

## **Open Letter to the Government of France:**

### **To Protect Forests, Communities and the Climate, the Conversion of Cordemais Power Plant to Biomass Co-Firing Must Not Go Ahead**

***The undersigned groups - representing environmental, climate and social justice organisations in the main wood pellet exporting regions and elsewhere - are deeply concerned about proposals to permit Cordemais Power Station to be kept open beyond 2021 by burning a mix of biomass and coal. We believe that the power station must be shut down no later than the end of 2021 and that EDF should not be permitted to proceed with its proposed conversion to biomass.***

Meeting the central aim of the Paris Agreement, i.e. keeping global warming to 1.5 or even 2 degrees above pre-industrial levels, requires an end to the burning of fossil fuels, alongside increased protection and restoration of forests and other natural ecosystems. Continuing to burn coal beyond 2021 is incompatible with the Paris Agreement, as is converting any or most of a coal power station to burning biomass. Allowing the Cordemais power station to stay open with a partial or total conversion to biomass would undermine the French government's ambition to show international leadership in climate change mitigation.

***EDF's 'Ecocombust' proposal distracts from the reality: Only high-quality virgin wood pellets could be burned in Cordemais***

EDF says that it wants to burn black pellets composed of waste wood, mixed waste and domestic forest residues. However, no company has succeeded in burning black pellets on a commercial scale, despite many attempts. In Ontario, a coal power station was converted to burning the same type of black pellets that EDF is considering. Only a small amount of electricity was produced before the [plant's closure was announced last summer](#) due to severe corrosion, suggesting that black pellets do not possess appropriate qualities for burning in such coal power stations. Meanwhile, the [European Commission is funding a four-year research project](#) to find out whether coal power station conversion to black pellets could one day be made to work, which confirms that this is not currently possible.

The only type of biomass that can be used in power stations such as Cordemais (other than for low levels of co-firing), is white pellets made from clean wood, sourced from slow-growing trees, and with a low bark content. This was [established during the trials](#) preceding the world's largest coal-to-biomass conversion to date, by Drax plc in the UK.

***Coal-to-biomass conversions are so expensive that they only pay off with year-round electricity generation and substantial subsidies***

Converting a coal power station such as that in Cordemais to burning mainly or exclusively biomass requires expensive technical upgrades. Drax plc raised [£800 million](#) (917M€) to finance the conversion of three of its power station units. It could only afford to do so - and to then operate those units - with generous biomass subsidies, amounting to around £2 million (2.26M€) per day. Two lower-cost conversions in England (Tilbury B and Ironbridge) were both followed by catastrophic fires and, soon after, the closure of both plants. Neither of those converted plants would have been compatible with the Industrial Emissions Directive now in force and with the updated Best Available Techniques Conclusions for Large Combustion Plants due to be complied with by latest August 2021.

***Burning forest wood is not better for the climate than burning coal***

The [upfront carbon emissions of burning wood for electricity](#) are even greater than those of burning coal. Biomass advocates argue that new trees will “recapture the CO<sub>2</sub> emitted.” However, this claim has been exposed as dangerously misleading by a large number of scientific studies. Last year, [800 scientists wrote to the European Union](#), warning: “*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. The reasons are fundamental and occur regardless of whether forest management is ‘sustainable’.*” Since then, a [study](#) has shown that even burning genuine forest residues for electricity results in a very high carbon debt, incompatible with international climate goals. Those climate goals require the protection and expansion of forest ecosystems, not increased logging for energy.

### ***New demand for wood pellets threatens forests from the southern US to the Baltic States***

France has no significant pellet production, and the amount of wood needed to make a Cordemais conversion financially viable is so high that it could not be met from domestic supplies without major negative impacts on forests and on existing forest-dependent industries. The vast majority of pellets traded internationally comes from the southern US, Canada, and the Baltic States. In all of those regions, pellets are sourced from the clearcutting of highly biodiverse forests.

The southern US is by far the world’s largest pellet producing region. Pellet production heavily targets coastal hardwood forests at the heart of a global biodiversity hotspot. This region, the North American Coastal Plain, is home to hundreds of species of plants, amphibians and reptiles found nowhere else in the world. Yet the forests that many of them depend on for survival are being clearcut to respond to European pellet demand, and are often converted to monoculture pine plantations devoid of wildlife.

Excessive logging in the Baltic States also threatens forests and biodiversity. For example, in [Estonia](#), forests are of high recreational, economic and spiritual importance, and are home to a large number of Europe’s threatened species. But the [Nature Conservation Commission of the Estonian Academy of Sciences](#) has warned: “Today’s forest management as a whole is unsustainable in its present trend, does not guarantee biodiversity conservation, takes little account of ecosystem services and therefore needs to change.”

### **Burning wood or coal in power stations adversely impacts public health**

Both coal and biomass power stations are major sources of air pollutants, including nitrogen oxides and small particulates. Such air pollutants are [linked to higher levels of ill health and mortality](#) from respiratory problems, heart disease and strokes. Overall, burning biomass results in similar levels of air pollution as burning coal in power stations, although less of some and more of other pollutants. Worryingly, [data from Drax](#) shows that burning wood pellets in coal power stations significantly increases emissions of the particularly dangerous small particulates (PM10, including PM2.5). EDF has stated that it intends to operate the power station in ‘standby’ mode, to respond to grid demand, however frequent shutdowns and startups are associated with [spikes in emissions](#), well above what is emitted during continuous operation.

***For the French government to meet its climate goals and to contribute to meeting the goals of the Paris Climate Agreement, all coal power stations, including that in Cordemais, must be shut down no later than 2022. Supporting wind and solar power would secure genuinely low-carbon renewable energy [at a lower cost](#) than biomass electricity, which is far from low-carbon. [Investing in energy efficiency](#) would improve energy security and reduce carbon emissions, whilst creating a high number of jobs.***

## **Signatories:**

### **International:**

- Friends of the Earth International
- Global Forest Coalition

### **Regional/Bi-national:**

- Corporate Europe Observatory
- Biofuelwatch, UK and USA
- Birdlife Europe & Central Asia
- European Environment Bureau
- Fern, Europe
- Friends of the Earth Europe
- Institute for Agriculture and Trade Policy (IATP), Europe and USA
- Sandbag, Europe
- SEE Change Net, South-east Europe

### **National:**

- No Electricity from Forests, Australia
- North Coast Environment Council, Australia
- North East Forest Alliance, Australia
- Rainforest Information Centre, Australia
- Centar za životnu sredinu/ Friends of the Earth Bosnia and Herzegovina, Bosnia and Herzegovina
- Ecology Action Centre, Canada
- Healthy Forests Coalition, Canada
- Hnutí DUHA - Friends of the Earth Czech Republic
- NOAH - Friends of the Earth Denmark

- CESTA - Friends of the Earth Salvador
- Estonian Forest Aid
- New Wind Association, Finland
- Arbeitskreis Regenwald und Artenschutz (ARA), Germany
- Forum Ökologie & Papier, Germany
- Woodland League, Ireland
- SONIA for a Just New World, Italy
- Milieudéfense – Friends of the Earth Netherlands
- Development YES - Open-Pit Mines NO, Poland
- ZERO, Portugal
- Ole Siosiomaga Society Incorporated (OLSSI), Samoa
- Protect the Forest Sweden
- Pro Natura - Friends of the Earth Switzerland
- Corner House, UK
- Econexus, UK
- Center for Biological Diversity, USA
- Dogwood Alliance, USA
- Global Justice Ecology Project, USA
- Mangrove Action Project, USA
- Massachusetts Forest Watch, USA
- Natural Resources Defense Council, USA
- Partnership for Policy Integrity (PFPI), USA
- RESTORE: The North Woods, USA
- Southern Environmental Law Center (SELC), USA
- The Enviro Show, USA
- Wiregrass Activists for Clean Energy (WACE), USA