

March 6, 2026

To:

Mr. Akazawa Ryosei, Minister of Economy, Trade and Industry
Mr. Suzuki Norikazu, Minister of Agriculture, Forestry and Fisheries

From:

Mighty Earth and the undersigned organizations

**Request for Effective Measures to Protect Natural Forests and Avoid Harm to Communities
in the Revised FIT Guidelines on Imported Wood Biomass**

We, Mighty Earth and the undersigned NGOs, are writing to directly share our concerns about the impacts of Japan's renewable energy feed-in-tariff (FIT) and feed-in-premium (FIP) subsidies for wood biomass on the health of forests and communities globally. We support the creation of guidance that clarifies and strengthens legality and sustainability requirements associated with wood biomass power generation and adds consistent enforcement for the requirements. The feed-in-tariff and feed-in-premium should become a forest-friendly renewable energy subsidy program where deforestation and forest degradation by renewable energy projects is not tolerated in or outside Japan.

As you create new guidelines, we request the Ministries to include the following provisions regarding imported wood biomass:

- 1. Wood biomass fuel sourced directly or indirectly from natural forests (including but not limited to primary and old-growth forests), should not be eligible for subsidy under the FIT and FIP.**

Biomass fuel produced from natural forests, not only primary and old-growth forests, should be excluded from renewable energy subsidies, considering their role in storing carbon, preserving biodiversity, and their environmental and economic value to local communities. Wood "waste," including designations of living trees as low-quality or just chipping whole trees prior to export, should not be included as an exception. This can function as loopholes allowing the destruction of large swaths of forest with significant ecosystem value in countries including Canada, Indonesia and the United States.

- 2. Require legality in production from forest to mill to port**

Wood pellet production overseas, most notably in the United States and Canada, has been linked to repeated gross air pollution and human rights violations with thousands of instances of fines and penalties for violating state and federal laws.¹ The FIT and FIP already excludes biomass fuel sourced from illegal logging. It should clarify that wood pellets made in pellet mills with repeated legal violations are also excluded. Furthermore, there have also been violations of air pollution and safety regulations at ports where

¹ United States: <https://www.selc.org/wp-content/uploads/2024/06/Pellet-Mill-Violations-in-the-South-updated-2026-02-24.pdf> and Canada: <https://landclimate.org/drax-mills/>

wood pellets are stored and transported, and these should also be excluded from eligibility in the case of recurring violations.

3. Require full traceability and public transparency to ensure compliance with legal and sustainability restrictions

Under the FIT, the users of other commodities such as palm oil and palm kernel shells were once required to disclose their sourcing to the mill where it was produced. Regardless of whether obtaining certification becomes mandatory, we request that METI publicly disclose the existing list of mills the plants source biomass from. In the future, wood biomass power plants receiving public subsidy should be required to provide METI with both an updated list of mills where they source wood biomass fuel from and traceability back to the forest the fuel is sourced from, and that should be made public as well.

Large-scale pellet mills in North America typically source wood from areas within a 50-100 km radius. Full traceability to the mills and its disclosure to the public enable third parties interested in sustainability and legality to scrutinize problems at the mill and in the surrounding forests. While FIT-certified operators may claim confidentiality for business purposes, in reality there is little competition due to a reliance on long-term contracts. Drax currently provides such information as a condition of its subsidy from the government of the United Kingdom.²

In order to ensure compliance with the above proposed provisions, we request the following methods to be added in the guidelines:

1. Feed-in-tariff and feed-in-premium certified operations should be required to conduct due diligence of their supply chains of wood pellets, publicly disclose full traceability to the pellet mills, and periodically report this information to the Ministry of Economy, Trade and Industry.

Such due diligence and transparency are expected for human rights in corporate supply chains, and recipients of clean energy subsidies should apply a similar process.

2. The revised guidelines should disallow forest certifications, or other biomass specific certification schemes as a sole means for demonstrating compliance. If certifications are used, they must be complemented with other methods of demonstrating FIT/FIP compliance as part of a comprehensive and transparent corporate due diligence process.

The most widely used certification schemes in the US and Canada are not sufficient for preventing the worst practices described above.

² <https://questions-statements.parliament.uk/written-questions/detail/2025-12-16/100761>

The Sustainable Biomass Program (SBP), which most pellet mills in North America have obtained, was created by and for the European power industry without participation from civil society organizations and fails to protect harm to forests and communities.³ The Programme for the Endorsement of Forest Certification (PEFC), widely used in Canada, certifies the logging of primary forests as sustainable. Finally, Forest Stewardship Council (FSC) certifications often used by the biomass industry, including FSC controlled and chain-of-custody (CoC) are only intended to demonstrate the minimum legality, the avoidance of the most destructive forestry practices, or the separation of certified or controlled sources from non-certified sources.

As such, there is no single certification system that provides sufficient assurance regarding the sustainability of fuels used for biomass power generation.

3. The FIT/FIP guidelines should ensure compliance with air pollution laws by requiring pellet mills to have continuous emissions monitoring systems for all regulated air pollutants with publicly accessible emissions data to be FIT/FIP eligible.

We would welcome an opportunity to speak with your staff about these issues online. Thank you for your consideration.

Sincerely,

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Conservation North, Canada
Dogwood Alliance, United States
Forum Ökologie & Papier, Germany
Global Environmental Forum, Japan
HUTAN Group, Japan
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Japan Tropical Forest Action Network, Japan
Solutions for Our Climate, South Korea
Southern Environmental Law Center, United States

³ <https://mightyearth.org/article/certifying-the-unsustainable-debunking-the-sustainable-biomass-program-sbp/>