 'fair share' concept — that is to say, how strong the claim is that the Netherlands is allowed to lay to the overall global and European amounts of sustainable biomass. The left-hand side of the argument map shows views and arguments that primarily look upon biomass as an opportunity towards achieving a circular (bio)economy. The right-hand side lists those arguments which largely emphasise the risks of undesirable effects. Biodiversity, and more particularly, the possible loss of biodiversity as a result of large-scale biomass production, has not been included as an individual topic in the argument map, but is treated as an overarching subject that is explicitly and implicitly present in several topics and the corresponding arguments. Biodiversity is also the basis for one of the five identified stakeholder perspectives; this is further discussed in the *Five perspectives* section below.

Figure 1. Argument map. Source: De Gemeynt & MSG Strategies (2020).



Production in the region of origin

BIOMASS PRODUCTION CAN GO HAND IN HAND WITH IMPROVEMENTS FOR PEOPLE AND NATURE

An increasing demand for biomass can be a boost for sustainable production. Biomass production provides employment and income. It is possible to improve both human well-being and nature by applying best practices in agriculture and forestry.

People Planet Profit

BIOMASS PRODUCTION CAN HAVE NEGATIVE EFFECTS ON PEOPLE AND NATURE

- ▶ Biomass production competes with the food supply.
- ▶ There is a risk of deterioration in the well-being of people in the production region: working conditions, human rights, the position of indigenous populations
- ▶ There is a risk of loss of natural value in the production region: carbon stocks, soil, water, air, biodiversity, climate resilience, environmental action.

Application in the Netherlands

BIOMASS STRENGTHENS THE DUTCH ECONOMY

The biomass market offers economic opportunities for rural areas and agri-business. Biomass (i.e. residues) for non-food applications provides new market opportunities. The use of biomass makes the economy less dependent on fossil fuels.

Economy

CURRENT USE OF BIOMASS INHIBITS INNOVATION

- ▶ Burning wood as biomass does not lead to innovation. Billions of euros in SDE subsidies for biomass co-firing, heating and biomass boilers inhibit innovations in 'real' sustainable solutions.
- ▶ The large-scale use of biomass for combustion and other applications creates a lasting import dependence.

BIOMASS COMBUSTION CAUSES LITTLE DETERIORATION IN AIR QUALITY

Modern biomass plants for the generation of heat or electricity have good flue gas cleaning and hardly increase particulate matter concentrations. Particulate matter emitted from modern biomass plants consists mainly of salts and is hardly toxic. Modern biomass plants have relatively low nitrogen emission levels. Emissions remain within legal norms, which are also becoming increasingly strict. Unregulated private fireplaces and old stoves have a much greater impact on air quality than modern large-scale biomass installations.

Air

BIOMASS COMBUSTION CAUSES AIR POLLUTION

- ▶ The increasing number of biomass energy plants is exacerbating air pollution.
- ▶ Biomass combustion leads to higher NOx emission levels, while these need to be reduced.
- ▶ There is no safe threshold for particulate matter, which means that any increase in its concentration leads to adverse health effects.
- ▶ Biomass plants are reducing the benefits of measures in other areas.
- ▶ The health effects of large-scale biomass combustion are not yet known.

Trust in implementation

STRICT SUSTAINABILITY PRINCIPLES AND CRITERIA ARE APPLIED

A large part of the biomass for non-food applications complies with stringent requirements and is closely monitored. Sustainability requirements for biomass are a good thing, but should also apply to food, feed and textiles. Criteria that guarantee full sustainability become impractical

Certification

CERTIFICATION IS A PAPER TIGER

- ▶ Regulations are complex and prone to fraud and are very difficult to enforce outside the EU.
- ▶ The increasing demand for biomass leads to perverse incentives and elicits fraud.

CARBON ACCOUNTING IS WATERTIGHT AND PREVENTS DOUBLE COUNTING.

All countries submit reports to the UN about the CO₂ that is captured by growing forests and in soils and the CO₂ that is emitted due to harvesting. Sustainability criteria ensure that no biomass is imported from forests where carbon stocks are declining.

Carbon accounting

CURRENT FRAMEWORKS DO NOT PROVIDE SUFFICIENT CERTAINTY ON CO₂ REDUCTION

- ▶ In international carbon accounting, emissions are registered with the biomass producer and emissions from combustion count as zero. This creates a distorted picture for national objectives.
- ▶ CO₂ registration in countries of origin is failing, underestimating the total amount of emissions.

ENERGY AND CLIMATE POLICY MAY POSITIVELY AFFECT THE APPLICATION OF BIOMASS

The SDE+ is a subsidy tool that focuses on cost-effectiveness. Government can use the SDE+ to influence the type of biomass application. In this way, no new SDE subsidies for co-firing will be awarded. EU legislation (e.g. REDII) provides many certainties for sustainable production and application.

Policy

CURRENT FRAMEWORKS HAMPER HIGH-QUALITY USE OF BIOMASS IN THE ENERGY AND RAW MATERIALS TRANSITION

- ▶ The main focus in policy objectives is on emissions from chimneys (scope 1). This does not sufficiently stimulate a reduction in embedded carbon (scope 3).
- ▶ The SDE+ stimulates low-grade energy use of biomass.
- ▶ Incentives, such as SDE+, should be more geared towards innovation and higher quality application.

FAIR TRADE IS IMPORTANT, BUT FAIR SHARE IS NOT A WORKABLE PRINCIPLE

The Netherlands is a trading country with a large amount of imports and exports and industries that produce for the global market. This does not combine well with fair share at national level. There is no neutral basis for determining fair share and implementation is difficult if not impossible.

Fair share

CURRENT FRAMEWORKS DO NOT PROVIDE SUFFICIENT CERTAINTY ON FAIR TRADE

- ▶ The Netherlands must not deprive other countries of their transition potential by importing biomass from these countries.
- ▶ The Netherlands should import no more biomass than their fair share of the global potential.

From joint fact-finding to perspectives on biomass

Over the course of the fact-finding process, the emphasis moved more and more from a search for facts to the identification of underlying perspectives on biomass. It turned out that facts were not the only source of disagreement, and probably not even the most important one. The debate revolves mainly around what those facts might mean in the light of a variety of perspectives, worldviews and interests. These notions are a reflection of the diverging beliefs, assumptions and valuations that exist with regard to societal goals between which trade-offs are made: economic development and volume growth, climate goals, biodiversity conservation, soil management, food production, use of materials and rate of transition and opportunities for change in various sectors. These diverging beliefs determine the biomass debate to great measure, but the differences cannot be reconciled through debate by and of itself and by gathering more knowledge and more facts. Ultimately, what is required is political decisions that are underpinned not only by scientific knowledge but also by social considerations. For this reason, the fact-finding process design created by De Gemeynt/MSG Sustainable Strategies was primarily geared towards accommodating all the possible arguments and concerns that exist among the stakeholders, and not meant to achieve consensus on all points.

Points of agreement

The argument map might give the impression that the only opinions and arguments put forward in the biomass debate are flatly for or against the use of biomass, particularly with regard to its use as a source of energy. Of course, other opinions and arguments were also presented which fall between the extremes and on which stakeholders even concurred to a greater or lesser degree. These (more general) points of agreement are summed up below:

- The climate targets at the national, European and global levels are not open to question.
- The risks of indirect land use change (ILUC) and high carbon debt must be minimised.
- There is a high level of agreement that wood can and may be harvested under certain conditions. For example, there appears to be agreement on the idea that tertiary residual flows (material released after the service life of a product) pose low climate risks. The same applies to some primary and secondary residual flows (material released during production in the field or in the forest; material released during processing).
- The presence of healthy and fertile soil with sufficient organic matter is crucial and must be safeguarded.
- Stakeholders envisage an ongoing role for biomass as a material (sawnwood, paper, cardboard, and as a substitute for concrete and steel) and as feedstock for the chemical industry.
- If use of biomass as a source of energy is unavoidable in order to comply with sustainable energy and climate targets, this should preferably take place in fields such as aviation and maritime shipping, where few alternatives, if any, are available at present.
- All stakeholders subscribe to the principle of cascading: the use of biomass in a manner that is as high-grade, optimal and efficient as possible. In this regard, direct burning of primary biomass is one of the least preferred options. Stakeholders agree that important climate benefits are obtained by initially applying long-term storage of biogenic⁴ carbon in materials and products and avoiding use of fossil raw materials.
- All stakeholders underwrite the importance of the sustainability aspects of well-being, nature, biodiversity and prosperity, but there are differences of opinion regarding the degree to which it is possible to ensure the safeguarding of the food supply, the protection of human rights and the conservation of biodiversity.

⁴ Carbon stored by living organisms such as plants, trees and algae.

- A transition to a biobased economy may act as an impulse for the economy.
- The present-day promotion of biomass use through the SDE+ scheme is unbalanced, focusing heavily on energy applications and short-term cost-efficiency rather than on more high-value applications (such as materials and the chemical industry) and the longer term.
- Confidence in the sustainability of biomass is greatest when it is sourced from the Netherlands, because policies are thought to have the greatest impact at the national level. For the same reason, confidence is greater when biomass is sourced from the European Union than when it comes from other parts of the world, though attitudes may differ when considering specific countries.

From the argument map and the points of agreement, a picture is obtained that shows that stakeholders really do agree on the usefulness and the need for the goals that predominate in each topic. But they have different answers to questions of whether biomass should play a role in achieving those goals. How prominent a role should that be? What sustainability criteria should it meet? Where should that sustainable biomass be sourced from?

Five perspectives

During the joint fact-finding process, it became clear that stakeholders cannot be grouped invariably, for all topics, onto the left or right side of the argument map when considering points of disagreement. That is, they cannot readily be classified into supporters and opponents. A variety of lines of reasoning emerged, each of which is consistent in itself and supported by pertinent reports and analyses. Each, however, is only partially compatible with other lines of reasoning. The debate that was taking place appeared to deal not so much with what the actual facts would be, but rather with the views and the interpretation of the facts in the light of one's own perspective.

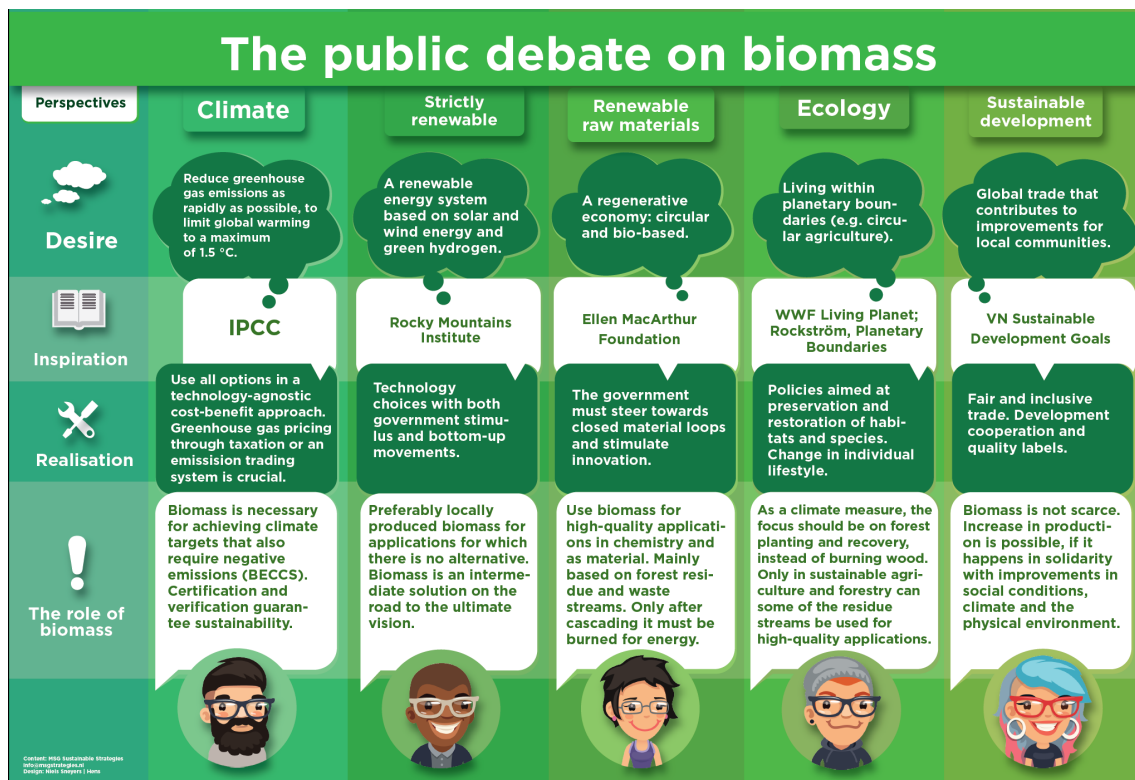
For this reason, De Gemeent and MSG Sustainable Strategies looked for a classification into worldviews or perspectives that are able to explain, if only partially, the different positions in the debate, and that thereby can help to provide better interpretations of the different lines of reasoning. They choose not to do this from a purely scientific angle, and devised their own pragmatic classification based on the survey results in combination with the conversations, meetings and interviews. The lines of reasoning were condensed into five perspectives (see Figure 2) which are labelled as follows:

1. **Climate.** Mainly found among climate scientists, energy scientists, economists, national policy makers, and employees of large energy companies and a number of social organisations dedicated to the environment.
2. **Strictly renewable.** Particularly NGOs that focus on energy issues, regional and local authorities and some energy companies.
3. **Renewable raw materials.** Mainly companies in the chemical industry and waste management companies, policy makers in the field of the environment, actors in the field of agro (science, banks, policy makers).
4. **Ecology.** Especially ecologists and forestry professionals, some area managers and civil society organisations which focus on nature and biodiversity.
5. **Sustainable development.** Mainly stakeholders who are involved in cooperation projects in developing countries.

Each of these perspectives has both an intrinsic (social) main objective, and its own particular representation of the current and aimed-for state of the climate, nature, biodiversity, supply of agricultural and food products, the energy system, and the economy at the local and other levels. Therefore, a perspective does not only encompass a vision of biomass in itself, but also of the broader system in which biomass is regarded usable or not usable in the field of energy and in other applications. While stakeholders may be sensitive to arguments from a number of perspectives, most will see one particular perspective as prevailing. The participants in the joint fact-finding process acknowledged the classification into perspectives and saw it as

productive for a more in-depth and constructive way to discuss disagreements and concordances.

Finally, given that each of the identified perspectives has different views with regard to which sustainability requirements need to be applied, how strictly they need to be applied, and which sourcing areas and applications are permissible, all five also make different assessments of how large the Dutch need for biomass is, and of how much biomass is available. This report makes the first steps towards quantifying those assessments on the basis of the stakeholder perspectives.



Source: De Gemeynt & MSG Strategies (2020).

Figure 2. Characterisation of the perspectives.

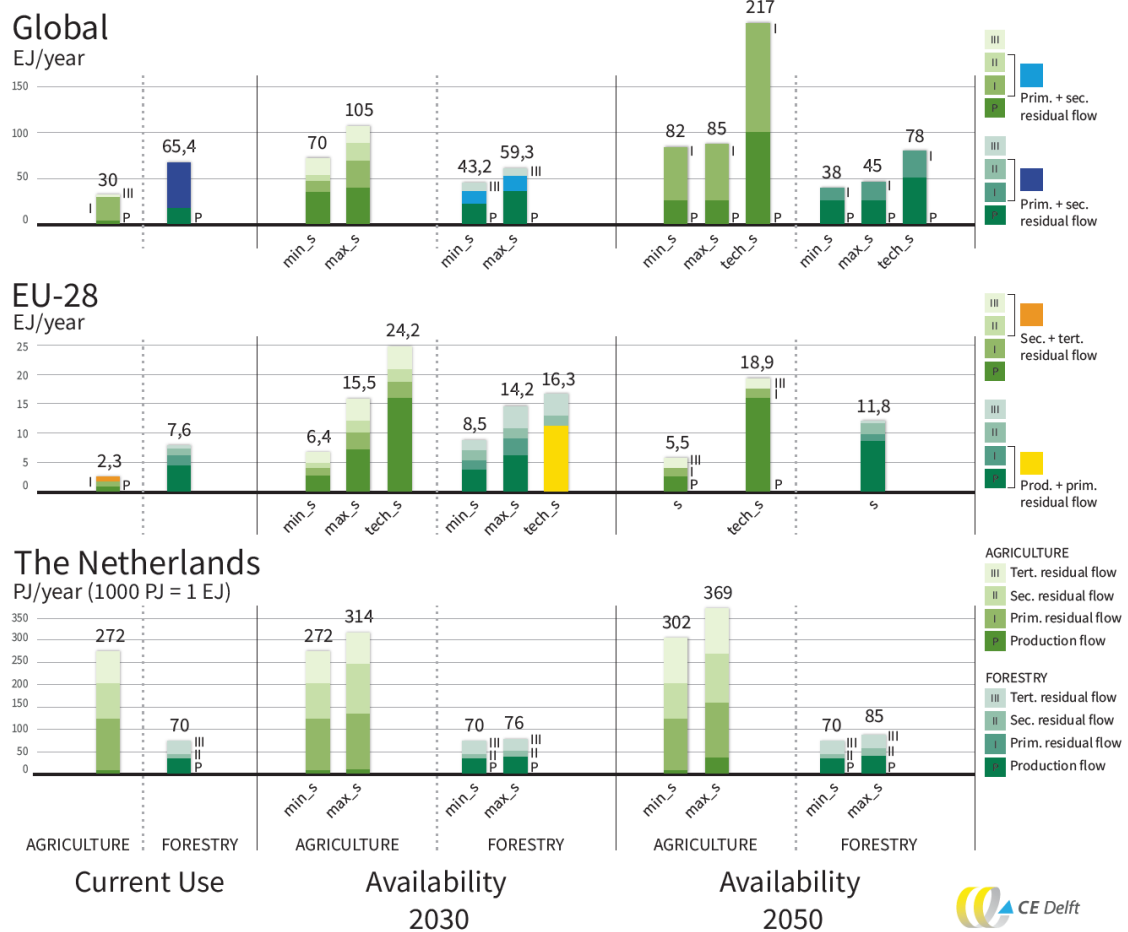
Findings on need for and availability of biomass

Within the framework of this study, CE Delft has mapped out, on the basis of available literature, how large the need for biomass might be in the Netherlands and what the biomass availability might be for the country under different interpretations of sustainability, now and in the future (2030 and 2050). To establish availability, imports have been taken into account. Since forecast estimates inherently contain considerable uncertainties, and different publications use different starting points, CE Delft has presented ranges of values rather than exact figures.

Availability of sustainable biomass

The inventory of biomass availability focuses on the agriculture and forestry sectors in the Netherlands, the European Union and worldwide. It distinguishes between production flows and primary, secondary and tertiary residual flows (see the *Delimitation* section above for details). To establish biomass availability, only those figures have been used on which there is widespread agreement in the literature — that is to say, those figures for which many authors

typify the assumptions made as plausible. As far as possible, a distinction has also been made between *sustainable* and *technically sustainable* biomass potentials. The *sustainable* potential is based on studies that factor in far-reaching ecological sustainability constraints, such as the exclusion of areas suffering water shortages or water stress, areas with a heightened risk of soil degradation and areas with high biodiversity value. The *technically sustainable* potential is based on studies which only take into account basic sustainability requirements, such as giving priority to meeting the global population's need for food and clothing (the 'food, feed and fibre first' principle) and excluding protected areas and original nature.



Source: CE Delft (2020)

Figure 3. Current and future (2030 and 2050) availability of biomass stemming from agricultural and forestry flows for use in energy and material applications worldwide, in the European Union and in the Netherlands. Min_d and max_d are the minimum and maximum sustainable availability; tech_d represents technically sustainable availability. The EU-28 totals for 2050 are lower than those for 2030. This is partly due to the fact that only few studies have quantified availability; there are, for example, no figures for secondary residual flows. The 2030 and 2050 figures for availability in the Netherlands include current use.

Agriculture appears to have the greatest potential for sustainable biomass, both in the European Union and globally (see Figure 3). This concerns volumes from biomass cultivation and residual flows from other crops. The potential from agriculture and forestry in 2030 and 2050 depends highly on the assumptions behind many factors, including agricultural and forestry productivity, acreage available for agriculture (which is greatly conditioned by the proportion of animal products in the human diet), policies in the countries where biomass is sourced, the amount of residual material that needs to be left on agricultural and forestry land

for purposes of soil fertility and biodiversity, the degree of use of degraded and marginal land for biomass cultivation, and water availability. It should be noted that in Figure 3 the representation of future availability in the Netherlands includes current use, in contrast to the data for the EU and the world as a whole. This springs from the idea that better use of existing flows may lead to additional biomass becoming available, for example by taking advantage of crop residues more effectively and through biorefinery⁵. In the period up to 2050, the amount of sustainable biomass in the Netherlands could increase by around 110 petajoules. However, this comes with the observation that there are hardly any recent studies that provide a suitable representation of the future availability of every particular biomass flow in the Netherlands.

Need for biomass

Table 1 lists the sectors and applications that CE Delft included in its mapping of the total Dutch need for biomass. The estimates come mainly from studies that have examined only one single sector, and that usually do not take the needs of other sectors or other countries into account, and therefore also do not take into account the possibility of cascading — using biomass in the most high-grade, optimal and efficient way as possible. Moreover, while most of these studies do not consider possible scarcity of biomass, they do bear in mind the fact that ultimately, biomass is not indefinitely available or obtainable for free. A further limitation of the available studies is that they present virtually no forecasts for 2030 and 2050 with regard to materials. This constitutes a serious gap in the data because the use of biobased matter to replace building material, including concrete and steel, as well as other materials is looked upon as a high-grade — and therefore desirable — measure in a biobased circular economy⁶.

As Table 1 shows, the ranges that CE Delft reported for the Dutch need for biomass (including biomass bunkers) are rather extensive. Further research would be beneficial, particularly with an eye on harmonising the needs for different types of biomass in 2030 on the basis of, among other things, the stipulations in the Dutch Climate Agreement.

Table 1. Biomass requirement in the Netherlands by application. The need for materials has only been worked into the figures to a limited extent, because virtually no estimates exist for 2030 and 2050.

PJ/year	Present	2030 Min.	2030 Max.	2050 Min.	2050 Max.
Feedstock chemical industry	3	3	200	90	368
Mobility and transport	49	62	1,022	164	2,402
Heat demand from industry	24	23	23	-	88
Heat demand from built environment and greenhouse industry	25	-	438	-	911
Electricity generation	50	30	30	-	159
Materials	83	143	143	>143	>143
Application in agriculture	90	90	101	90	101
Total	323	350	1,956	>486	>4,170

Source: (CE Delft, 2020)

Biomass need vs availability within the perspectives

CE Delft looked into the relationship between the Dutch need for biomass and global and EU availability and related this to the five stakeholder perspectives. To this end, the position of each perspective was further specified with regard to seven key biomass issues: use of wood, use of biomass for energy applications, confidence in import of biomass, cultivation of energy crops, use of bioenergy in combination with CO₂ capture and storage (referred to

⁵ This aspect is dealt with in further detail in *Roadmap for National Biofuels (in Dutch)* (Corbey & Asselt, 2020).

⁶ The government aims to scale down the use of abiotic raw materials by 50% by 2030, mainly through a shift towards increased use of secondary and renewable (i.e. biotic) materials (I&W, 2016).

internationally as BECCS), degree to which biomass is considered to be an opportunity or a threat or risk, and proportion of available biomass in Europe and the rest of the world the Netherlands may lay claim to.

CE Delft then turned to the biomass sources, flows and sourcing areas identified in Figure 3 and made estimates of which are acceptable and which are not according to each of the perspectives. Similar estimates were made with regard to the biomass requirements of the applications distinguished in Table 1. According to the *Climate* perspective, for example, the overall global availability of sustainable biomass from agriculture and forestry totals 129 exajoules per year. The yearly requirement of the Netherlands is 1,760 petajoules (1.76 exajoules). This means that, according to that perspective, in 2030, the Netherlands will lay a claim to 1.4% of global biomass availability⁷.

Of course, the choices made by the researchers at CE Delft when linking perspectives to figures on availability and demand are, to a certain extent, arbitrary: in some cases, other choices would have been possible. The point is not so much to obtain exact results, but rather to demonstrate that there can be considerable differences in the figures for availability and demand among the five perspectives. This applies to both absolute quantities and the percentages for Dutch claims on global or EU availability.

Table 2. Availability and Dutch requirements by perspective, for 2030 and 2050; biomass availability in EJ/year; Dutch requirements in PJ/year and as a percentage of availability worldwide and in the EU-28. Availability figures are rounded to whole numbers.

	Climate	Strictly renewable	Ecology	Sustainable development	Renewable raw materials
Import potential	Worldwide	EU-28*	EU-28*	Worldwide	Worldwide
2030					
Availability (EJ/year)	129	24	6	129	129
Dutch requirement (PJ/year)	1,760	360	163	1,760	360
Dutch requirement as % of availability	1.4%	1.5%	2.8%	1.4%	0.3%
2050					
Availability (EJ/year)	245	10	5	105	105
Dutch requirement (PJ/year)	3,970	414	300	3,970	580
Dutch requirement as % of availability	1.6%	4.3%	6.5%	3.8%	0.6%

*The perspectives *Strictly renewable* and *Ecology* allow imports from the EU-28 only.

Source: CE Delft (2020)

Important conclusions to be drawn from this are:

- The Netherlands is not able to satisfy its own future biomass needs under any of the perspectives, and therefore, in all cases, the country needs imports from the European Union or the rest of the world, even to meet the lower limit of its needs.
- None of the perspectives foresees Dutch demand exceeding 6.5% of global or EU availability. This means that it is, in any event, physically possible to import the required amount of biomass. The question of whether it is achievable and desirable to actually import the required quantities is a matter of, among other things, sustainability policies,

⁷ The question of whether this is a large or a small proportion is dealt with in the section *Conclusions and recommendations*, under the heading *fair share*.

biomass prices and perhaps also the interpretation of the fair-share principle. The latter is discussed below in the section *Conclusions and recommendations*.

- The claim made by the Netherlands becomes excessively high (up to 80% of biomass availability in the EU), if the possible maximum level of requirement, such as that from the *Climate* perspective is coupled to the low figures for availability stated in the *Ecology* and *Strictly renewable* perspectives.

Conclusions and recommendations

The most forceful arguments from the argument map have been verified against the literature gathered during the process. This concerns more than 400 (scientific) studies and reports, partly brought in by the stakeholders participating in the joint fact-finding process and partly stemming from the project team's own literature research. The verification effort served as a basis for the formulation of the conclusions listed below. The order in which they appear here corresponds roughly with the order of the topics on the argument map. Since biodiversity was dealt with as an overarching subject, it is discussed here first.

1. Biodiversity loss caused by large-scale production of biomass is a concrete risk; additional measures are necessary which take into account the trade-off between climate change and biodiversity

Biodiversity loss caused by large-scale production of biomass for energy and materials in forestry and agriculture is of deep concern in the biomass debate, especially with regard to direct and indirect land use change and the question of the degree to which biomass production can be compatible with conservation of nature and biodiversity. Accordingly, avoidance of the risk of biodiversity loss forms the basis for the *Ecology* perspective, which is primarily aimed at preserving and restoring habitats and species (see Figure 2).

Despite the current legislation in Europe and countries elsewhere, biodiversity loss caused by large-scale production of biomass for energy and materials is a real risk. Both bottom-up and top-down studies paint widely varying pictures about negative effects, now and in the future, but also about positive effects. First-generation biomass crops (maize, palm oil, soy) in particular have a negative effect on biodiversity, but the impact of second-generation biomass crops (*Miscanthus*, short-rotation plantations, switchgrass) is, according to many studies, neutral or positive if the crops are grown in existing production systems (see Figure 4). Studies which look into forestry also present varying and complex images of effects ranging from positive to negative.

To what extent does biodiversity loss caused by the cultivation of biomass outweigh gains in biodiversity from reduced climate change? The answer to this question is highly dependent on the way biomass is produced and the resulting changes in land use. For example, it is evident that biodiversity loss is considerable, if the expansion of biomass cultivation is carried out in natural ecosystems. On the other hand, intensification of agricultural practices has a potential to free up land for biomass cultivation, which means that biomass does not have to be produced at the expense of natural ecosystems and that biodiversity loss is limited or completely avoided. In addition, there is much uncertainty about the long-term effects of climate change on biodiversity at the global level.

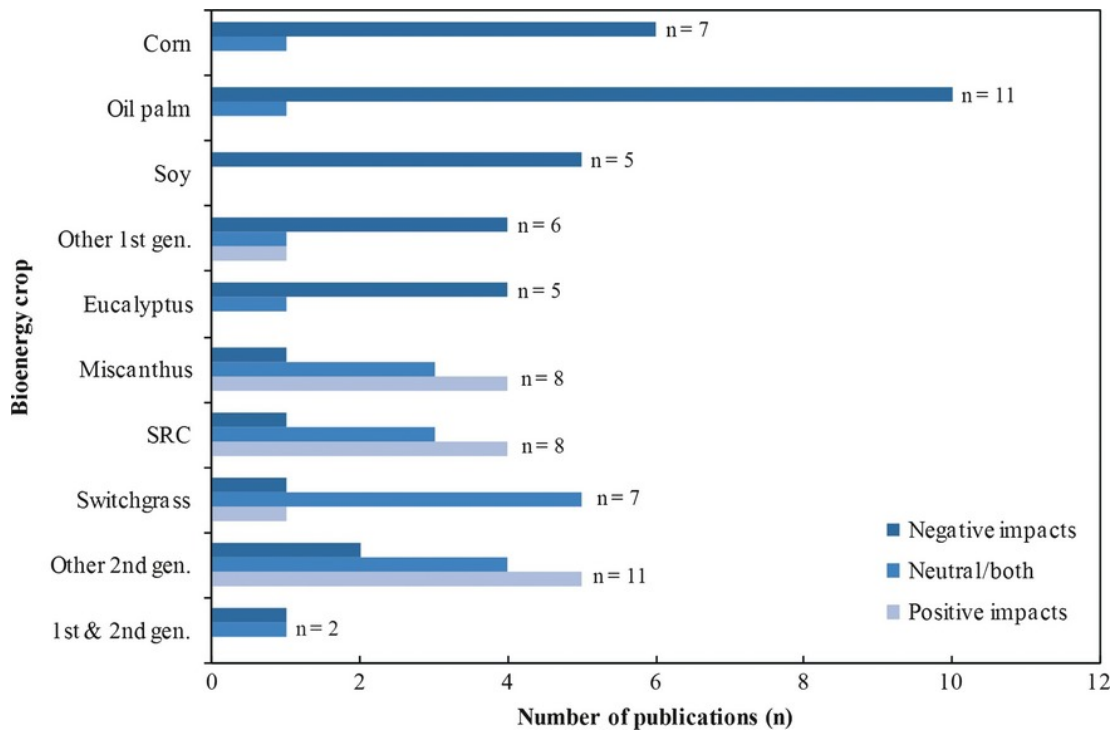


Figure 4. Impact of first- and second-generation biomass crops on biodiversity. Data based on 59 studies. SRC stands for Short Rotation Coppice plantations. Source: (Immerzeel et al., 2014).

Given this complexity, many studies point to the importance of analysing and closely monitoring the effects that expanding biomass production has on biodiversity, as well as to the importance of having policies in place which very carefully consider the balance between climate change mitigation and biodiversity loss⁸. Ultimately, this involves a custom-made effort in which a variety of strategies are important, either combined or by themselves. These may include protection of natural areas or areas with a high restoration potential, promotion of sustainable intensification of agriculture to reduce its spatial footprint, applying agroforestry, setting up track-and-trace systems, and making more optimal use of residual flows in production systems and of marginal and abandoned agricultural land insofar as the land has a relatively low biodiversity value or restoration potential.

2. A significant role for biomass seems to be a prerequisite for a climate-neutral circular economy

A climate-neutral circular economy that does not assign a significant role to biomass is theoretically not impossible. But it does mean that far-reaching assumptions have to be made. These would apply to, for example, the roll-out rate of the most outstanding technologies available, electrification, agricultural yield improvements, reduction of non-CO₂ greenhouse gases, consumption patterns (or more pertinently: fewer animal products), rate of improvements in efficiency and rate of technology development. This acquires even more relevance if aviation, maritime shipping and raw materials for the chemical industry (currently oil) and the building industry also have to become climate-neutral. It would therefore seem a

⁸ This of course also involves social considerations that play a part in policy and can contribute to biodiversity conservation or to the broader goal of bringing about a sustainable society.

risky strategy for the government to work towards a climate-neutral circular economy that gives only a minor role to biomass, or none whatsoever.

3. Translating carbon debt, payback time and carbon parity⁹ into firm policy criteria is almost impossible, but introducing restrictions is feasible

Several definitions exist for the calculation of carbon debt, payback time and carbon parity, all of which are concepts of particular importance for biomass from production forests. These values — and therefore also the amount of CO₂ avoided — can only be calculated properly for a given time period and biomass flow if all parties agree on the definition and all the underlying assumptions, such as *counterfactuals*, i.e. what would have happened in the forest and in energy generation if the biomass had not been harvested and used. However, it is virtually impossible to base policies on a fixed maximum payback period, but it is possible to impose restrictions with regard to, for example, permitted flows for a specific end use. Such restrictions minimise the risk of carbon debt becoming too high or payback periods becoming too long. In this regard, there seems to be agreement on the idea that secondary and tertiary residual flows and part of primary residual flows incur low carbon debts.

4. While solar panels and wind turbines are more efficient than biomass in terms of energy yield per area unit, it is still advisable to put maximum effort into the development of both sustainable biomass production and power-to-liquid, and power-to-hydrogen solutions.

Although solar panels and wind turbines produce more energy per area unit than photosynthesis, electricity cannot be set against biomass, which consists of complex hydrocarbons and can be used for a wide range of purposes. After all, biomass is not only an energy carrier but also a carbon carrier, and as such it is a raw material for the chemical industry and for hydrocarbon-based fuels, such as biodiesel, bioethanol and biokerosene. Power-to-liquid (PtL) applications, in which electricity and CO₂ are used to make synthetic fuels (see Figure 5), have advantages and disadvantages compared to biomass.

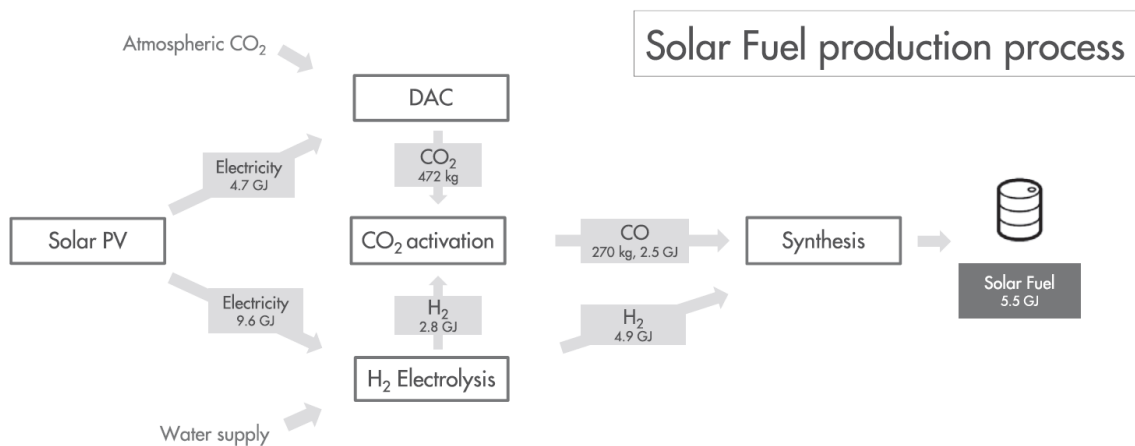


Figure 5. Production process of synthetic fuel using solar energy (Power-to-liquid or PtL). DAC stands for Direct Air Capture. Diagram taken from: (Kraan, Kramer, Haigh, & Laurens, 2019).

One of the advantages is that solar- or wind-based PtL requires less surface area than biokerosene. Disadvantages of PtL, compared to biofuel, are that investment and operating

⁹ Carbon debt refers to the amount of CO₂ released as forest resources are harvested and utilised. Payback time is the time it takes for vegetation to capture the CO₂ emitted minus the CO₂ avoided due to decreased consumption of fossil fuels. Carbon parity occurs at the moment all the CO₂ is captured that would have been captured by the forest had it not been harvested.

costs are still very high and that the technology is not mature yet. It therefore seems wise to put effort into the development of *both* sustainable biomass production *and* sustainable electricity as a basis for the production of liquid or gaseous hydrocarbons. Although still at an experimental stage, a method that could be counted on is *combining* biomass and hydrogen from renewable electricity (power-to-hydrogen or PtG), which may possibly reduce losses occurring during biomass conversion by a factor of 2 to 2.5.

5. An important task is to determine how forest management and forest protection can be improved, and how forestry can be coupled to multiple functions

Although the net global forest cover has decreased only slightly since 1990 (see Figure 6), deforestation of natural forest systems is a major problem in several regions around the world and in some European countries such as Romania. All stakeholders in the biomass debate emphasise that, if the production of woody biomass were to lead to the destruction or degradation of natural forest, this should be deemed inadmissible and, in addition would go against ecological goals, legislation in Europe and elsewhere, and the corresponding certification schemes.

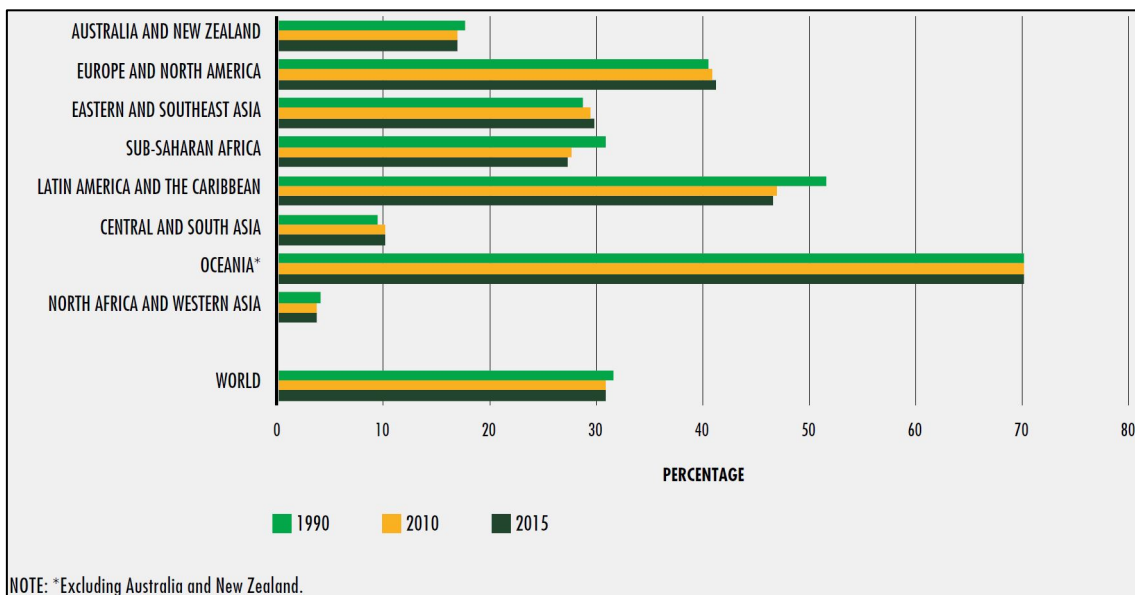


Figure 6. Forest cover as a proportion of total land area in 1990, 2010 and 2015. Source: (FAO, 2018).

However, they then disagree on the degree to which this is actually happening or on the chances of it happening. This is partly because it is not possible to draw a sharp boundary between natural forest and production forest (see Figure 7).

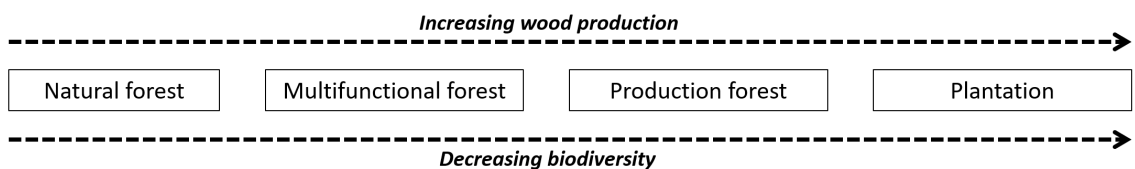


Figure 7. The sliding scale from natural forest to plantation.

A more meaningful approach to the discussion would be to focus on how forests, including those in the Netherlands, can be better managed and, more particularly, protected. That may be achieved by, for example, increasing the protected forest cover where no, or hardly any, forestry activities take place, by engaging in afforestation and reforestation, and by ensuring

that (commercial) forestry in unprotected forests is combined as much as possible with other important functions such as CO₂ sequestration, biodiversity conservation, climate adaptation and recreation (climate-smart forestry). At the same time, any warning signs of the existence of practices that are incompatible with sustainable forest management should be investigated thoroughly and if a warning is found to be relevant, those practices should be prevented because they can severely undermine confidence in sustainable forest management.

6. Forestry activities can be compatible with net CO₂ sequestration, but active policies need to be in place to maintain the level of sequestration

In 2014, net CO₂ sequestration in the European forest (EU-28 along with Eastern European countries and Russia) totalled 720 megatons or 9% of European CO₂ emissions. Statistics on regions which have a major forestry sector (Scandinavia, the southeast of the United States) show that forestry activities can be compatible with a long-term increase in the amount of wood, and thus sequestered CO₂, in the forest (see Figure 8).

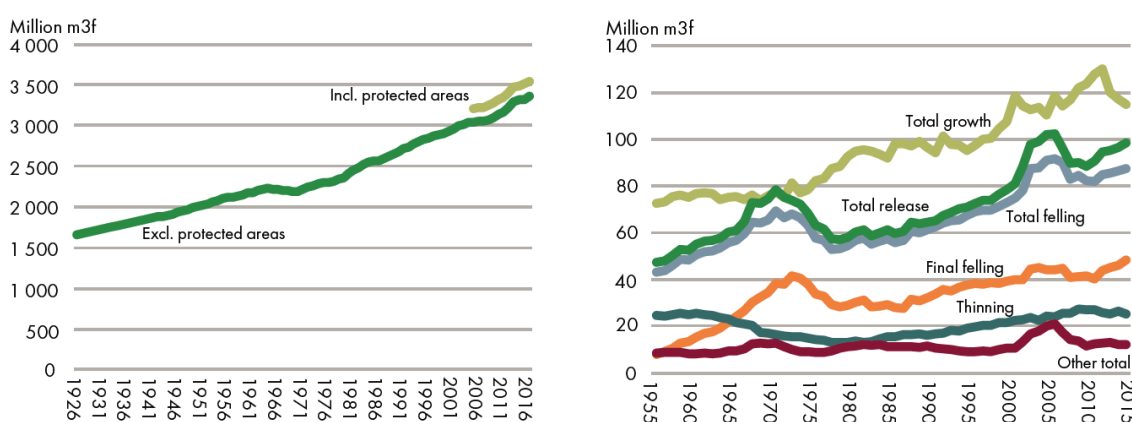


Figure 8. Left graph: The volume of wood in Swedish forests has more than doubled since 1926. Right graph: Annual net growth has increased since at least 1975, in parallel with a rising trend in harvesting. Source: (Holmgren, 2019).

In addition, it has been observed that in the European Union, there seems to have been a reduction in CO₂ absorption in recent years, from over 300 megatons of CO₂ in 2000 to around 250 megatons in 2017 (see Figure 9). This is due to a combination of forest aging and the increasing impact of drought, heat and storms caused by climate change, but also to an increase in harvesting to obtain both sawnwood and bio-energy. Even when taking into account the LULUCF regulation (Land Use and Land Use Change and Forestry), which requires each EU Member State to offset carbon emissions stemming from land use change with an equivalent amount of captured carbon, it is expected that the observed decline in CO₂ absorption will continue to little over 200 megatons in 2030, unless the trend is countered by additional EU policies. Measures might include the use of existing information tools and maps which can provide input for the formulation of management strategies for the European forest.

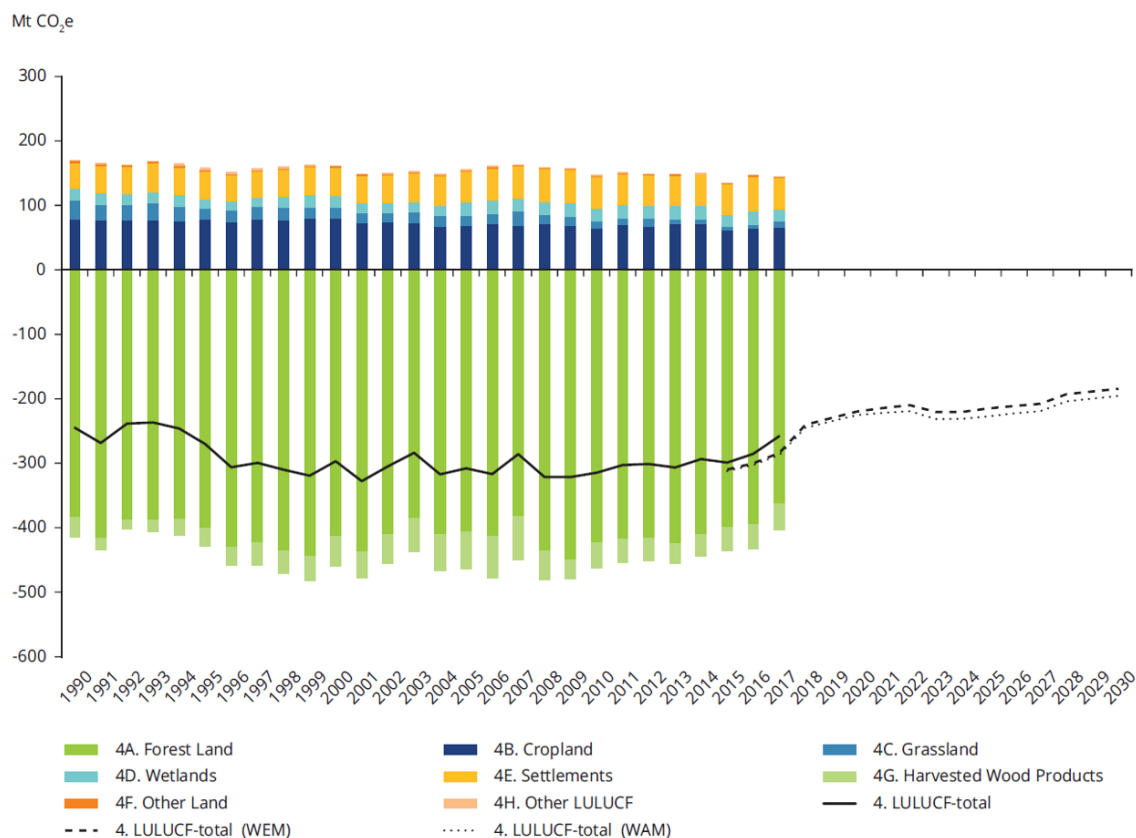


Figure 9. Carbon emissions and carbon absorption caused by land use, land use change and forestry (LULUCF) in the EU according to (EEA, 2019). WEM and WAM refer to two different future scenarios: WEM stands for With Existing Measures, WAM stands for With Additional Measures.

7. Allegations about abusive practices in wood pellet production need to be taken seriously and be more properly investigated by an independent party

Both in the Netherlands and internationally, the biomass debate is dominated by increasingly ardent discussions sparked by supposed abusive practices in the wood pellet industry, such as the felling of natural forest and the pelletisation of entire trees, and by the question of how detrimental the use of wood pellets for heat and electricity is to the climate and biodiversity.

In these discussions it is vital to bear in mind several points about wood pellets. First of all, they are generally not the main product of forestry activity (see Figure 10). In the second place, they are not produced from valuable whole trees of sawnwood quality although, thirdly, it is possible to obtain pellets from other whole trees, such as those felled in thinning operations, and trees harvested during clear-cutting but that cannot be used as sawnwood because they are damaged or warped. A fourth consideration is that pellets may take up a more substantial proportion of the wood harvest if demand continues to rise and the demand for pulp and paper decreases. Finally, pellet production is limited by an upper threshold in terms of the possibilities for expansion within the presently available acreage.

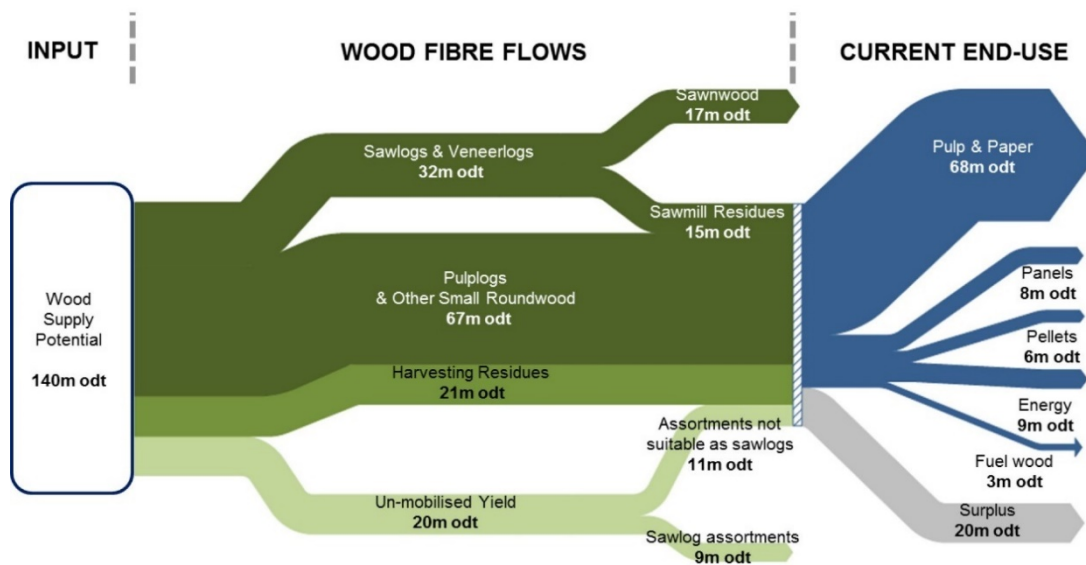


Figure 10. Wood flows in the southeast US in 2014. Sawnwood represents 12% of the supply potential. End products pulp and paper make up almost half of the potential, and wood pellets more than 4%. Source: Pöyry (2014).

This does not retract from the fact that claims — particularly those made by NGOs — that abusive practices are taking place on a structural basis should be investigated more thoroughly by an independent party. If found to actually take place, on any scale whatsoever, abusive practices must be combated. After all, no upright party has an interest in practices which contravene national and international legislation and clash with any certification schemes devised by the producers themselves, since they tarnish the reputation of the wood pellet industry as a whole.

8. It is recommended to develop an EU-level vision of the most optimal uses of marginal, degraded and abandoned agricultural land, on the basis of objective information

Both globally and in the European Union, there are large areas of land that have already been abandoned or fallen into disuse, or are in danger of being abandoned in the long term. The forecast for the EU is up to 20 megahectares by 2030, or 11% of agricultural land (see Figure 11). There are also large areas which have become marginal or degraded (see Figure 12). This land is hardly used, if at all. It would be beneficial to develop an EU-level vision of what can be done with these types of land, considering options such as nature development, biomass cultivation and extensive agriculture. The effort should build on objective bottom-up information, part of which is already available online¹⁰. A great deal of research is already under way into whether this land can be used for biomass cultivation and, if found to be so, what the most well-suited crops are for this purpose. Biodiversity is an important issue to be taken into account: it is known that about one third of marginal land overlaps with High Nature Value farmland¹¹ and Natura 2000 areas, and that biomass cultivation on the remaining marginal land can be combined with biodiversity conservation, or even lead to enhanced biodiversity. This does, however, require proper prior assessment of the biodiversity value at the regional level. In addition, a considerable improvement in carbon sequestration might be brought about by growing perennial energy crops, such as elephant grass and willows, on land with a low yield potential. These types of land are now often maintained as low-yield in order

¹⁰ Examples are the European S2BIOM project (<https://s2biom.wenr.wur.nl/web/guest/home>) and the MAGIC project (<https://magic-h2020.eu/>), which both count on participation by Wageningen University & Research.

¹¹ This is agricultural land with a high biodiversity value.

to remain eligible for direct payments from the EU Common Agricultural Policy. Currently used crops do not make optimal use of the land, and consequently the soil is vulnerable to leaching, erosion and loss of carbon.

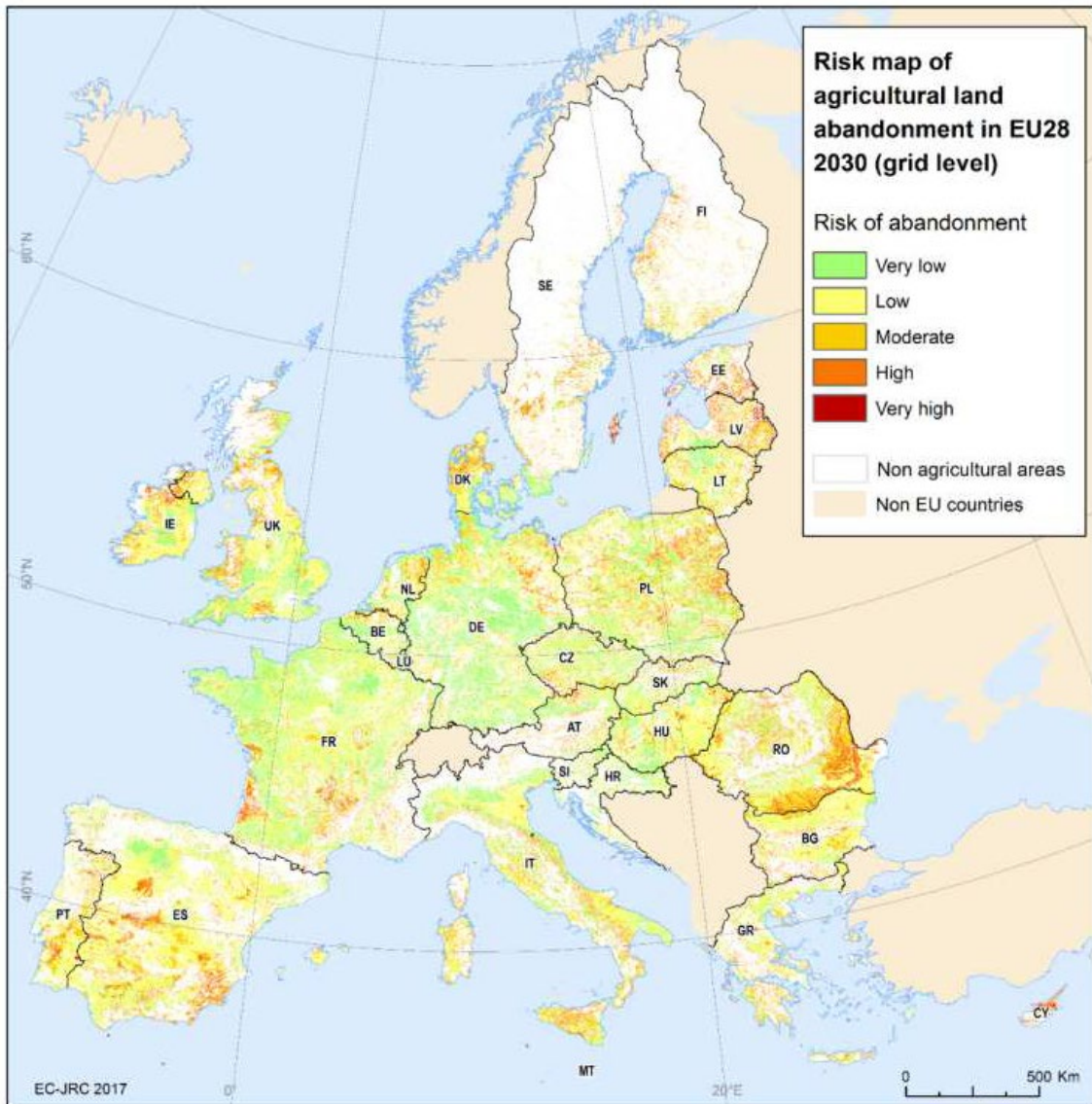


Figure 11. Risk of abandonment of agricultural land in the EU in the period 2015–2030. Source: JRC (2018).

The use of abandoned, marginal, or degraded land means that the European Union becomes less dependent on imports of food, feed and biomass, and offers opportunities to generate new revenue in agricultural regions that are increasingly being abandoned, or are at risk of being abandoned.

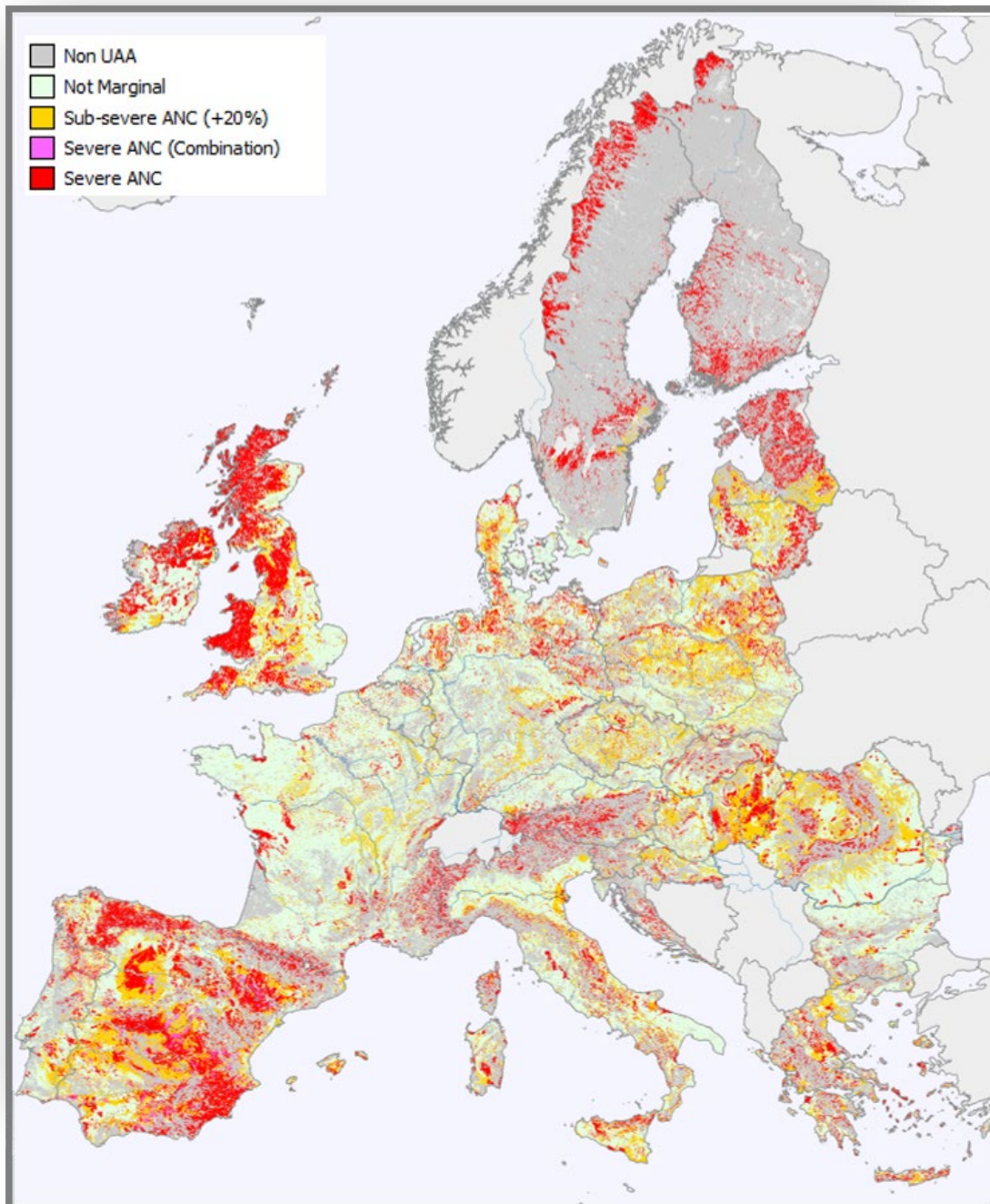


Figure 12. Marginal land, or Areas with Natural Constraints (ANC), in the EU. Categorisation based on a combination of six criteria: 1) harsh or extreme climate, 2) soil too wet, 3) soil fertility low, 4) soil contamination, 5) unfavourable root conditions, 6) unfavourable site conditions. UAA stands for Utilised Agricultural Area. Taken from Elbersen et al. (2018).

9. Implementation of EU legislation reduces the likelihood of ILUC ¹², but it is necessary to remain vigilant about potential land use changes triggered by the drastic increase in demand for biomass

The increasing production of biomass may lead to indirect land use change because it can displace food and feed production. The debate on the issue has been going on for a long time. The rates of CO₂ emissions caused by indirect land use change cover wide ranges of values, and the literature shows that those ranges have hardly decreased since 2012 (see Figure 13). This is mainly due to the fact that measures to prevent land use change are implemented with a force that can vary greatly from case to case. The most important measures, ordered by decreasing effectiveness, are: 1) protecting areas with large carbon stocks or high biodiversity value; 2) increasing agricultural yields; 3) producing biomass on abandoned or otherwise unused or marginal (agricultural) land; 4) prioritising the use of residual flows from agriculture, forestry and the food processing industry. Policies in the EU and elsewhere, such as those drawn up in the ILUC Directive, therefore focus mainly on minimising risks of ILUC by, among other things, phasing out biofuels derived from raw materials with the highest risk (e.g. palm oil) and by radically limiting the increase of food crop-based biofuels after 2020. Those policies also deal with the development of methods to determine ILUC risks. A large number of stakeholders indicated that the best approach to reducing ILUC risks is alignment with the pathway being followed in the EU. However, they also stressed that the risk of negative effects produced by ILUC and displacement is real, and will remain real, due to a possible strong growth in demand for biomass in the future.

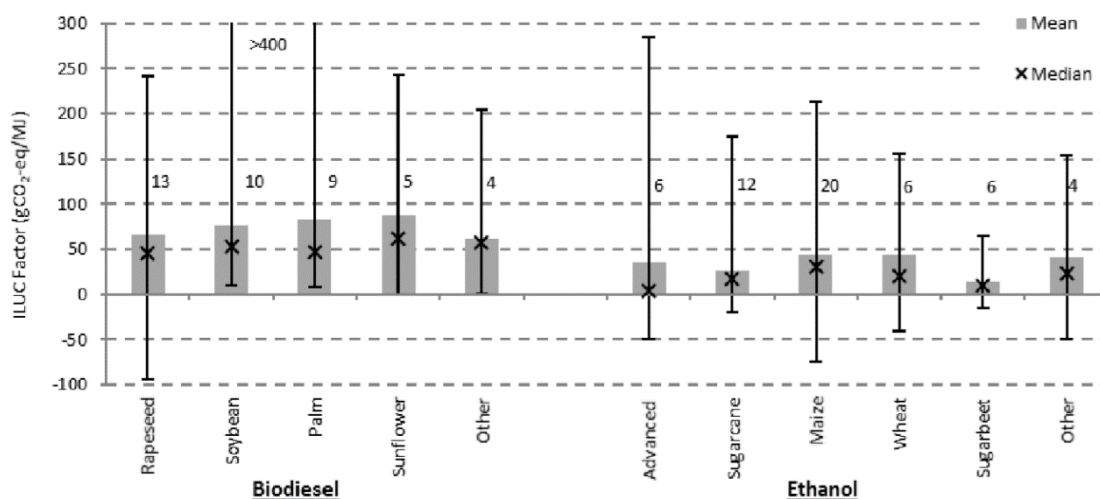


Figure 13. ILUC factors for biodiesel and ethanol over a 20-year period. Data retrieved from literature. Grey bars: average values; black crosses: median values; black lines: maximum-minimum range. The number of studies is stated next to each grey bar. For comparison: the CO₂ emissions of fossil diesel and petrol, including emissions in the production chain, total 90 g CO₂/MJ. Source: Woltjer et al. (2017).

¹² ILUC stands for Indirect Land Use Change — the fact that expanding biomass production can lead to land use changes elsewhere by displacing food and feed production.

10. It is important for the government to choose for a clear cascading principle, to actively communicate its choice and to adjust its policies accordingly

All stakeholders support the principle of using biomass in the most high-grade, efficient and optimal way possible (cascading) and there is also some agreement as to which applications can be regarded as high-grade and which as low-grade (see also the section *Points of agreement*). Nevertheless, there is still a lot of discussion about how cascading should or could be structured. Different perspectives or criteria lead to different preferences for applications of certain biomass flows, while there are also different visions as to the path to be taken to achieve the aimed-for situation:

- from high-grade to low-grade, or top-down: lower-grade applications are only 'permitted' if the biomass has first been used in a higher-grade application;
- from low-grade to high-grade, or bottom-up: low-value applications process large volumes and from that basis, gradual innovations are introduced towards applications higher up in the cascade hierarchy;
- integral or cross-sectoral: find the best match between applications and types of biomass or biomass flows; this includes considering integration with food and feed production based on bio-refinery.

The market stimulates, to a certain degree, high-grade applications — that is, when the associated cost is high. But according to many stakeholders, social and environmental impacts have not been factored into the price yet. To give an example, they argue for a levy on CO₂ or carbon content. The Dutch government has stated it wants to follow the *Transition Agenda for Biomass and Food*, which takes the first steps towards the cascading principle to be applied and the desired policy interventions, such as increasing the proportion of biobased raw materials that are being used¹³. Stakeholders note, however, that current policies, such as the SDE++ scheme, do not conform to these points sufficiently enough. Since the positions of the stakeholders are not fully consonant to each other, it is important that the government ultimately forms a judgment and chooses for a clear-cut cascading principle, actively communicates its decision and adjusts its policies accordingly¹⁴.

11. Direct burning of biomass in modern installations appears to have a minor effect on air quality; replacement of older stoves and boilers can lead to a significant improvement

Modern biomass boilers, pellet stoves and wood-burning stoves (DIN+) with heat outputs up to 5 megawatts have a limited effect on air quality in the Netherlands, compared to older, conventional wood-burning stoves and fireplaces (see Table 3). In addition, the toxicity of particulate matter from a properly functioning boiler or pellet stove is much lower than that of particulate matter from an older wood-burning stove. It is possible to achieve significant reductions in emissions, and improvements in efficiency, by replacing older stoves and fireplaces with modern devices.

Even though larger, modern installations also only result in a small deterioration in air quality — provided they meet the emission requirements — they do produce more emissions than comparable gas-fired installations. If the number of biomass installations continues to grow, there could surely be a negative impact on air quality. As announced in the Dutch Climate Agreement, the emission standards for smaller boilers will be made stricter as of 2022, a move that is supported by the sector. It is also important that concerns and warning signs about failure to comply with emission requirements are taken seriously and that maximum transparency is exercised. Another positive measure would be for an independent party to

¹³ Some experts stress that the proportions should also depend on the harvested volumes in order to dissipate undesired price fluctuations. This follows the example of the system in Brazil where sugar cane is used for the production of either ethanol or sugar, depending on the harvest and prices.

¹⁴ For further details, see *Cascading Roadmap (in Dutch)* (RVO et al., 2020) and *Roadmap for National Biofuels (in Dutch)* (Corbey & Asselt, 2020).

carry out further research into these issues, particularly into the concrete impact of use of smaller boilers by businesses and in the built environment.

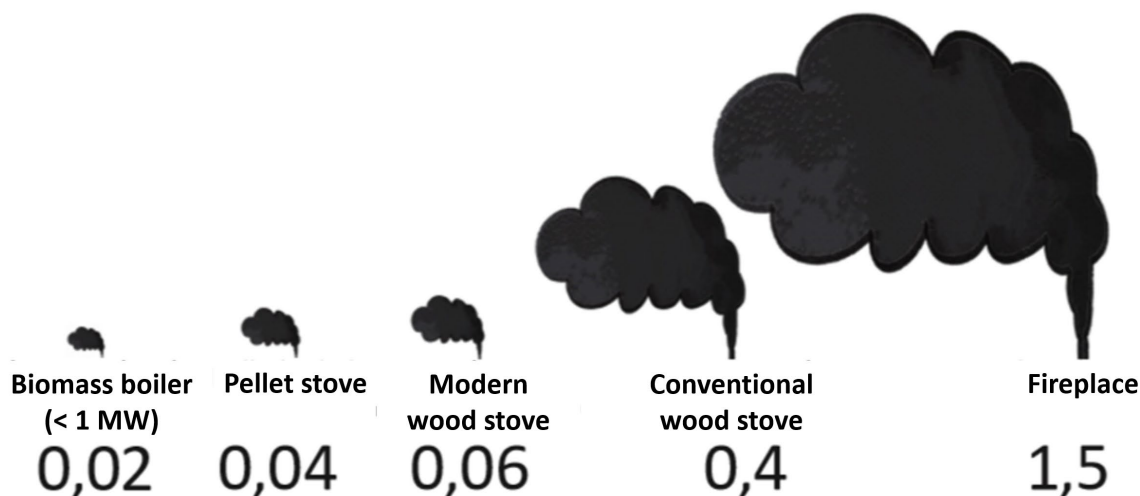


Figure 14. Emissions of particulate matter (PM_{2,5}) from various combustion techniques in 1000 tonnes per PJ of generated heat. A fireplace emits, per PJ, 75 times more particulate matter than a modern biomass boiler. Source: Koppejan (2018); Graphics by NVDE.

12. Legislation that addresses sustainability issues is greatly helpful, and needs to achieve a balance between making it fraud-proof and making it practicable

Dutch and European legislation and the certification schemes linked to it are important means to positively influence the sustainability of biomass and its applications. But there is also a great deal of resistance and distrust, supported by the argument that official regulations will never be able to guarantee full-scale sustainability or — something which to date has not been proven — eliminate the risk of fraud. Regulations can only cover indirect land use change, carbon debt and the impact on biodiversity to a certain degree. At the same time, stakeholders point out that legislation may lead to such levels of complexity (in some cases, such as the SDE+ scheme, this has already occurred) and high costs, that it becomes difficult to implement. This applies, for example, to smaller forest owners whose income often depends only marginally on biomass for energy applications, while the corresponding sustainability criteria are tighter than those for non-energy applications.

What is important is that the debate on further tightening of legislation and, above all, on upholding EU legislation keeps going on, and that it seeks to achieve a balance between fraud-proof measures and practicability. A further reason for maintaining the debate is that it is not possible to simply introduce separate rules at the national level that are stricter than those adopted in the EU.

13. Registration of carbon emissions from harvested wood at the time of harvesting serves to avoid double counting, but it seems that it is not done properly in all countries

Under the Paris Agreement, the standard approach to greenhouse gas emissions registration is that carbon emissions stemming from harvested wood are allocated to the country where the harvest takes place. When the wood is burned, emissions are considered to be zero in order to avoid double counting. Critics argue that, as a result, countries where biomass is used 'shift' their responsibility onto the countries where biomass is harvested. However, allocating emissions to the country or sector that burns the biomass, would mean that harvesting can be carried out with impunity in sourcing areas, while the use of that harvest elsewhere does not offer any benefit in terms of CO₂ reduction, or even leads to higher emissions. A second point of criticism is that the implementation and verification of emissions registration related to

forests and forestry activity is not carried out properly in many countries. This criticism seems to be legitimate up to a point, but opinions are divided among stakeholders on how serious the deficiency is.

14. It is difficult to operationalise the fair-share principle in policies. It would be more fitting for the debate to take place at a higher level and in a more integrated form

The fair-share discussion deals with the question of how big a claim the Netherlands is allowed to make on the amount of sustainable biomass available in Europe and worldwide. In the biomass debate, various distribution keys have been proposed to serve as a measure of this claim, including the share of the Netherlands in global GNP (0.9%), in the global population (0.22%), and in the global land area (0.03%). When comparing these percentages to the biomass claims calculated for the various perspectives in Table 2, what attracts attention is that in almost all cases, the claim is larger, or even much larger, than would be considered fair under those distribution keys.

During the discussion with stakeholders, however, it emerged that these kinds of distribution keys should mainly be seen as indications that provide additional insight into the balance between supply and demand and that can, at most, serve as a starting point for deliberations on how fair distribution might be translated into policy. The stakeholders also stated that the fair-share discussion is much more a question that enfold a widely shared desire for a fair distribution of raw materials that contributes to a more equitable distribution of wealth and prosperity around the world. This means that the discussion should in fact be conducted at a higher level and in a more integrated form.

Reaching an agreement on hard limits on the amount of biomass that may be used in the Dutch economy is therefore extremely difficult (nor is *this particular debate* being held for other products such as oil or cocoa). This difficulty can also be an obstacle to the opportunities for Dutch companies to ensure that their available infrastructure and knowledge contribute optimally to an international bioeconomy. According to some stakeholders, what should be pursued in particular is fair-trade practices, while keeping the primary focus on proper (social) sustainability criteria and monitoring, at least insofar as these are not already covered by the applicable certification schemes.

Points of attention for a sustainability framework

The large ranges in the expected availability of and need for sustainable biomass in the future are, to a large extent, the result of the differing ways in which the identified perspectives look upon the issues. As such, they pose a challenge for efforts to design the integrated sustainability framework for biomass sought by the Dutch government. Building on the stakeholder process, the study by CE Delft, the literature review and the drawn conclusions, the project team has attempted to specify several points of attention which may be relevant to such a framework.

General points of attention

The fact that not all the requirements and ambitions for the production and application of sustainable biomass are compatible with each other means the Dutch government must necessarily provide a clearly argued and well-communicated assessment. This creates transparency and increases the chances of gaining acceptance and support from the stakeholder community.

According to PBL Netherlands Environmental Assessment Agency, the following points of attention are relevant to the deliberations:

- It would seem a risky strategy for the government to go for a climate-neutral circular economy without assigning a significant role to biomass.

- It is therefore advisable to focus, on the one hand, on increasing the availability of sustainable biomass, particularly from agriculture, and, on the other hand, on reducing the need for biomass.
- None of the identified perspectives foresees the Netherlands being able to satisfy its own needs for biomass, but
- establishing a fair share for the Dutch economy has proven to be extremely difficult, which means government-imposed import restrictions do not seem suitable as part of a sustainability framework.
- It is advisable to work towards development of both production of sustainable biomass and production of liquid or gaseous hydrocarbons with the use of sustainable electricity.

The likelihood of the choices made by the Dutch government being accepted and supported could perhaps be increased by ensuring that the stakeholders and experts who were involved in this project continue to be engaged in the future in one way or another in the policy process. By providing the government with input in the form of stakeholder knowledge, the debate on the sought-for integral sustainability framework and the decision-making process based on that debate, can both gain in quality and hopefully become less controversial — even though it is expected that overall consensus will never be reached. The chances of such a continuation succeeding are greatest when it can be linked to specific output, such as the formulation of a joint development agenda and its programmatic implementation.

In such an agenda, today's controversies could serve as input for tasks concerning research, innovation and implementation. If the resulting findings are used for interim assessments of whether certain goals are still acceptable or achievable, and adjusting them if necessary, opposing positions could be made more manageable.

In line with the opinion of many stakeholders, it is recommended to also focus the development agenda on robust, industrial-scale techniques for biomass conversion and separation. These techniques include gasification, supercritical water gasification, pyrolysis, torrefaction and biorefinery concepts¹⁵. They increase the flexibility and ability to deploy available biomass flows. Consequently, the 'biomass system' as a whole becomes more robust, because in times of shortages or, conversely, diminishing demand, it will be possible to switch to a different type of biomass or application.

Specific points of attention

Based on the conclusions drawn above, it is possible to also advance some more specific points of attention for the sustainability framework that is to be developed:

- Despite the requirements laid down in legislation in the EU and elsewhere, biodiversity loss caused by the use of biomass is a concrete risk. It is therefore hugely important that the consequences of increasing biomass use are closely monitored, and that policies carefully consider the balance between climate change mitigation and biodiversity loss. Given that the nature and the risk of adverse effects both vary by biomass flow and by sourcing area, custom-made measures are required (see section *Monitoring and research* below).
- Having healthy and fertile soil with sufficient organic matter is crucial and must be safeguarded in accordance with EU legislation.
- For issues concerning indirect land use change (ILUC), it seems sensible to adhere to the legislative processes of the EU.
- Setting a hard maximum carbon debt or payback period for biomass does not seem to be workable. However, it *is* possible to identify biomass flows that minimise the *risk* of high carbon debt or overly long payback periods.

¹⁵ This is dealt with in further detail in *Roadmap for National Biofuels (in Dutch)* (Corbey & Asselt, 2020).

- Apply a clear-cut cascading principle, partly based on the *Cascading Roadmap* and the *Transition Agenda for Biomass and Food* which indicate the first steps towards the task.
- Consider including impacts on air quality and health in a sustainability framework. Various stakeholders have expressed serious concerns in this regard, even though the contribution of modern biomass combustion plants to the deterioration of air quality and health is limited.

When drawing up a sustainability framework, the question remains to what degree it is legally possible for the Netherlands to impose requirements on imported biomass that are stricter than those applied by the European Union. Therefore, the debate on whether to maintain or further tighten EU legislation will have to continue to take place at the European level too.

In this regard, the dilemma that arises is that legislation that is too strict or too detailed can lead to such levels of complexity and high costs that it becomes difficult to implement. A balance should therefore be sought in the sustainability framework between fraud-proof measures and practicability.

Monitoring and research

EU legislation, both existing and under development, and certification schemes already cover a broad set of sustainability criteria. However, they can never guarantee full sustainability or exclude the risk of fraud. As a consequence, it is not possible to blindly assume that existing legislation and certification schemes are sufficient for use in the sustainability framework. This report therefore presents a number of suggestions, which relate mainly to the areas of monitoring and research:

- Set up new or improved track-and-trace systems and monitoring, at the scale of the landscape, of the consequences of increasing biomass production on direct and indirect land use changes and biodiversity.
- Thoroughly examine warning signs from NGOs and other parties that practices are taking place that do not fit in with sustainable forest management, and, if the warnings are found to be relevant, put an end to those practices.
- One point of attention must be that emissions registration or carbon accounting in the sourcing country is carried out properly.
- At EU level it should be investigated to what extent marginal, degraded and abandoned (agricultural) land in the EU, or all of Europe, could be suitable for nature development, biomass cultivation or extensive agriculture.
- Given the ambitious goals formulated by the government for the application of biomass for materials in fields such as the building industry, it is important that research is carried out into possible future demand. At present, there is little information on this matter.

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