Subject
Your letter on the energetic utilisation of bush wood from Namibia

Dear Ladies and Gentlemen

Thank you for sending us comprehensive information on plans to provide in future heat and electricity in Hamburg by burning Namibian bush wood instead of hard coal. We are largely in accord with the criticism of the plans and the conclusions drawn by you from the calculations by Professor Rabenstein.

The UBA has been critically observing comparable measures and plans throughout Germany for years and we are very concerned about their increase in recent years, especially in the course of subsidisations for the heating transition and the coal phase-out. With regard to the use of bioenergy, we are of the opinion that, in the interest of climate -, environmental and resource protection, only biogenic residues and waste materials should be used that can verifiably not be put to any further material or chemical use. Such verification is often not easy to provide and is not sufficiently insisted upon for wood quotas. For wood from Germany, we compared the energetic potentials with the quantities and paths of use in our study "Availability and Options for the Use of Biogenic Waste and Residues in the Energy System" (BioRest) and came to the conclusion that, on assumption of the cascade principle, these are already overused by 140 PJ. For an expansion of the energetic use of wood, imported wood will therefore play an increasingly important role. In our opinion, this wood would have to be obtained under conditions that at least meet the sustainability requirements applied to the management of German forests. In our view, however, it does not seem possible at present to ensure this on an EU-wide or even global basis.
From the perspective of climate protection, the situation rather looks like this: under the given time pressure to achieve the climate targets a climate neutrality of wood combustion assumed on the premise of future wood growth cannot be reliably assumed for many origins of large quantities of energy wood.. Instead, climate assessments of the land use sector of several countries show that worldwide forest areas are turning from potential carbon sinks into sources, also due to inappropriate use patterns, and that deforestation is progressing overall. In this manner the foundation on which nevertheless assumptions and calculations for the supposedly CO_2-neutral use of biomass are built is receding globally, accompanied by the release of immense amounts of GHG emissions. Against this background, plans intended to protect the climate while substituting fossil fuels with wood should be treated with great caution. In order to be considered GHG-neutral, such plans would first have to substantiate that they only use biomass that can be obtained **additionally** to a plausible reference scenario and this in a reliably sustainable manner.

The above also applies in principle to the plans in Hamburg and the use of bush wood from Namibia, even if no primarily forestry criteria can be applied here. The sources available and cited by you indicate that with regard to the land use change from de facto bush land to pasture land aimed at through de-bushing an offset [or: neutralisation] of the emissions from burning the wood can not be assumed, or, can only be assumed to an incomplete extent, respectively. Rather, a for decades to come reduced amount of carbon sequestered in the landscape could be expected, as well as possibly additional emissions from livestock farming, the expansion of which on the newly gained or reclaimed pastureland is explicitly intended. Against the background of such a scenario, we cannot see any positive effects of the measures planned for Hamburg from the point of view of climate protection. On the contrary, there is a significant risk of accumulating, solely due to a long-term lowered sink capacity at the landscape-level

over the years, a hardly redeemable carbon debt balance that is detrimental to climate protection as a whole.

Whether and how the intended measures can positively influence the socio-economic development of the majority of the affected people in the region is difficult for us to judge at this point, but appears to be based on several prerequisites. Ecologically, we see clear risks arising from possibly inappropriately implemented, large-scale deforestation measures, where in particular constantly high demand pressure prevents a problem-appropriate harvesting method adapted to the local landscape-ecological requirements and/or an obligatory long-term maintenance of the areas does (also in future) not take place. These ecological aspects are also crucial for the plausibility of assumptions on the long-term carbon balance of the areas, as they ensure the presumed regrowth of grass and desired woody plants to compensate for the initial carbon release.

On the basis of the literature and data you have lucidly prepared, we, too, come to the conclusion that the project to burn bush wood from Namibia in Hamburg does not serve the thereby intended climate protection purposes. In addition, the characteristics, dimension and dynamics of various aspects of the addressed problem "bush encroachment" and the assumed ecological and social benefits of measures to thin out bush land or the subsequent use of bush wood appear uncertain. In this context, years of research and valuable scientific and technical project work by organisations in Namibia and German technical cooperation seem to have outlined and tested numerous valuable approaches, of which the export of bush wood for burning discussed here is only one. Therefore, against the background of the problematic climate balance of this latter use path, it seems advisable to us to prioritise a diversified approach of local and regional resource use that maximises local value creation and can be more flexibly adapted to different ecological and socio-economic conditions. Where for an intergenerational project such as the conservation of a diverse and, even under the conditions of climate change, intact savannah landscape in Namibia further support from German Technical Cooperation is desired, this should be provided to the Namibian partners irrespective of economic considerations.