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## Research on the Impact of Burning Biomass on Biodiversity



Trees hold significant stocks of micronutrients in limbs and leaves. Removing forestry residues can deplete soil nutrient status, leading to loss of site productivity and the ability to regrow the forest. Biomass harvesting is promoted to give value to wood which is "low value" because it is not valuable as sawnwood (for example because species, flaws, holes, etc).

However, these are the trees most valuable for biodiversity. Removing such trees significantly reduces habitat for cavity-dwelling animals such as owls and squirrels. Removing dead and decaying wood also removes materials from base of the food chain that support complex fungi and invertebrate communities.

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Serious Mismatch Between Science & Policy  
[2019-08-22-bioenergy-serious-mismatches-continue-between-science-and-policy-in-forest-bioenergy-english.pdf](#)

This report based on recent work by Europe's Academies of Science was commissioned by 16 international institutions and finds that current policies are failing to recognize that removing forest carbon stocks for bioenergy

### RECENT

[2019-08-22-bioenergy-serious-mismatches-continue-between-science-and-policy-in-forest-bioenergy-english.pdf](#)

2019-08 \\ BioEnergy

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[2019-07-08-eqn-report-threat-map-are-forests-the-new-coal-](#)

leads to an initial increase in emissions and states the periods during which atmospheric CO<sub>2</sub> levels are raised before forest regrowth can reabsorb the excess emissions are incompatible with the urgency of reducing emissions to comply with the objectives enshrined in the Paris Agreement.

*"...Concern has also been expressed over the effects of increased forest biomass harvesting on ecosystem biodiversity and losing services such as the ecologic regulation of water and nutrient cycles or soil maintenance..."*

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## Climate Change and Land

[2019-08-08-ipcc-summary-report-for-policymakers-on-climate-change-and-land-english.pdf](#)

This report was commissioned by the IPCC and is intended for policymakers and discusses sustainable forest management and carbon sinks and storage methods.

*"... Expansion of areas under agriculture and forestry, including commercial production, and enhanced agriculture and forestry productivity have supported consumption and food availability for a growing population. With large regional variation, these changes have contributed to increasing net GHG emissions, loss of natural ecosystems (e.g. forests, savannahs, natural grasslands and wetlands) and declining biodiversity..."*

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## EU Biomass Legal Case Main Arguments

[2019-08-00-eu-biomass-legal-case-main-arguments-english.pdf](#)

This legal document contains the main arguments in the EU Biomass Legal Case where the applicants seek annulment of the inclusion of "forest biomass" – essentially trees, including, stems, stumps, branches and bark – as a renewable fuel within the Renewable Energy Directive (recast) 2018.

*"...The EC Bioenergy Impact Assessment report points out that "an excessive removal of harvest residues, or the removal of stumps, can harm soil productivity, biodiversity, and water flows." However, the impact assessment*

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2019-07 \ \ EPN

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[2019-06-23-wageningen-university-research-duurzame-biomassa-voor-de-productie-van-waterstof-dutch.pdf](#)

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[2019-06-17-nrdc-dogwoodalliance-southern-environmental-law-center-global-markets-for-biomass-energy-are-devastating-us-forests-english.pdf](#)

2019-06 \ \ Multiple NGO's

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[2019-06-14-southernenvironment-burning-trees-for-power-the-truth-about-woody-biomass-energy-and-wildlife-english.pdf](#)

2019-06 \ \ Southern Environment

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[2019-06-03-tweede-kamer-hoorzitting-bomen-kappen-voor-klimaat-en-natuur-roofbouw-of-noodzakelijk-kwaad-dutch.pdf](#)

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[2018-08-28-flinders-university-eu-renewable-energy-directive-revisions-put-biodiversity-at-risk-english.pdf](#)

2018-08 \ \ Flinders University

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[2014-12-00-bvor-houtchips-als-brandstof-dutch.pdf](#)

2014-12 \ \ BVOR/RVO

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[2013-08-07-rvo-bio-energie-input-houtige-biomassa-dutch.pdf](#)

2013-08 \ \ RVO

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*does not acknowledge that simply harvesting trees represents the total removal of an ecosystem, and that recovery can take decades to several centuries..."*

*"...Trees hold significant stocks of micronutrients in limbs and leaves. Removing forestry residues can deplete soil nutrient status, leading to loss of site productivity and the ability to regrow the forest. Biomass harvesting is promoted to give value to wood which is "low value" because it is not valuable as sawnwood (for example because species, flaws, holes, etc)..."*

*"...However, these are the trees most valuable for biodiversity. Removing such trees significantly reduces habitat for cavity-dwelling animals such as owls and squirrels. Removing dead and decaying wood also removes materials from base of the food chain that support complex fungi and invertebrate communities..."*

Read the summary:

[2019-08-00-eu-biomass-legal-case-environmental-objectives-english.pdf](#)

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## Soil Compaction and Deformation in Forest Exploitation

[2019-07-25-wageningen-university-probos-soil-compaction-and-deformation-in-forest-exploitation-english.pdf](#)

This report was commissioned by the Dutch Government and was intended for the green sector (forest, nature and urbangreen managers) and the policymakers to create awareness in the forest sector on the effects of forest exploitation on the soil and how to protect and preserve forest soils during forest exploitation.

*"...Every year an average of 1 million m3 of industrial round wood is harvested in the Dutch forest. In most harvest operations the use of machines is common practice. There is a growing awareness among forest managers that the use of machines in forest operations can have negative consequences on the forest soil, causing soil compaction and deformation. This may lead, among other things, to degradation of soil structure, reduction of the soil's water storage capacity, lack of oxygen in the soil, death of fine roots and reduced rooting, all impacting biodiversity and forest productivity..."*

*"...Soil compaction and deformation occur during forest exploitation with heavy machinery due to complex interactions of soil pressure, shearing forces and vibrations into the soil. These effects do not only take place right underneath*

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*the machine but can also influence the soil up to 0.75 meter sideways of the wheels. Soil compaction does not only occur at the actual moment of machine traffic. Also, one to two years after machine traffic further soil compaction can occur..."*

*"...there is a general lack of knowledge in the forest sector on the (exact) impact of forest exploitation machines on the soil. Also, practical knowledge on how to prevent or counteract negative effects of forest exploitation on the forest soil is missing..."*

*"...Although in this chapter, chemical, ecological and productivity effects are discussed separately, it is important to note that these effects are all intertwined. Complex interactions between these aspects together form the forest ecosystem and shape the overall effect of machine traffic on the forest productivity, biodiversity and general vitality..."*

*"...Soil disturbance can have a negative impact on soil biodiversity, leading to decreased stand fertility, productivity and vitality on the long term..."*

*"...compaction also leads to destruction of pore continuity, increasing soil bulk density and decreasing soil porosity and air conductivity. Gas exchange between the soil and the atmosphere is hampered, which leads to an altered CO<sub>2</sub> and O<sub>2</sub> exchange between soil and atmosphere. This altered gas exchange can be problematic. Oxygen (O<sub>2</sub>), which is essential for soil life and chemical processes, cannot get into the soil and carbon dioxide (CO<sub>2</sub>) cannot get out. Low O<sub>2</sub> levels decrease the presence of soil life and limit growth of plants and trees..."*

*"...Lack of oxygen also causes problems for mycorrhizae, which have a symbiotic association with tree roots to obtain the energy needed for decomposition of organic material, from which in turn nutrients become available for tree roots to take up. Therefore, soil compaction can hinder nutrient uptake by trees through mycorrhizae and therefore effect forest productivity and vitality. In addition, the activity of microorganisms decreases with increasingly anaerobic conditions, which leads to a loss of soil biodiversity and may indirectly influence forest (tree) vitality..."*

*"...Besides the effects on nutrient uptake via mycorrhizae, soil compaction has negative effects on the absorption of minerals by the plant's root system. The low oxygen levels in compacted soils for example cause denitrification to occur, losing nitrogen as it evaporates during the process. In a leaching experiment simulating long term impacts of forest operations, found that concentrations of nutrients in solution like Ca<sup>2+</sup>, K<sup>+</sup>, Mg<sup>2+</sup> and Al<sup>3+</sup> were lower in disturbed forest floors and compacted forest soils, hence decreasing*

*the amount of nutrients available for plant uptake. Moreover, trees have difficulties taking up enough nutrients for growth under lower oxygen levels because oxygen is required to provide for the energy needed for transport and absorption processes within the plant..."*

*"...Overall, soil compaction negatively affects forest growth. Many of the effects discussed in the previous paragraphs, like decreased gas exchange capacity or rooting ability, have an influence on forest regeneration and growth. For instance, water shortages cause the plant to close its stomata, hence hampering photosynthesis. Reduced photosynthesis means a plant can produce less sugars needed for plant growth. Consequentially, plant growth, even forest productivity, can be reduced..."*

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## Threat Map Are Forests the New Coal

[2019-07-08-epn-report-threat-map-are-forests-the-new-coal-english.pdf](#)

This report was commissioned by the EPN as a wake-up call to those governments that are subsidising coal to biomass conversions; will persuade investors that financing biomass power is not sustainable; and will persuade energy analysts, retailers and consumers to distinguish forest biomass, as a high-carbon renewable energy technology, from lower-emitting technologies like wind and solar.

*"...In addition to the climate impacts, biomass burning exacerbates the biodiversity crisis because of the intensity of harvests designated for energy use..."*

*"...Where logging is an accepted use at a lower intensity, the advent of high intensity harvests for biomass may lead to serious depletion of nutrients in the ecosystem and impede regeneration..."*

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## Sustainable Biomass for Production of Hydrogen

[2019-06-23-wageningen-university-research-duurzame-biomassa-voor-de-productie-van-waterstof-dutch.pdf](#)

This report was commissioned by the Dutch Government and was intended for the green sector (forest, nature and urbangreen managers) and the

policymakers as they need a scientific evidence- based underpinning of the use of biomass (branch and top timber) as a sustainable raw material for bio-energy production.

*"...Sustainability concerns the following aspects that have to do with the ecosystem:*

- effects on biodiversity;*
- effects on soil quality (soil chemical: nutrient management and physical: compaction);*
- effects on carbon cycle (in soil and vegetation);*
- other effects on environmental quality (eg air quality);*
- indirect land use effects (may play a role in the creation of new forests);*
- other effects (eg logistics / transport movements).*

*"..The arguments of the proponents and opponents [of burning woody biomass] have to do with the:*

- CO<sub>2</sub> and energy balance in the chain and the moment at which you measure the carbon stock;*
- biomass additional growth in relation to consumption and the effects of harvest on the landscape and the ecosystem;*
- guaranteeing sustainability through an administrative system of certification;*
- market forces and market failures, due to the exploitation of subsidies (level playing field) and the absence of a CO<sub>2</sub>-related market mechanism;.."*

*"...[proposed] requirements for the various parties in the chain:*

*The use of biomass must lead to a substantial reduction in greenhouse gas emissions, calculated over the entire chain. The calculated reduction in greenhouse gas emissions must be at least 70% relative to the reference value for fossil fuels.*

- production of raw biomass must not lead to destruction of carbon reservoirs.*
- biomass production may not lead to long-term carbon debt.*
- biomass production must not lead to indirect land use change (ILUC) with a negative impact on carbon capture.*
- relevant international, national and regional / local laws and regulations are followed.*
- biodiversity must be preserved and, where possible, strengthened.*
- the production capacity of each forest type must be maintained.*
- forest management contributes to local economy and employment.*
- sustainable forest management is realized on the basis of a management system..."*

*"..Healthy soil is of great importance for a sustainable harvest of wood and biomass. Important insects of a healthy soil are nutrient management and physical soil quality ... With an increase in the harvest level and the harvesting*

*of branch and top timber, the discharge of these nutrients is substantially increased. This can lead to a decrease and even a shortage of available nutrients, especially in forests on poorer poor soils ... These nutrients are important for the functioning of the forest as an ecosystem (preservation of biodiversity) ... "*

*"...Heavy harvesting machines are nowadays often used for harvesting. These machines can disrupt the soil and therefore the soil fauna and flora..."*

*"... if nature areas are converted for the production of biomass, this will have serious negative effects on biodiversity in the short term (direct effects) ... With these kind of conversions, it can take centuries for the effects of land use change on biodiversity to be restored..."*

*"...In addition to the amount of harvest [from woody biomass], the method of harvesting is also important for biodiversity. Harvesting of wood can have a disruptive effect on animals, for example during the breeding season, and plants and soil can be damaged. The scale and frequency of the harvest also influence biodiversity. Harvest over larger areas (more than 1 hectare) must be handled with care ... In forests with many plants that are characteristic of old forest, one must be cautious with large logs. For wind sensitive species (including Douglas and Norway spruce), wind throw must be taken into account. Beech may cause sunburn on the bark in direct sunlight, which can lead to death ..."*

*"...For energy applications, the harvest of branch and top timber is in the spotlight. However, this can have a number of disadvantages. Nutrients are removed with the branch and top timber, which can lead to shortages. On nutrient-poor soils, the harvest of take-and-top timber can lead to a negative nutrient balance. It can also have a negative effect on insects and other species bound to deadwood .... Dead wood is important for many plants, mushrooms and insects ... Maintaining standing dead trees is also good for biodiversity ... "*

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Global Markets for Biomass Energy are Devastating Forests  
[2019-06-17-nrdc-dogwoodalliance-southern-environmental-law-center-global-markets-for-biomass-energy-are-devastating-us-forests-english.pdf](#)

This report commissioned by NRDC, Dogwood Alliance, Southern Environmental Law Center exposes the damaging logging practices used to

source the biomass industry, including the clearcutting of iconic wetland forests.

*"...Global demand for wood pellets is devastating forest ecosystems in the Southeast United States... Despite the claims of the industry, the independent reporting shows a disturbing pattern: wood pellets burned by Drax and others come from wood that is harvested from native hardwood forests in an area designated as a global biodiversity hotspot. They also spotlight the vast quantities of whole trees and other large-diameter wood— biomass feedstocks known to be high-carbon..."*

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## Burning Trees for Power the Truth about Woody Biomass [2019-06-14-southernenvironment-burning-trees-for-power-the-truth-about-woody-biomass-energy-and-wildlife-english.pdf](#)

This report commissioned by Southern Environment states the many and extreme dangers for biodiversity caused by the logging and burning of woody biomass.

*"...Wildlife and biodiversity in southeastern U.S. forests are threatened by increased clearcutting of private lands to supply wood pellet exports to Europe...Privately owned forests are managed and harvested without much restriction or oversight to protect against large-scale clearcutting and loss of biodiversity. For example, most of the biodiversity in the southeastern U.S. is found on private land; yet private landowners are not required to survey for threatened or endangered species and few states in the region have additional legal protections for these imperiled species. This lack of regulation is significant since over 80 percent of forests in the southeastern U.S. are privately owned. This system has allowed the rapid expansion of unregulated wood pellet production in the southeastern U.S. and its export to Europe..."*

*"...Bottomland hardwood and other wetland forests in the southeastern U.S. are among North America's most valuable ecosystems; they remove nutrients and other pollutants from water to maintain the quality of streams, rivers, and estuaries, and sequester and store large amounts of U.S. carbon emissions. These forests are also among the U.S.'s most important habitats for wildlife. Despite these valuable ecosystem services, the U.S. Environmental Protection Agency estimates that 60 percent of the original almost 12 million hectares of bottomland forests in the southeastern U.S. have been destroyed..."*

*"...some of these highly biodiverse forests are now being clear-cut to supply wood for pellet mills in the southeastern U.S. Similarly, the Southeast's natural longleaf pine forests are extremely diverse and species-rich ecosystems that provide habitat for many endemic species..."*

*"...Biomass sourcing also relies heavily on softwood pulpwood and therefore incentivizes the conversion of natural forests to plantation pine forests. The increasing demand for woody biomass threatens the region's remaining naturally biodiverse longleaf pine forests. The U.S. Forest Service estimates that the South's naturally regenerating pine forests will decline by 25 to 58 percent from 2010 to 2060. Meanwhile, by 2060 artificial plantation pine is expected to comprise 24 to 34 percent of the region's forest area..."*

*"...As a result of the destruction of the region's natural bottomland hardwood and longleaf pine forests, numerous species dependent on these forests are now classified as rare, declining, and of conservation concern..."*

*"...The largest losses of natural forests in the Southeast are forecasted in Florida, South Carolina, and North Carolina (58, 35, and 30 percent loss, respectively). In particular, the region's bottomland hardwood forests, already "reduced to a mere fraction of their original extent," are "now being logged to supply the wood pellet export industry..."*

*"...Since 2013, reports and independent investigations have discovered that Enviva, the largest exporter of wood pellets from the southern U.S., sources wood for several of its North Carolina and Virginia wood pellet mills from clear cuts of wetland forests in the global biodiversity hotspot area. Large-scale clearcutting of mature bottomland hardwood forests negatively affects many vulnerable interior-nesting bird species and water quality. In addition to direct logging removals, increased residual removals (i.e., downed wood) in these forests can negatively impact forest regeneration and lead to habitat degradation..."*

*"...By 2060, the U.S. Forest Service projected that planted pine will comprise 24 to 34 percent of the South's forest area. The conversion of natural forests to plantations, specifically monoculture pine plantations, has significant negative impacts on biodiversity. These conversions are "widely recognized as a major risk factor associated with increased bioenergy demand," with a study funded by the National Wildlife Federation predicting that high levels of woody biomass harvest will threaten several indicator species in the region through large-scale changes to the type and extent of forest and farm habitats. After conversion, "the remaining forests [are] composed of more intensively managed forest and less of the bottomland hardwood and longleaf pine habitats that support biodiversity." The U.S. Forest Service recognizes that pine*

*plantations are "generally poor wildlife habitat," especially "when compared with natural pine and hardwood forests..."*

*"..The South's natural longleaf pine forests, in particular, are highly valued for their biodiversity due to high levels of diversity, endemism, and species-richness. Unfortunately, these prized forests are facing "near elimination," which the U.S. Forest Service acknowledged as "perhaps the greatest ecosystem alteration resulting from intensive forest management and land use conversion in the South..."*

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## Dutch Government Hearing Logging Trees for the Climate [2019-06-03-tweede-kamer-hoorzitting-bomen-kappen-voor-klimaat-en-natuur-roofbouw-of-noodzakelijk-kwaad-dutch.pdf](#)

This report commissioned by main parties like the Dutch State Forest Management and its former Director, Professors at the University and others concerned with the massive amount of trees being logged for biomass production.

*"..Input Staatsbosbeheer (Dutch state forest management):  
An important part of Dutch biodiversity is linked to forest; forests are rich ecosystems. Moreover, trees are a source for CO2 storage, and therefore an important key to tackling climate change. And trees yield wood; a sustainable and circular raw material for, for example, construction, furniture and cardboard..."*

*"..The Netherlands must become more wooded and forests must be given the time to develop... Staatsbosbeheer wants more forest in the Netherlands because of the climate, but certainly also for biodiversity and an attractive living and working environment. More than ever before, climate objectives demand this. That is why we want to plant 5,000 hectares of new forest in our own areas where possible in the coming years. We are currently identifying the most promising areas. But this is not nearly enough for solving the climate issue..."*

*"..In addition, we will work with provinces and other stakeholders on the future plans for PAS and take a good look at the N2000. Because if we are just as important can achieve biodiversity goals for open landscapes without or with less logging that is our strong preference. Some of the biodiversity goals can also go beyond the current ones nature areas. And if it cannot be otherwise, and trees must still be felled we advocate generous compensation..."*

*"..The Ministry of LNV recently announced that it would be working with a new national one forest strategy, which resolves inconsistencies in policy goals (biodiversity and climate) more work is being done on more new forest in the Netherlands and attention is being paid to it sustainable wood use..."*

*"..Input Natuurmonumenten forest management:*

*Trees store carbon, and forest clearing is at odds with this task. At this point we can be clear: Natuurmonumenten fully supports the climate task. Combating climate change is a new task in which everyone is responsible nature conservation, which is fully in line with our commitment to the Agriculture & Land Use sector table of the Climate Agreement, so Natuurmonumenten wants to and will explicitly review its forest policy and adjust it if necessary, focusing on 'climate adaptive forest management'..."*

*".. The Netherlands needs much more forest. Nature managers have a responsibility in this - by ensuring that the forest area they manage does not decrease, but increases. But politicians and society as a whole also have a responsibility ..."*

*"..Input former Director Dutch State Forest Management*

*Firstly, SBB (Dutch state forest management) has fallen back on the logging method for harvesting wood in combination with tillage, as if trees are an arable crop. Euphemistically, this is also referred to as rejuvenation. The clearing as a method for forest exploitation is an outdated phenomenon: deliberately abolished long ago because of the major disadvantages for the forest ecosystem. It is a national policy that kills around two thousand football pitches per year. Bare cutting leads to a sharp decrease in soil fertility, in biodiversity and in perception value. Moreover, it is climatic because it leads to a substantial increase in CO<sub>2</sub> emissions and to the conversion of climate-robust mixed forests into monocultures of mainly pine trees that are vulnerable to climate change..."*

*"..Secondly, the organization has since not only harvested logs, but also branch and top timber. This biomass harvest is a new phenomenon. It is inspired by the market that has been created for biomass since the use of biomass for the production of energy has been subsidized. Biomass harvesting is ecologically irresponsible..."*

*"..For clarity, I am not opposed to the Natura 2000 objectives. This "transformation hood", which is important for biodiversity, is in principle not in question here. However, various groups have signaled improper use of the Natura 2000 scheme, for example that more is being cut than is necessary..."*

*"...SBB has an exemplary role as the country's largest government-affiliated forest manager. I see a worrying oil spill effect from their method of clearing to municipalities, road authorities, private individuals and some other site managers..."*

*"...Input Dutch forest management and nature conservation*

*Disadvantages of clear-cut exploitation:*

- 1. build-up of long-term financial debt;*
- 2. loss of the next-generation forest already established spontaneously;*
- 3. reduction of climate robustness;*
- 4. loss of biodiversity;*
- 5. reduction in the amount of bound CO<sub>2</sub>;*
- 6. loss of soil fertility;*
- 7. loss of forest aesthetics..."*

*"...Advice:*

- stop subsidy for exploitation that destroys the forest ecosystem and leads to losses;*
- stop unnecessary mobilization of CO<sub>2</sub> and mineral loss due to soil tillage;*
- stop subsidies for biomass that should remain in the forest ecosystem..."*

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## EU RED-2 Revisions Put Biodiversity at Risk

[2018-08-28-flinders-university-eu-renewable-energy-directive-revisions-put-biodiversity-at-risk-english.pdf](#)

This report commissioned by Flinders University discusses the RED II legislation and states it will undermine the sustainability requirements and the risks for biodiversity.

*"...RED II is an immense step in the wrong direction for biodiversity and we strongly recommend that it be revised immediately. It undermines the already weak sustainability requirements for forestry and opens the door for indirect effects within the EU bioenergy market selling compliant wood to larger plants and non-compliant biomass to smaller plants..."*

*"The revisions outlined in RED II would apply only to areas considered agriculture and no longer encompass forestry. Instead, new management rules that lack adequate safeguards have been added, so biomass harvested in forests could now legally be sold as a 'sustainable' product in Europe,"*

*"...Other additions include inefficient measures for biodiversity protections in terms of forestry management. The new land-use criteria focusing on carbon safeguards won't be effective for many reasons..."*

*"...Under the proposed revisions published on June 2018 the 'RED II' legislation around 75% of wood energy being sold in EU would not have to comply with sustainability requirements..."*

*"...There is an exemption on importation guidelines and a complete lack of regulation surrounds the process of conversion to agricultural land..."*

*"...Red II also undermines the protection of highly biodiverse grasslands, with only non-natural lands identified by a 'competent authority' protected..."*

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## Heat from Burning Wood

[2014-03-03-bvor-warmte-uit-hout-dutch.pdf](#)

This report was commissioned by multiple woodlogging companies to determine the most effective method for producing woodchips for burning biomass.

*"...With the increasing demand for biomass for energy production, the social debate about the sustainability of that biomass is also increasing. Where the discussion takes place initially focused on biofuels for road traffic, made from edible crops like maize and palm oil, now also solid biomass for electricity production is emphatically present in the interest. Social groups and others fear that increasing use of biomass leads to more deforestation, loss of biodiversity and competition between the use of biomass for energy and for other purposes. As indicated in 2.3.1, the subject is also stated "Carbon debt" is in the spotlight. Although the discussion occurred to an important extent focuses on voluminous biomass flows from abroad (for example wood pellets from Canada), Dutch biomass flows are also considered critically. That is also the case for wood from nature, forest, landscape and landscaping..."*

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## Dutch Government (RVO) Bio Energy Input Woody Biomass

[2013-08-07-rvo-bio-energie-input-houtige-biomassa-dutch.pdf](#)

This report of the Dutch Government discusses the absence of sustainability & durability requirements for the logging and burning of woody biomass.

*"...Requirements for sustainability:  
In the future, in addition to quality requirements, requirements may also be imposed on the sustainability of the so-called solid biomass..."*

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