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(I look forward to receiving evidence-based scientific research rebuttals to share with the Interest Group. Rich)

# LOUISIANA ILLUMINATOR

## As Louisiana doubles down on biomass, Europe cools on alternative energy source

EU recommendations could limit market for wood pellets produced in southern U.S.

BY: [RACHEL MIPRO](#) - JUNE 14, 2022 2:36 PM



The Morehouse BioEnergy wood pellet plant in north Louisiana. State leaders are promoting investment in biomass while its largest consumer, nations in Europe, consider moving away from the alternative fuel source. (Photo by Rachel Mipro/Louisiana Illuminator)

Louisiana is pivoting toward green energy, a notable move for a state historically steeped in fossil fuels. But environmental activists are skeptical about whether some options being touted will be the state's way forward.

Biomass, renewable organic energy that comes from plants and animals, has been championed in Europe for the past few decades as a source of green energy. Wood pellets made from biomass are harvested and



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manufactured in the southern United States and then transported to countries, much of it to the United Kingdom, that burn them for energy.

The European Parliament's environment committee recently made [strong recommendations against burning biomass](https://news.mongabay.com/2022/05/eu-parliaments-environment-committee-urges-scale-back-of-biomass-burning/) from forestry (<https://news.mongabay.com/2022/05/eu-parliaments-environment-committee-urges-scale-back-of-biomass-burning/>). Under new definitions, most woody biomass would no longer be considered a renewable resource and would not count toward renewable energy incentives or be subsidized under the European Union's Renewable Energy Directive. The EU will make the final decision on biomass burning in September. If the decision goes through, the biomass market in Europe will be significantly reduced, leaving the booming biomass industries in the southern U.S. without a key customer base.

While Europe is loosening ties to the industry, Louisiana officials want to double down on biomass as a carbon-neutral alternative to the oil and gas industries. In Louisiana, where logging and forestry make up a large chunk of state industry, there are four wood pellet plants. Forestland covers almost 50% of the state, making timber its biggest agricultural crop that generates more than \$14 million in timber severance taxes each year, according to the Louisiana Forestry Association. Environmental activist Dean Wilson, executive director for Atchafalaya Basinkeeper, said Louisiana's biomass industry hasn't been as exploitative as in other states, but he still has doubts about the practice in general. "I'm still very concerned about the idea of using wood for power because I fight lack of enforcement and corruption all the time," Wilson said. "There's the risk we're going to start burning all the forests on the planet."

#### Lawmaker sees Louisiana at biomass 'forefront'

State Rep. Jack McFarland, R-Jonesboro, says sustainable forestry and best management practices in the state would prevent excessive deforestation. McFarland, president of [his family's timber business](https://mcfarlandtimber.com/) (<https://mcfarlandtimber.com/>), insists that harvesting biomass is environmentally friendly. [House Bill 708](https://legis.la.gov/Legis/BillInfo.aspx?i=242517) (*attached*) (<https://legis.la.gov/Legis/BillInfo.aspx?i=242517>), which McFarland authored this past legislative session, declares bioenergy produced from forest products and agricultural harvests renewable and carbon neutral. The Legislature unanimously approved the proposal, and the governor signed it into law earlier this month. It goes into effect Aug. 1.

Under the new law, biomass would include trees left over from harvest, harvested trees that are considered to be poor quality and trees felled by extreme weather events and natural disasters, among others.

Bagasse, the byproduct of sugarcane processing, would also be included as a source of bioenergy, expanding the range of materials that would be classified as carbon neutral and renewable in the state.

"We are at the forefront in Louisiana because of all the clean energy technologies that's being pushed to be less dependent on fossil fuels," McFarland said. "So my goal was to define biomass as it relates to the renewable energy act but also to demonstrate that we have all these residuals that companies are already using in the facilities to manufacture paper, wood, plywood, all these wood and paper products."



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Despite EU recommendations against biomass, McFarland believes there will still be a strong market for biomass in Europe.

“You have two options: you can utilize fossil fuels or you can utilize a renewable resource like timber,” McFarland said. “They don’t have the ability, nor do we, to generate the power and energy to run their country just off of wind and solar.”

### Is it really carbon neutral?

Gov. John Bel Edwards has repeatedly emphasized his commitment to increasing Louisiana’s production of renewable energy, including biomass. He attributes the impact of worsening hurricanes and severe weather events to climate change and has posited that green energy is the state’s way out. Edwards first launched the Climate Initiatives Task Force in 2020, with the goal of achieving net zero greenhouse gas emissions in the state by 2050. Some efforts put forward by Edwards have come under fire for not actually being carbon neutral. Biomass, in particular, has sparked international outcry, with critics saying that burning it releases more carbon dioxide into the atmosphere than is captured and contributes to deforestation in southern states. David Carr, a senior attorney with the Southern Environmental Law Center who specializes in alternative energy and biomass issues, said the UK’s largest power provider, Drax, was especially harmful in terms of woody biomass consumption.

Drax, which owns biomass pellet plants in Morehouse and LaSalle parishes, harvests wood in Louisiana and Mississippi and ships its products to Europe through the Port of Baton Rouge. According to [carbon life-cycle reports](#) (*attached*) the Southern Environmental Law Center and the National Wildlife Federation commissioned, emissions from burning wood pellets made at Drax mills will increase carbon pollution in the atmosphere for more than 40 years.

Carr said Drax consumed 8.4 million tons of wood pellets in 2021, more than half of which came directly from forests. “We’ve estimated that Drax’s demand is requiring the cutting down of roughly 176 square miles of forest every year,” Carr said. “The burning of the wood pellets releases more carbon into the atmosphere than burning coal. That doesn’t even count the CO2 emissions from harvesting the wood, transporting it to the pellet mills, processing it, shipping it to the ports, shipping it to the EU and UK.”

Despite pushback against the practice, the biomass industry in Louisiana stands to be bolstered by the governor’s Louisiana Climate Action Plan. One aspect of the plan the Climate Initiatives Task Force released in February relies on Louisiana biomass for carbon sequestration. The plan says the state agriculture and economic development agencies should “encourage use of Louisiana forest products — lumber, plywood, paper, wood pellets, and biomass — in state capital projects and other construction projects. Cognizant of Louisiana’s forestry resources and markets, it is recommended that outreach to foresters, manufacturers, and end users begin immediately for this transition to be effective.” But Carr

says relying on biomass as a renewable energy source is not a sustainable solution. “The scientific community, there’s a pretty good consensus that burning trees for power is a bad idea in terms of increasing climate change,” Carr said. “Makes it worse instead of better.”



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# ACT No. 275

2022 Regular Session

HOUSE BILL NO. 708

BY REPRESENTATIVES MCFARLAND, BAGLEY, CARRIER, FIRMENT, FISHER, GADBERRY, HARRIS, HODGES, HORTON, LARVADAIN, MCMAHEN, ORGERON, RISER, ROMERO, SCHAMERHORN, SCHEXNAYDER, ST. BLANC, THOMPSON, AND WHITE

1 AN ACT

2 To enact R.S. 51:3061(3) and (4) and 3062(6), (7), and (8), relative to the Louisiana  
3 Renewable Energy Development Act; to provide for legislative findings; to define  
4 the term "biomass"; and to provide for related matters.

5 Be it enacted by the Legislature of Louisiana:

6 Section 1. R.S. 51:3061(3) and (4) and 3062(6), (7), and (8), are hereby enacted to  
7 read as follows:

8 §3061. Legislative findings

9 The legislature hereby finds and declares that:

10 \* \* \*

11 (3) Energy produced from forest products' manufacturing bioenergy  
12 feedstocks shall be considered renewable and carbon neutral. When paired with  
13 carbon capture technologies, known as bioenergy with carbon capture and storage,  
14 it may be considered carbon negative.

15 (4) Energy produced from agricultural harvesting, including bagasse  
16 produced from sugarcane processing shall be considered renewable and carbon  
17 neutral. When paired with carbon capture technologies, known as bioenergy with  
18 carbon capture and storage, it may be considered carbon negative.

19 §3062. Definitions

20 As used in this Chapter, the following words ~~and phrases shall have the~~  
21 ~~meaning ascribed to them in this Section, unless the context clearly indicates~~  
22 ~~otherwise:~~ have the following meanings:

23 \* \* \*

1                   (6) "Biomass" means forest products' manufacturing bioenergy feedstocks,  
2                   which may include but not be limited to the following:

3                   (a) Forest products' manufacturing residuals, including but not limited to  
4                   spent pulping liquors, pulping by-products, woody manufacturing residuals, paper  
5                   recycling residuals, wastewater and process water treatment plant residuals, and  
6                   anaerobic digester biogas.

7                   (b) Harvest residues, including trees or portions of harvested trees that are  
8                   too small or of too poor quality to be utilized for wood products or paper products.

9                   (c) Downed wood from extreme weather events and natural disasters,  
10                  nonhazardous landscape or right-of-way trimmings and municipal trimmings, and  
11                  plant material removed for purposes of invasive or noxious plant species control;  
12                  biowaste, including landfill gas.

13                  (d) Forest biomass derived from residues created as a by-product of timber  
14                  harvesting, including but not limited to low-value wood, treetops, and tree limbs.

15                  (e) Forest management activities conducted for stand improvement or to  
16                  increase yield, ecological restoration, or to maintain or enhance forest health  
17                  including but not limited to hazardous fuels reduction.

18                  (f) Biomass materials recognized by the United States Environmental  
19                  Protection Agency as fuels under 40 CFR Part 241.4.

20                  (g) Other used wood products, such as crates or pallets.

21                  (7) "Sugarcane" bagasse biomass" or "bagasse biomass" means the solid,  
22                  heterogeneous, fibrous agricultural waste that remains after extracting the liquid  
23                  from sugarcane stalks, which may include but is not limited to the following:

24                  (a) Biomass derived from factory bagasse which is obtained from the  
25                  industrial extraction process and contains only trace amounts of the sugarcane liquid.

26                  (b) Biomass derived from pressed cane stalks or farm bagasse which is  
27                  obtained from on-farm or small factory extraction and contains higher amounts of  
28                  sugarcane liquid.

1                   (c) Dewatered pulp derived from bagasse and recognized by the United  
2                   States Environmental Protection Agency as fuels under 40 CFR Part 241.4.

3                   (8) "Bioenergy with carbon capture and storage" means the process of  
4                   capturing and permanently storing carbon dioxide from biomass energy generation.

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SPEAKER OF THE HOUSE OF REPRESENTATIVES

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PRESIDENT OF THE SENATE

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GOVERNOR OF THE STATE OF LOUISIANA

APPROVED: \_\_\_\_\_

# FACT SHEET

## New Report Shows Wood Pellets from Drax’s U.S. Mills Increase Carbon Emissions During the Timeframe Necessary to Address Climate Change

IN OCTOBER 2018, the United Nation’s Intergovernmental Panel on Climate Change (IPCC) issued a report warning that global carbon dioxide and other greenhouse gas emissions must be cut in half within the next 12 years (i.e., by 2030) to keep global warming to 1.5 degrees and avoid the most dangerous effects of climate change.<sup>i</sup> Meanwhile, under the guise of reducing its carbon profile, the UK’s largest power provider—Drax Power Station—has increased its reliance on burning woody biomass for electricity, a process which has resulted in over 56 million tonnes of carbon dioxide being emitted from Drax’s smokestacks over the last five years.<sup>2</sup>

A new report by Spatial Informatics Group, LLC (SIG), commissioned by the Southern Environmental Law Center and the National Wildlife Federation, takes a closer look at the carbon profile of wood pellets produced at Drax’s three U.S. wood pellet mills.<sup>3</sup> Building on previous studies, SIG conducted a carbon life-cycle assessment tailored to Drax’s presumed wood sourcing for these mills.<sup>i</sup> SIG found that the accumulated emissions of burning wood pellets from these mills to produce electricity in the UK increases carbon pollution in the atmosphere for more than 40 years,<sup>ii</sup> well beyond the timeframe identified by the IPCC as critical for carbon reduction.

This new analysis puts the final nail in the coffin of Drax’s clean energy claims. The presumed sourcing for Drax’s mills represents what Drax and others in the industry have portrayed as “best practices” for biomass sourcing—trees from thinnings<sup>iii</sup> of pine plantations. To date, the impacts of wood pellets from Drax’s mills have not been well understood. The results of the SIG analysis demonstrate that even under these most generous assumptions, Drax’s biomass conversions are a false climate solution, increasing atmospheric carbon well beyond 2059.

Moreover, SIG’s analysis represents only a small portion of Drax’s overall climate impact from burning biomass. Drax sources most of its wood pellets from other companies, including Enviva Pellets, the largest wood pellet manufacturer in the world. Years of on-the-ground investigations have documented the unsustainable sourcing practices used to supply Enviva’s mills, such as clearcutting bottomland hardwood forests.<sup>4</sup> The investigations have also repeatedly shown whole trees and other large-diameter wood entering Enviva’s—and therefore Drax’s—supply chain. These are known to be the most carbon-intensive sources of biomass.

## MAIN RESULTS

### **Drax’s own wood pellets increase carbon in the atmosphere for over 40 years, worsening climate impacts.**

Burning wood pellets from Drax’s mills for electricity in the UK increases carbon dioxide concentrations in the atmosphere for well over 40 years when compared to the emissions profile of either the UK’s 2018 electricity grid mix or the UK’s targeted electricity grid mix for 2025.<sup>iv</sup> Carbon parity—or the time at which the accumulated carbon emissions from Drax’s own wood pellets equals the baseline scenarios without bioenergy—was not reached over the 40-year period SIG modeled.

<sup>i</sup> Phase I research indicated that Drax’s mills currently source predominately from softwoods, mainly trees from pine plantation thinnings, with additional feedstock from sawmill residues and a small percentage of hardwoods. As discussed below, SIG’s analysis is conservative and made several assumptions favorable to Drax, mainly the exclusion of hardwoods and the over inclusion of sawmill residues. Note that any future changes to Drax’s sourcing or competing demands for wood in the region will likely impact the carbon life-cycle assessment for Drax’s wood pellet mills.

<sup>ii</sup> SIG modeled for 40 years, from 2019 to 2059.

<sup>iii</sup> Thinning is the process of selectively removing whole trees from a plantation in order to maintain a specific volume of trees per acre and prevent overcrowding. Thinning may occur at multiple phases of growth in the plantation stand and can therefore include trees of various ages (generally, 15 to 30 years) and sizes, including tall, large-diameter whole trees. Pine plantations are eventually clearcut in a final harvest before being replanted.

<sup>iv</sup> The UK’s electricity grid emissions profiles represent cumulative carbon emissions, measured in megagrams of carbon dioxide equivalents per megawatt hour (Mg CO<sub>2e</sub>/MWh).



## **Even under a generous assumption of 50% sawmill residues, Drax’s own wood pellets do not reach carbon parity within 40 years.**

Although Drax’s mills currently consume less than 20% sawmill residues,<sup>v</sup> (i.e., over 80% trees), SIG modeled the Drax LaSalle mill at 50% sawmill residues to reflect the expected future feedstock mix from operation of a co-located sawmill. Even under this extremely generous feedstock mix assumption, pellets from the LaSalle mill still did not reach carbon parity within 40 years.

## **The climate impact of Drax’s own wood pellets is far worse than genuine renewables like solar and wind.**

To understand the carbon life-cycle emissions impacts of burning wood pellets, such emissions must be compared against genuine zero-emission, no-burn renewable energy sources, such as wind and solar, rather than fossil fuels. The life-cycle emissions profile for wind and solar in the UK’s grid mix are 0.011 Mg CO<sub>2e</sub>/MWh and 0.048 Mg CO<sub>2e</sub>/MWh, respectively. In comparison, SIG’s analysis found that the lowest emissions intensity for biomass electricity generated using wood pellets from Drax’s pellet mills was roughly 0.468 Mg CO<sub>2e</sub>/MWh—ten times that of solar—and even that was not until the end of the 40-year time period (2059). The UK’s renewable energy subsidies, however, treat biomass as a non-emitting energy source on par with wind and solar.

## **Drax’s own wood pellets are worse for the climate whether or not its sourcing practices are considered “sustainable.”**

Drax often conflates the term “sustainable” with the climate impacts of burning wood pellets. Accordingly, Drax touts its sourcing practices as coming from “sustainable managed working forests”—i.e., pine plantations where growth exceeds harvests. As demonstrated by SIG’s report, regardless of whether growth exceeds harvests, wood pellets from Drax’s own mills are still bad for the climate for well over 40 years.

## **BACKGROUND**

Over the past eight years, the southeastern U.S. has become ground zero for a rapidly expanding wood pellet industry. Wood pellets, which are manufactured by drying and compressing wood into small pellets, are being exported to Europe at an alarming rate where they are being burned for electricity. Based on the false assumption that burning wood for electricity is carbon neutral, many European governments, led by the UK, are incentivizing such practices by providing large subsidies for new or converted biomass facilities.

One of the main beneficiaries of these subsidies is Drax Power, a large biomass and coal-fired power station in the UK, which received £789.2 million in subsidies in 2018 alone.<sup>5</sup> That same year, Drax imported over 4.4 million tonnes of wood pellets from the southeastern U.S.<sup>6</sup> This equates to over 32,500 hectares (325 km<sup>2</sup>) or 80,300 acres (125 mi<sup>2</sup>) of U.S. forests that were harvested in 2018 alone to supply wood pellets for Drax.<sup>7</sup>

## **DRAX BIOMASS**

To distance itself from the destructive sourcing practices and resulting carbon impact of Enviva’s wood pellets, Drax appears to downplay the carbon impact from burning Enviva’s wood pellets and instead attempts to shift the focus to Drax’s own wood pellet mills. Drax Biomass, a subsidiary of Drax Power, owns and operates three wood pellet mills in the southeastern U.S. Two of the mills (Drax Morehouse and Drax LaSalle) are located in Louisiana, while a third (Drax Amite) is located in Mississippi. Combined, these mills have a production capacity of 1.5 million metric tonnes per year of wood pellets.<sup>8</sup>

Drax continues to receive a large portion of its U.S. wood pellet supply from Enviva,<sup>9</sup> with the carbon emissions of burning such pellets analyzed at 3.4 times higher than continued use of coal over 100 years.<sup>10</sup> However, to date the impacts of wood pellets from Drax’s mills have not been well understood. To evaluate the sourcing practices and resulting carbon impact of Drax’s wood pellets, SIG approached its study in two phases.

### **Phase I: Forest Management Baseline Development**

During Phase I, SIG, in collaboration with the Pinchot Institute for Conservation, interviewed experts in biomass harvesting in the region in order to better understand the area’s forestry practices. The ultimate goal was to develop a

<sup>v</sup> For purposes of its analysis, SIG considered “sawmill residues” to only include byproducts of the sawmill process that are of such low quality that they cannot be used for other wood products.

forest management scenario that accurately depicts what would have happened in the relevant woodsheds in the absence of Drax's pellet mills.<sup>11</sup> Based on Phase I research, SIG reached the following conclusions:

- Drax's three pellets mills use mostly softwood, with the primary feedstock coming from pre-commercial thinnings from non-industrial pine plantations.
- In the absence of Drax's wood demand, non-industrial pine plantations would likely go unthinned until the final harvest.
- The supply of wood from thinning non-industrial pine plantations in the area is sufficient to meet Drax's current demand and therefore will likely not result in large-scale land use change from non-forest to forest.

Based on this information, SIG concluded that the appropriate baseline scenario to represent "no biomass"—i.e., what would have happened without Drax's pellet mills—is a situation where thinning is foregone at non-industrial pine plantations until final clearcut harvest at the end of a 25-year rotation.

An independent, on-the-ground investigation of Drax's pellet mill in Amite, Mississippi ("Drax Amite"), not associated with SIG's analysis, helps explain what it means for Drax to source from thinning of non-industrial pine plantations. As documented during that investigation, Drax's "thinnings" include large, whole trees up to 35 and 45 feet tall and 14 inches in diameter.



Pine plantation in Liberty, Mississippi. Taken in October 2018, this photo shows thinning along the bottom/left part of the harvest site and a final clearcut harvest of the middle/right part of the site. In August, whole trees from this site were tracked back to Drax Amite.

Taken in August 2018, this photo shows large-diameter, whole trees entering the Drax Amite facility. Logging trucks were tracked from two harvest sites to Drax Amite.



Photo of log stack taken in August 2018 at Amite BioEnergy pellet plant.



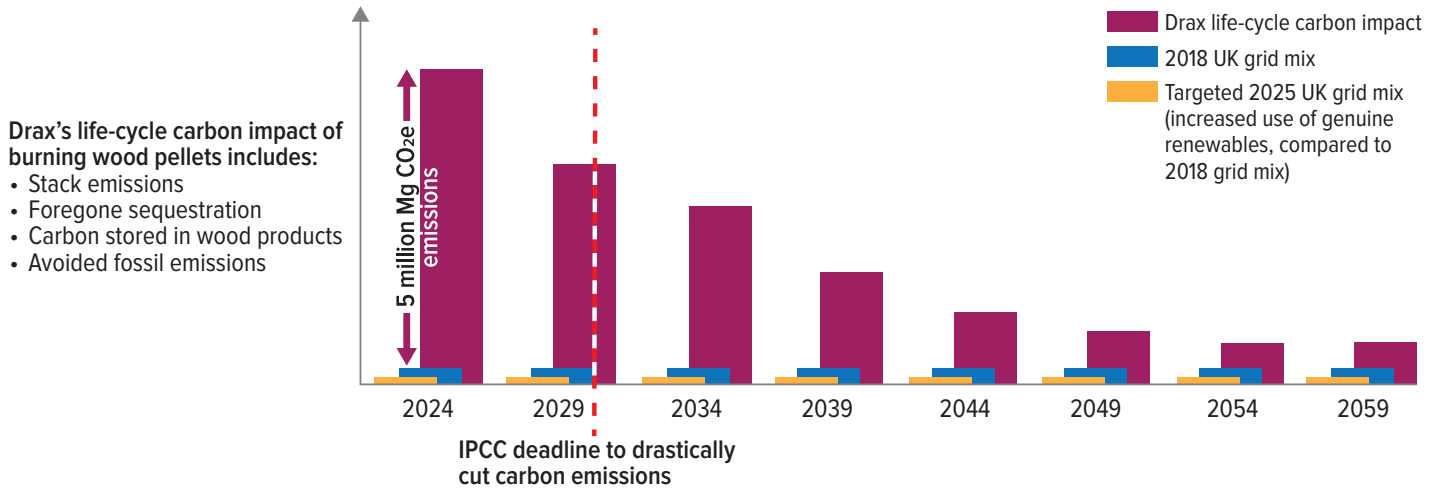
## Phase II: Carbon Life-Cycle Assessment

Phase II included a carbon life-cycle assessment (carbon LCA) for all three of Drax's U.S. pellet mills. Based on the results from Phase I, SIG's modeling focused on trees from non-industrial pine plantations as the primary feedstock, with a percentage of the feedstock also being derived from sawmill residues. Drax Amite and Drax Morehouse were both modeled at 80% non-industrial pine plantation feedstock and 20% sawmill residues, whereas Drax LaSalle was modeled at 50% of each. Information obtained during Phase I indicated that Drax LaSalle plans to obtain a large portion of its feedstock from a co-located sawmill that is currently under construction. The 50/50 split at Drax LaSalle was meant to model the impact of increasing sawmill feedstock on Drax's carbon profile.

The carbon LCA included modeling several factors: the emissions at the stack when the biomass is burned to produce electricity, which reflects the loss of carbon stocks on the land; the foregone carbon sequestration (due to increased harvest activities); the carbon stored in region-specific, long-lived wood products; emissions from pellet processing and transport; and avoided electricity generation emissions from the fossil fuels replaced by biomass.

The graph<sup>vi</sup> below shows the net difference between the life-cycle carbon impact of burning wood pellets from Drax’s mills combined (purple); the carbon profile of the UK’s 2018 electricity grid mix (blue); and a targeted, 2025 electricity grid mix (orange). The 2025 emission profile is based on the Committee for Climate Change’s projected grid mix in order to meet the UK’s carbon reduction targets; it represents a significantly decreased percentage of fossil fuels and greater utilization of genuine renewable energy sources, such as wind and solar.<sup>12</sup> Wherever the purple bar exceeds the blue and orange bars it represents an *increase* in carbon impacts relative to the baseline scenario. Were the purple bar to meet the blue or orange bar, this would represent the point of carbon parity between biomass electricity and the baseline. However, as shown below, carbon parity is not reached during the 40 years modeled by SIG. In fact, carbon parity for Drax’s mills combined is unlikely to be reached until far beyond 2059.

**The carbon impact of burning wood pellets from Drax’s three U.S. mills is worse than the emissions from the UK electricity grid mix until beyond 2059, well past the deadline needed to address climate change.**



Importantly, SIG’s carbon parity conclusions are *conservative* estimates, meaning that carbon parity times are likely longer than what is presented in the above graph. This is because SIG modeled carbon stocks and flows using a higher percentage of sawmill residues than the current feedstock mix of Drax’s mills. Additionally, SIG’s modeling does not consider the potential share of hardwoods in Drax’s current feedstock mix, which may be as high as 5 to 20%. As demonstrated by previous carbon life-cycle modeling for Enviva’s hardwood-heavy feedstock mix, the use of hardwoods tends to prolong carbon parity times.

**CONCLUSION**

The evidence is clear—burning wood pellets for large-scale electricity-only generation is bad for the climate. According to SIG’s new report, the life-cycle carbon impact of burning wood pellets manufactured at Drax’s three U.S. mills exacerbates climate change for more than four decades at a time when countries must rapidly decarbonize their energy systems—and well beyond the timeframes relevant for averting the most dangerous consequences of climate change. Against the backdrop of the IPCC’s urgent warnings, burning forest biomass cannot be part of the solution to climate change.

Rather than continuing to subsidize burning wood pellets for electricity, countries like the UK must focus on transitioning to genuine, zero-emission renewable energy sources, such as wind and solar, and protecting and expanding forests. The UK government, however, has diverted funds away from these true renewables in favor of providing hundreds of millions of pounds of subsidies each year to biomass. Given SIG’s findings, these subsidies are not aligned with current science on reducing carbon pollution regardless of how the forest-derived biomass is sourced. The UK government should immediately end subsidies for biomass used in large-scale electricity-only generation and redirect that support to genuine clean energy production like solar and wind.

<sup>vi</sup> The graph depicts information contained in, and the underlying data for, Figures 2(a) and 2(b) of SIG’s Phase II Report, available at [https://www.southernenvironment.org/uploads/publications/2019-05-27\\_Drax\\_emissions\\_-\\_SIG\\_report\\_Phase\\_II.PDF](https://www.southernenvironment.org/uploads/publications/2019-05-27_Drax_emissions_-_SIG_report_Phase_II.PDF). Instead of showing the two baseline scenarios separately, the accumulated net differences between the combined bioenergy scenario and the two baseline scenarios were averaged together so that they could be presented in one graph.



**For more information**

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