

# ANNUAL REPORT 2025















www.biofuelwatch.org.uk

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### **About Biofuelwatch**

#### **Our Mission**

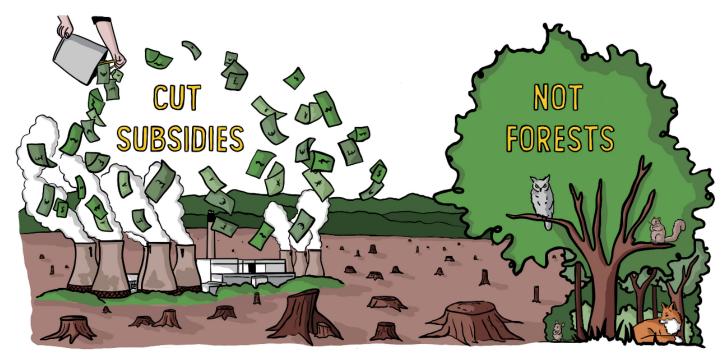
Biofuelwatch provides systemic analysis based on secondary and occasionally primary research and undertakes advocacy and campaigning in relation to the climate, environmental, human rights and public health impacts of large-scale industrial bioenergy.

#### History

Biofuelwatch was founded in the UK in 2006 and expanded to the US in 2008. The organisation began with a dedicated campaign against EU biofuel targets, followed by opposition to proposed US biofuel policies. We worked as part of an international network of organisations challenging these targets due to their anticipated—and now evident—negative impacts on forests, climate, land rights, and food sovereignty. From the outset, we raised the alarm about the consequences of creating an unprecedented additional demand for crops and wood for energy. While

we were unable to prevent these policies from being implemented, we helped set in motion a sustained resistance that has continued for over 15 years.

Within our first two years, we evolved from a purely volunteer-run UK group to a UK-US organisation, welcoming our first funded staff member. Since 2010, our focus has increasingly turned to the expansion of large-scale wood bioenergy, while we have continued to work on liquid biofuels and other bioenergy technologies.



Between 2008 and 2012, we led a highly successful UK campaign against burning palm oil and other liquid biofuels for heat and power. Today, no palm oil is burned for energy in the UK. This campaign combined community outreach and resistance to

proposed biofuel power and heat plants with national advocacy against subsidies for this form of energy. It became a blueprint for our subsequent work opposing biomass plants in the UK and across Europe.

#### Who we are and what we do

Biofuelwatch is a small but highly effective team of staff and volunteers based in the UK and the USA. Despite our size, we have a significant impact thanks to our global network of longstanding and trusted partnerships with other organisations and individuals.

We understand that meaningful change requires engagement at every level, from local communities to policymakers. Our aim is to ensure that concerns about bioenergy are fully integrated into broader climate and energy discussions, rather than treated in isolation. Collaboration is central to our mission: opposing industrial bioenergy successfully depends on working closely with climate and energy activists who are driving the transition away from fossil fuels. It is vital that bioenergy is not presented as a replacement for fossil fuels. Achieving systemic, justice-based solutions requires a holistic, strategic, and cooperative approach.

Over the years, our work has taken many forms. We conduct rigorous research into bioenergy technologies and policies, produce accessible educational materials, support community activists affected by biomass and biofuel developments, and help strengthen the capacity of other organisations. We actively participate in government and agency consultations, coordinate national and international networks, and engage with global processes such as the UNFCCC and the UN Convention on Biological Diversity. We have also served as reviewers for IPCC reports.

Biofuelwatch is recognised internationally as a key resource for critical analysis on bioenergy. Our well-referenced briefings and reports provide a solid foundation for campaigning, helping policymakers, the public, and campaigners understand the environmental and human rights implications of large-scale bioenergy.

#### Our Areas of Work: UK, EU, USA, International

UK biomass electricity	"Advanced" biofuels, including for aviation
Wood bioenergy across Europe	Genetic engineering (GE) of Trees
Divestment from large-scale wood bioenergy	New bioenergy technologies
Wood bioenergy in the USA	BECCS and Biochar

# UK Campaign Against Subsidies For Biomass Power Stations By Drax And Other Companies

This has been an exceptionally busy year for the UK campaign team, following the announcement in February by Energy Minister Michael Shanks that the Government intended to extend subsidies for Drax.

As soon as the proposed subsidy extension was announced, the UK bioenergy team mobilised rapidly. We launched an e-action calling on supporters to urge Ed Miliband not to extend subsidies for Drax, alongside a second action encouraging people to contact their MPs to oppose the subsidies in Parliament, write directly to the Secretary of State, and sign the Stop Burning Trees MP Pledge. Later that week, we organised an emergency demonstration outside the Department for Energy Security and Net Zero (DESNZ) as part of the Stop Burning Trees "Dump Drax" Day of Action, with protests taking place across the country.



In March, we organised a webinar with Global Action Plan aimed at staff working within environmental NGOs, exploring why biomass is neither renewable nor sustainable, and highlighting the serious environmental and climate harms caused by burning trees for



energy. In April, we collaborated with Dogwood Alliance, Fuel Poverty Action and Stop Burning Trees on a second webinar ahead of Drax's AGM, focused on how to protect people and the planet from Drax's tree burning. A recording of this webinar is available online.

In May, we partnered with groups including XR Edinburgh, XR York, Fuel Poverty Action, Protest in Harmony and Stop Burning Trees to organise demonstrations outside Drax's AGMs in Edinburgh and York. These actions featured Discobedience dancers dressed as trees and were intended to show solidarity with communities around the world facing severe health impacts and forest destruction as a result of Drax's operations. The demonstrations received both <u>local</u> media coverage and national coverage in <u>The</u> <u>Canary</u>.

We also joined Stop Burning Trees, Natalie Bennett and frontline community



representatives from Gloster, Mississippi, Dr Krystal Martin and Katherine Egland, for a demonstration outside Drax's AGM in London, which was covered by The Guardian. Despite travelling from the United States, Dr Martin and Ms Egland were refused permission by Drax to speak inside the AGM. Instead, they gave powerful testimonies outside, describing the devastating health impacts of Drax's wood pellet mill on their community. A video of the AGM and interviews with Dr Martin and Ms Egland are available online.

Alongside public campaigning, we worked to challenge the legislation required to enable the subsidy extension. This involved the Government reversing stricter sustainability rules introduced in 2018, which had set lower limits on supply-chain CO<sub>2</sub> emissions for electricity sources receiving renewable energy subsidies. The emissions threshold was raised specifically to allow Drax to qualify for further support. We launched an e-action urging supporters to ask their MPs to call on the Government to withdraw the legislation and encouraged direct contact with members

of the Delegated Legislation Committee responsible for voting on it.

At the committee vote in June, one Conservative and one Liberal Democrat MP spoke strongly against extending Drax's subsidies, and four opposition MPs voted against the legislation. However, with all eleven Labour MPs voting in favour, the legislation was passed.

Our engagement with the House of Lords
Secondary Legislation Scrutiny Committee
led to the issue being drawn to the special
attention of the House in a <u>formal report</u>. This
resulted in a late-night debate in the House of
Lords in June. We produced a detailed
briefing for peers, and speakers from across
the House raised serious concerns about
renewing Drax's subsidies. A recording of the
debate is <u>available online</u> (Drax debate starts
at 21.21 approx).



We are extremely grateful to everyone who contacted their MPs, members of the House of Lords and members of the Delegated Legislation Committee to oppose the subsidy extension.

In June, when North Yorkshire announced a bid to become an Al Growth Zone powered by Drax, we responded immediately. We cohosted a webinar with Friends of the Earth, Global Action Plan, Beyond Fossil Fuels and Stop Burning Trees on the environmental impacts of AI data centres and how to take action. Over the summer, we also coordinated an open letter to the Department for Science, Innovation and Technology, signed by 63 civil society organisations, calling on the Government not to approve any bid involving Drax. More recently, we launched a new e-action urging MPs to oppose Drax's Al data centre proposal, which has already enabled over 900 people to contact their MPs.

Following news that Drax was appealing a decision by the Mississippi Department of Environmental Quality that would have limited further harmful pollution from its Gloster plant,

we organised a solidarity letter with Dogwood Alliance and Stop Burning Trees calling on the State Governor to reject the appeal. The letter was signed by 85 civil society organisations. Although Drax ultimately won the appeal, the solidarity shown was deeply valued by affected communities. We extended this work by making Gloster a focus of our International Day of Action on Big Biomass, including a demonstration in Liverpool in solidarity with frontline communities in Mississippi and across the southern United States.

We also supported and took part in solidarity actions across the UK as part of the Global Day of Action coinciding with COP30. In London, our "Drax the Destroyer" banner was displayed outside Downing Street, and campaigner Pete Deane delivered a speech highlighting the ongoing harms of large-scale biomass.







# Campaigning Against Large-Scale Wood Bioenergy Across Europe

## Germany



In Germany, Biofuelwatch is actively campaigning against wood biomass power and heating plants, working closely with ROBIN WOOD, NABU (Nature and Biodiversity Conservation Union), Deutsche Umwelthilfe (German Environmental Aid), and a wide range of local environmental groups. To support and strengthen this work, we have allocated a part-time staff position and funded additional capacity through a German activist, helping to build an effective and coordinated national campaign.

Germany is a high priority for our work for three key reasons. First, it burns more wood for energy than any other EU country, at a time when its forests are under severe pressure from drought, heatwaves and bark beetle infestations. According to Germany's Fourth National Forest Inventory, published on 8 October 2024, German forests have not been a carbon sink since 2017 and have instead become a net source of CO<sub>2</sub>. This shift is attributed to unsustainable logging rates and the increasing use of wood for energy.

Second, while Germany is not yet a major importer of wood pellets, there is a significant risk that this will change if current plans proceed. Energy companies are proposing to convert large coal-fired power plants in Wilhelmshaven, Leipzig and Berlin to wood combustion. In Berlin, Schwerin and Stade, near Hamburg, new waste wood power plants are also planned. The German Federal Environment Agency has warned that if current trends continue, up to 40 per cent of

the wood burned for energy in Germany will need to be imported by 2030.

Finally, although modelling by the Federal Environment Agency suggests that biomass imports could decline in the coming years under current scenarios, new biomass power plants continue to be promoted across the country on the basis of claimed climate neutrality. This approach risks rapidly reversing any decline in imports and further intensifying pressure on Germany's forests as a source of energy.



Over the past year, our work in Germany has focused on strengthening networks, supporting local resistance and shaping public and political debate. We established contact with climate and environmental groups in cities where new biomass plants or coal-to-biomass conversions are proposed, including delivering presentations at local meetings. We coordinated the national activist network Ausgebrannt ("Burned Out"), which brings together local campaigners and national NGOs through monthly online meetings. We also supported joint campaigns by providing research-based briefings and

assisting with the development of shared materials.

We worked closely with the Bützfleth citizens' initiative in Stade-Bützfleth opposing a planned waste wood power plant, and continued to update a publicly available map of pellet plants and medium- and large-scale biomass combined heat and power facilities across Germany. Throughout the year, we issued multiple joint press releases on Berlin's proposed heat transition plans alongside NABU, ROBIN WOOD, Deutsche Umwelthilfe, BUND Berlin, PowerShift, BürgerBegehren Klimaschutz and Greenpeace Berlin.

In January 2025, we co-organised a public information event titled "Heat transition in Berlin – and what the forest has to do with it" with NABU and the Friedrichshain-Kreuzberg City Library. This was followed by a series of strategy meetings with the Berlin Renewable Energy Group to coordinate campaigning against the Reuter West and Klingenberg projects. In February, we supported an open letter from environmental groups in Cuxhaven to the city council, and in March we took part in a large NGO action outside the Bundestag on International Forest Day under the slogan "Strengthen forests, don't burn them". A joint press release followed the next day.

Further actions throughout the year included joint press work around RWE's Annual General Meeting, open letters calling for the rapid implementation of new EU rules on

wood energy into German law, and public appeals urging the city of Stade to abandon plans for a waste wood power plant in Bützfleth. In September, we co-hosted an information event in Stade examining the impacts of biomass energy, using the Bützfleth project as a case study.

On the International Day Against Large-Scale Biomass Combustion in October, coordinated actions took place across Germany, including rallies, banner drops, poster campaigns and joint press work in cities such as Stade, Leipzig, Chemnitz and Berlin. We also continued to monitor permitting developments around major biomass projects in Berlin, including the Reuter West plant, issuing joint statements with a broad alliance of environmental, climate and civil society organisations.

#### Netherlands/RWE

In the Netherlands, large quantities of imported wood pellets continue to be burned in coal power stations. Three energy companies, RWE, Uniper and Onyx, hold subsidy contracts for co-firing wood pellets with coal, and RWE has fully converted one of its two coal power stations to wood pellets. During 2024, RWE was the only company that actually burned wood pellets, using just over 1.4 million tonnes. Most of these pellets came from the United States, followed by Canada, but for the first time RWE also imported pellets from Malaysia and Vietnam.

Although RWE maintains strict secrecy around its wood sourcing, Biofuelwatch was able to trace some pellet suppliers by analysing trade data and reviewing pellet plants certified under Dutch sustainability standards, including two Malaysian producers that exported to the Netherlands last year. Desktop research uncovered evidence linking timber concessions supplying one of these plants to rainforest and peatland destruction



in Borneo, as well as serious concerns regarding wood sourcing by the other company in Pahang Province.

With the support of the <u>German Federation of</u> <u>Critical Shareholders</u>, we were able to raise these findings and questions about RWE's sourcing of Malaysian wood pellets at the company's AGM in late April.

Together with the <u>Clean Air Committee</u> in the Netherlands, <u>we submitted</u> our findings to the Dutch Emissions Authority in June, alongside a formal enforcement request for apparent violations of Dutch sustainability standards.



This enforcement request attracted media coverage in the Netherlands, and at the time of writing we are still awaiting a decision.

While awaiting the authority's response, we identified a significant issue in a report by CE Delft on compliance with Dutch sustainability criteria. The report revealed that none of the pellets burned in the Netherlands in 2024, nor in 2023, had been assessed against the Dutch biomass sustainability standards, which on paper are stricter than those applied across the EU or in the UK. This is because all pellets were classified as being made from wastes and industry residues, specifically sawmill residues, even though pellet plants known to supply RWE openly state that they also use substantial quantities of whole trees. Since the current Dutch biomass subsidy scheme began, the vast majority of wood has been classified as sawmill residues and thereby exempted from the main sustainability criteria.

This prompted further investigation into the certification scheme used by RWE, known as the Green Gold Label. This scheme was established by the Dutch energy company Essent, which previously operated the coal plants now burning biomass and was acquired by RWE in 2009. Together with the Clean Air Committee, we published a report on the Green Gold Label, which certifies biomass in the Netherlands and Japan and has been proposed for approval as an EU-wide certification scheme.

The scheme allows pellet plants using wood from forests and plantations, as well as sawmill residues, to receive certification only for the sawmill residue component of their feedstock. Responsibility is then passed to power companies such as RWE to declare that all pellets purchased are derived solely from residues, with no independent verification. Audit reports are treated as confidential and are not made public. As a result, a certification scheme founded by Essent and linked to RWE continues to enable the company to avoid scrutiny of its wood sourcing.

Together with our Dutch partners, we will continue to challenge this system and call for the immediate suspension of RWE's subsidies, which rely on this deeply flawed certification approach.

#### **Baltic States**

In January, the Croatian NGO Green Squad published a report documenting recent clearcutting and habitat destruction within Natura 2000 protected areas, which are intended to receive the highest level of conservation protection. Biofuelwatch was able to support and fund this important work thanks to a grant from the Threshold Foundation. The report has since prompted an investigation by the European Commission.

In October, <u>we published</u> a map of biomass and wood pellet plants in the West Balkans,

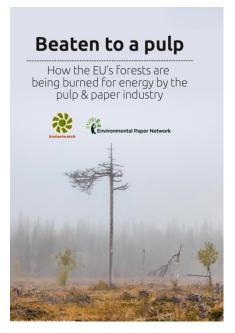


which we continue to maintain and update as new information becomes available.

In 2026, we look forward to strengthening joint work with partners across the region, particularly to challenge climate and development finance for biomass energy.

#### Biomass investments by the pulp and paper industry in Europe

Together with the Environmental Paper



Network, we published a report developed throughout 2024 and early 2025 titled "Beaten to a pulp:

How the EU's forests are being burned

for energy by the pulp and paper industry".

Case studies of biomass plants operated by the sector in Sweden, Finland, Germany, Spain and Portugal were co-published with national NGOs. Traditionally, pulp mills have burned residues such as bark and black liquor to meet their own energy needs. However, renewable energy subsidies for biomass have driven investment in much larger biomass plants that burn forest wood, with several facilities now exporting heat and electricity. Our analysis found that pulp-producing companies are the dominant force in biomass electricity generation in four of the five largest pulp-producing countries in the EU, and are responsible for over a fifth of the primary woody biomass burned for energy in those countries. These findings were presented through a joint webinar and press release.

#### Carbon offsets for BECCS and biochar

We continued to play an active role in the Real Zero Europe campaign, which strongly opposes the EU's Carbon Removals and Carbon Farming framework approved in late 2024. During 2025, methodologies for Direct Air Capture, Bioenergy with Carbon Capture and Storage and biochar were developed, although they are still awaiting final approval.

The framework establishes certification criteria for voluntary carbon offsets based on so-called negative emissions. Alongside other members of Real Zero Europe, we fundamentally oppose this approach. Carbon offsets risk legitimising continued fossil fuel use, while technologies such as BECCS remain unproven and would, if deployed at scale, intensify pressure on land and forests

due to increased biomass demand. Biochar is less technically complex, but also requires large quantities of biomass, creating further risks for ecosystems and agricultural land.

Despite rejecting the framework in principle, we worked closely with European NGO partners to develop a detailed <u>critique of the inadequate methodologies proposed for BECCS</u> and biochar.

Our central concern is that the EU is considering incorporating carbon removals under this framework into the EU Emissions Trading Scheme, the world's largest carbon trading compliance market. This would represent a significant shift in climate policy and will be a major focus of our work in 2026.

# **USA** and International

## Challenging Bioenergy Expansion in California and Beyond

State agencies and extractive industry interests in California have continued to promote bioenergy as a pathway to meeting climate objectives and reducing greenhouse gas emissions. Biofuelwatch has worked consistently to challenge this narrative,

countering proposals for the large-scale expansion of bioenergy as a climate solution and defending local communities, ecosystems and climate justice.

From the local level to the state capitol, we



have raised the alarm about flawed climate planning processes and ill-conceived bioenergy megaprojects, helping to motivate public engagement in critical decision-making on biomass and biofuels. One notable example was our work in the California State

Legislature, where we supported an ad hoc coalition of environmental justice organisations to oppose a bill that would have exempted so-called "sustainable aviation fuel" (SAF) refineries from environmental review.

Biofuelwatch played a central role at a time when many allied organisations were already stretched beyond capacity. We identified the bill at introduction, helped draft opposition letters, tracked its progress, engaged with committee staff, and provided testimony at hearings. By generating sustained scrutiny and opposition, we helped ensure that, despite early momentum, the bill ultimately failed in committee.

Alongside this legislative work, Biofuelwatch was also central to a major and internationally significant campaign that resulted in Drax abandoning its plans to establish an exportoriented wood pellet industry in California.

Through a proxy company, Golden State Natural Resources, Drax had sought permits for two large pellet mills and a storage and export terminal at the Port of Stockton, intended to supply up to one million tonnes of wood pellets annually to global energy markets.

An unprecedented coalition of organisations

— urban and rural, local and national —
came together to challenge the flawed
environmental review process and highlight

the predictable social, environmental and climate harms of introducing the wood pellet industry to California. The proposed facilities would have required more than US\$500 million in investment and would have been the largest timber industry manufacturing plants built in the state for decades.

Biofuelwatch played a key role in bringing national and international media attention to the proposal. Over the year, as awareness of the risks grew, decision-makers increasingly distanced themselves from the project. In June, Golden State Natural Resources announced that it was abandoning the scheme. Biofuelwatch joined partners in celebrating the successful defeat of Drax's ambitions to access what it described as California's "fibre basket".

This victory extended far beyond California.

Support from organisations across the US and internationally was crucial. For Biofuelwatch, participation in a delegation to Japan in September and October 2025 underlined the global significance of the campaign. Working alongside partners in Japan made clear how disrupting Drax's West Coast expansion plans had implications for biomass markets supplying Asia.

Connections between our work in the UK, solidarity with partners in the south-eastern US, collaboration with allies in British Columbia and beyond coalesced into a single, shared story of mission-driven

advocacy to protect communities and forests from an aggressive global biomass industry.

Nevertheless, significant challenges remain.
The rapid growth of liquid biofuels continues, with converted refineries in California sourcing feedstocks from around the world, including regions at high risk of deforestation in South America and South-East Asia.
Biofuelwatch has continued to expose the

illusory emissions reductions associated with liquid biofuels such as "renewable diesel", and evidence of the harms linked to feedstocks like soy and animal tallow continues to mount. While the sector's expansion has not yet peaked, we enter the coming year better prepared than ever to challenge it, building on a strong foundation laid across the US, the UK and internationally.

#### Strengthening Our Biofuels Campaign: Pax's First Year

In May, we were delighted to welcome our new Biofuels Campaigner, Pax, whose role was made possible through generous donor support. Pax's work focuses on biofuels used in road transport, aviation and shipping, as well as home heating and power generation, significantly strengthening Biofuelwatch's capacity in this rapidly expanding policy area.

Since joining the team, Pax has prioritised relationship-building, coalition work and campaign development. They delivered a workshop at Climate Camp Scotland on the future of the Grangemouth oil refinery, attended the Stay Grounded Network's Beyond Aviation conference, and produced briefings on the use of hydrotreated vegetable oil (HVO) in UK local authority vehicle fleets and on bioenergy power generation in Ireland.

Pax has also supported international advocacy, collating testimony and footage from frontline communities to inform lobbying

of the International Maritime Organisation against the promotion of biofuels, and coorganising a demonstration outside IMO offices. They submitted evidence to the UK Government on the proposed SAF Mandate, undertook media training with the New Economy Organisers Network, and authored an op-ed for the industry publication Supply Chain Brain.



Throughout the year, Pax built connections with campaign groups across the UK and Ireland, as well as in Europe, South America and Asia. They concluded the year working

around COP30, where Brazil promoted a major expansion of biofuels through the 'Belém 4X' pledge, drawing on its ethanol sector and broader "bioeconomy" strategy.

Pax was interviewed by the Financial Times on the implications of this agenda for ecosystems and communities; publication is forthcoming.

#### International Campaign Leadership and Strategic Collaboration

Alongside this expanding campaign work,
Rachel has continued to provide part-time
strategic support across the organisation. Her
contributions include fundraising assistance,
supporting the recruitment of Pax, editorial
input, strategy development and a range of
organisational support.

to advocate for strong language on SAF in shared briefings.

She continues to serve on the steering committee of the Campaign to Stop GE

Trees, recently helping to produce a newly released film on the non-GMO restoration of the American Chestnut. Rachel also serves

# Whistleblowers reveal profound failure of ISCC to implement biofuel "sustainability standards"



on the board of directors of Standing Trees and submitted formal comments to the US Forest Service on proposed logging projects in the north-eastern United States.

Rachel worked closely with two whistleblowers to prepare and publish a major briefing exposing failures in ISCC "sustainability" standards, and provided support for several other briefings completed during 2025. She also engaged extensively with the Stay Grounded coalition, particularly

During the year, she provided resources and support to a citizen group in Vermont opposing a proposed biomass pyrolysis and biochar facility. In collaboration with the North American chapter of GAIA, she also initiated an event to raise awareness of the risks associated with biochar, in response to several large-scale proposals, particularly in Canada

# Our Team and Supporters

#### Staff



Almuth Ernsting (Co-Founder/ Co-Director & European Campaigns)



Gary Graham Hughes (Co-Director & Americas Program Coordinator)



Katy Brown (UK Bioenergy Campaigner)



Sally Clark (UK Campaigns)



Henna Cheema
Co-Director &
Camaigns Support



Rachel Smolker (USA Campaigns)



Pax Butchart (Biofuel Campaigner)

#### Volunteers

We are grateful for the energy and creativity of numerous volunteers who have helped enormously over the years in too many ways to list. With special thanks to Pete Deane (Co-Director) | Deepak Rughani (Co- Founder) | Rebecca Warren (Treasurer) | Robert Palgrave | Maryla Hart | Jack Spruill | James Hewitt | Duncan Law | Fran Howe | John Ackers | Frances Howe | Merry Dickinson | Elizabeta Senjung | Lucie Wuethrich

## Supporters

Biofuelwatch is grateful to all who have supported us over the years. Our recent institutional supporters include Packard Foundation, Swift Foundation, NRDC, Patagonia, Moore Charitable Foundation, Threshold Foundation, CS Fund, Clif Family Foundation, GEKKO Foundation and a generous anonymous donor. We are especially appreciative of the individuals who have made generous gifts to our work. Nothing that we do would be possible without Global Justice Ecology Project, our fiscal sponsor in the USA. Thank you to everyone for your support!

#### Support our work

For information about funding our work please contact us at biofuelwatch@gmail.com. If you would like to make a donation please visit our website <a href="www.biofuelwatch.org.uk/donate/">www.biofuelwatch.org.uk/donate/</a> To set up a regular payment using your electronic banking (UK):

Sort Code: 08-92-99

Account Number: 65270105 (The Cooperative Bank, business account)

Account Name: Biofuelwatch

For donations from outside the UK: IBAN number: GB51CPBK 089299 65270105

Swift Code: CPBK GB22

(Please use your email address as a reference so we can track donations)

# Stay Connected

