

November 14th 2018

Dear Secretary Michael Regan:

We are very concerned about the climate, biodiversity and environmental justice impacts of the proposed expansion of Enviva's wood pellet facilities in North Carolina, starting with the Richmond County (Hamlet) plant, to which we have been alerted by the Dogwood Alliance. As residents of the UK, the country that gives Enviva the most custom, we feel compelled to contact you directly and urge you not to allow Enviva to expand its pellet operations in these areas.

Enviva's customers in the UK include Drax Power Station (Enviva's largest customer, and the world's largest burner of biomass); Lynemouth Power Station, which finished its conversion from burning coal to biomass this year; and MGT Teesside Power Station, the world's largest purpose-built biomass power station which is still under construction. 59% of Drax's 6.5 million tonnes of pellets a year come from the southern US, and Enviva is its main supplier there. Lynemouth and MGT have contracts with Enviva for around 2 million tonnes of wood pellets a year between them – the equivalent of nearly 4 more Hamlet pellet plants. We are campaigning for the closure of all these power stations and for them to be replaced with genuinely renewable energy. This will benefit everyone because of the reduced risk from climate change, and specifically local people in North Carolina who are currently feeling the adverse impacts of the biomass supply chain.

Numerous scientific studies¹ have confirmed that burning trees for electricity is at least as **bad for the climate** as burning coal, and that standing forests are the best carbon sink we have. According to a letter from 800 scientist to the EU Parliament during the negotiation of the new Renewable Energy Directive:

*'Even if forests are allowed to regrow, using wood deliberately harvested for burning will increase carbon in the atmosphere and warming for decades to centuries as many studies have shown even when wood replaces coal, oil or natural gas. The reasons are fundamental and occur regardless of whether forest management is "sustainable".'*²

We urgently need to reduce our carbon emissions and protect forests to have any hope of remaining within 1.5 degrees of global warming. Any expansion of the wood pellet industry will drive increases in logging and the conversion of natural forests to tree plantations, which sharply conflicts with North Carolina's commitment and responsibility to act on climate change.³

On top of the well-documented impacts on the climate, the wood pellet industry **threatens communities**, including those already disadvantaged by **industrial pollution and social inequality**, and **biodiversity**. While the pellet industry has grown rapidly in the last ten years, insufficient attention has been paid to its social impacts.

Industrial-scale production of wood pellets emits harmful particulates, volatile organic compounds and other hazardous pollutants. Repeated air quality violations have been documented in the wood pellet industry in America's South, particularly at Enviva's North Carolina facilities⁴. These emissions disproportionately harm

1 See <https://www.biofuelwatch.org.uk/biomass-resources/resources-on-biomass/> for links to relevant scientific studies and reports.

2 https://www.dropbox.com/s/l8sx5bl0h02x395/UPDATE%20800%20signatures_Scientist%20Letter%20on%20EU%20Forest%20Biomass.pdf?dl=0

3 <https://governor.nc.gov/news/north-carolina-joins-14-states-bipartisan-us-climate-alliance>

4 <https://www.environmentalintegrity.org/wp-content/uploads/2017/02/Biomass-Report.pdf>

communities of colour, low-income communities and those already impacted by other polluting industries, such as those in Dobbins Heights and Hamlet.

Biofuelwatch supports the Dogwood Alliance's call for NC DEQ to restart the process of issuing Enviva's permit only after doing a full Environmental Justice analysis, and to ensure that any operations comply with the Clean Air Act. This process must be informed by the DEQ Environmental Justice Advisory board, with leadership and input from the impacted community.

Years of investigation⁵, backed up by industry data, have documented that Enviva sources whole trees from the Mid-Atlantic Coastal Ecoregion. These forests are **ecologically important, sensitive ecosystems**, home to a number of rare and endangered species as well as providing vital flood control. The plantations that often replace them provide neither habitat nor flood protection.⁶

According to an article by International Water Resources Association, forests are vital in helping to **prevent or reduce flooding**, such as what occurred after Hurricane Florence. However:

“This is not necessarily the case for plantation forests, particularly where no natural understory of vegetation is maintained or where management activities involving site preparation, cultivation, drainage, road construction, and logging may have detrimental effects.”⁷

Taking forests away from these already disadvantaged communities means they are less resilient to flooding.

According to a 2017 report on **Biodiversity and Biomass** by the Southern Environmental Law Centre:

“Biomass sourcing... 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.”⁸

Species relying on these forests include the three-lined salamander, black bear, red wolf and a number of bird species.

Burning biomass also negatively impacts on **air quality** in the countries where it is burnt: research by Biofuelwatch in 2017 revealed that since starting its partial conversion to biomass, Drax Power Station's emissions of small particulates (PM₁₀) more than doubled.⁹ So having contributed to air pollution and environmental injustice in the place where they are made, the wood pellets continue this trail when they are burnt on the other side of the Atlantic.

Halting the wood pellet industry is a vital part of the emission reduction and forest protection we need if we are to have any chance of staying within 1.5 degrees of global warming. In the UK, people are campaigning against continued government subsidies for biomass electricity and for biomass electricity to be replaced with genuinely renewable alternatives. If these campaigns continue to build on recent successes¹⁰, subsidies for biomass electricity may dry up sooner than anticipated, leaving Enviva and Richmond County with wood pellet facilities (and the depleted forests and air pollution that accompany them) but a vastly reduced pellet export market. A more prudent investment would be one that benefits the local community and ecology rather than damaging them.

5 https://www.dogwoodalliance.org/wp-content/uploads/2017/05/NRDC_2014-2017Booklet_DigitalVersion-resize.pdf

6 <http://pulse.ncpolicywatch.org/2018/09/26/forests-help-control-floods-reduce-effects-of-climate-change-unless-theyre-ground-up-and-burned-for-fuel/>

7 <https://pdfs.semanticscholar.org/dabb/b129c0c4b7c811745843ccabe72a5f8686de.pdf>
<http://pulse.ncpolicywatch.org/2018/09/26/forests-help-control-floods-reduce-effects-of-climate-change-unless-theyre-ground-up-and-burned-for-fuel/>

8 https://www.southernenvironment.org/uploads/publications/Biomass_Biodiversity_white_paper.pdf

9 <http://www.biofuelwatch.org.uk/2017/briefing-draxs-coal-to-biomass-conversion-increases-levels-of-dangerous-small-particles/>

10 <https://www.biofuelwatch.org.uk/2018/cfd-press-release/>

We therefore urge DEQ to:

1. Initiate a study to assess the cumulative impacts of the wood pellet industry, and halt expansion of the industry until such study is completed;
2. Modify the Enviva Hamlet permit to enforce reductions in production and emissions; and
3. Perform a full EJ analysis, with the results incorporated into the modified permit for the Enviva Hamlet facility.

We look forward to hearing from you

Frances Howe

on behalf of Biofuelwatch