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Hiroshi Kajiyama, Minister of Economy, Trade and Industry
New and Renewable Energy Division, Energy Conservation and Renewable Energy Department,
Agency for Natural Resources and Energy

Request for Formulation of GHG Emission Reduction Standards and Sustainability Standards in FiT Act

In light of concerns over sustainability and, in particular, the potential increase in the emission of greenhouse gases (GHG), WWF Japan and WWF European Policy Office urgently request that the objectives of the Act on Special Measures Concerning Procurement of Electricity from Renewable Energy Sources by Electricity Utilities (hereinafter, the “Feed-in Tariffs [FiT] Act”) be revised to ensure that Japan’s support for bioenergy lead to reductions in GHG emissions and avoid repeating the serious mistakes that have been made in the EU and elsewhere in recent years - and that are now in the process of being reversed. Increased harvesting of forests or crops for energy will typically increase emissions compared to fossil fuels and runs directly counter to the protection and restoration of forests and other ecosystems that is required to stop runaway climate change. With revised objectives in place, the FiT Act should then be equipped with the sustainability standards to ensure that the objectives are achieved.

Currently the FiT Act’s objectives put the focus on the stable supply of energy and the revitalization of local economies. It gives less emphasis to reductions in GHG emissions, which should have been the objective in the first place. The FiT Act, which was established to encourage the use of renewable energy sources such as solar power and wind power, launched the feed-in tariff scheme for renewable energy from July 1, 2012. The scheme is funded by the fees that citizens are charged to “promote renewable energy generation.”

WWF Japan released its “2017 Long-term Scenario for the Creation of a Decarbonized Society” in February 2017, which aims to have all of Japan’s energy come from renewable energy by 2050, and our activities have reflected this goal. However, in aiming for 100% renewable energy, in recent years we have become very concerned that there are no regulations on the reduction of GHG emissions required of biomass or on ensuring the broader ecological sustainability of feedstocks used in biomass power generation. Accordingly, in May 2019 WWF Japan released its Position Paper on the sustainability of bioenergy.

- WWF Japan’s 2017 Long-term Scenario for the Creation of a Decarbonized Society (Executive Summary)
https://www.wwf.or.jp/activities/data/170413ExusecutiveSummary_ENG_Final_rev2.pdf
- WWF Japan Position Paper “Bioenergy as a Sustainable Energy Source” (May 2019 Edition)
<https://www.wwf.or.jp/activities/data/WWFJapanBiomassPositionENrevMay192020.pdf>

Making renewable energy the main source of energy should be predicated on a reduction in GHG. The Fifth Basic Energy Plan lays out the direction for making renewable energy the main energy source by 2030. Japan’s energy policy pursues “3E+S,” which is the abbreviation for “energy security” (the stable supply of energy, including renewable energy), “economic efficiency,” “environment” and “safety.” Given the need to make substantial reductions in GHG as part of the implementation of the Paris Climate Agreement, it is important that the effectiveness of Japan’s biomass power generation in reducing GHG be a priority and expressed quantitatively. At the very least, it is essential that a standard be set for the reduction rate relative to fossil fuels. As Japan pursues the broader use of renewable energy, bioenergy feedstocks should only be chosen or supported by the government on the basis that they will result in GHG reductions compared to fossil fuels. However in the absence of appropriate sustainability standards, the imported feedstocks that are introduced under FiT (palm oil and woody biomass, among others) risk increasing GHG emissions compared to fossil fuels.

In light of the above, WWF Japan and WWF European Policy Office make the following requests of Hiroshi Kajiyama, the Minister of Economy, Trade and Industry, and the New and Renewable Energy Division, which is part of the Energy Conservation and Renewable Energy Department in the Agency for Natural Resources and Energy.

Requests of Hiroshi Kajiyama, Minister of Economy, Trade and Industry

1. Revise the objectives of the FiT Act to ensure that bioenergy subsidies financed by taxpayers deliver significant reductions in GHG emissions compared to fossil fuels, and establish adequate sustainability standards accordingly.
2. Instruct the New and Renewable Energy Division of the Energy Conservation and Renewable Energy Department in the Agency for Natural Resources and Energy to promptly consider and set GHG reduction standards, which should exclude bioenergy feedstocks such as palm oil and other dedicated crops or tree trunks and stumps that will typically increase emissions compared to fossil fuels and only incentivize fast-decaying wastes and residues with no other uses.

Requests for the New and Renewable Energy Division, Energy Conservation and Renewable Energy Department, Agency for Natural Resources and Energy

1. Consider and set sustainability standards including GHG reduction standards that are appropriate to the FiT scheme for bioenergy fuels. While only fast-decaying wastes and residues with no other uses should be incentivized, the discussions of the April 2020 revised edition of the Guidelines for Establishing Business Plans (Biomass Power Generation) revolve around the ways to use a variety of biomass sources for energy. Careful consideration should be given to the climate impact of burning all potential sources.
2. Establish methods to quantitatively calculate (existing methods would be possible) lifecycle GHG emissions compared to fossil fuels by a third party that has international credibility and require that this method be used across the board. When calculating GHG, the full lifecycle, from changes in land use, forgone sequestration and indirect land use change to changes in forest and soil carbon stocks and the emissions from fuel combustion, should all be included.

Since this is an open letter, we will release this request to the press. If you may have any questions, please contact WWF Japan.

For a Living Planet

Yours Sincerely,

Sadayosi Tobai,
CEO, WWF Japan

Ester Asin,
Director, WWF European Policy Office

List of Signatories as of July 14, 2020:

Haruki Tsuchiya, Ph. D, Research Institute for Systems Technology

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Biomass Industrial Society Network(BIN) <https://www.npobin.net/>

Borneo Conservation Trust Japan <http://www.bctj.jp/>

FoE Japan <https://www.foejapan.org/>

Global Environmental Forum <https://www.gef.or.jp/>

Greenpeace Japan <https://www.greenpeace.org/japan/>

Green Purchasing Network <https://www.gpn.jp/>

HUTAN Group <https://hutangroup.org/>

Japan Tropical Forest Action Network <http://www.jatan.org/>

Mighty Earth <http://www.mightyearth.org/>

Natural Resources Defense Council <https://www.nrdc.org/>

Partnership For Policy Integrity <https://www.pfpi.net/>

Stand.earth <https://www.stand.earth/>

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