



**Committee:** Economic Matters  
**Testimony on:** HB0875 - “Electricity-Renewable Energy Portfolio Standard -- Qualifying Biomass”  
**Organization:** MLC Climate Justice Wing  
**Person**  
**Submitting:** Diana Younts, co-chair  
**Position:** Favorable, with Amendment  
**Hearing Date:** February 18, 2021

Dear Mr. Chairman and Committee Members,

Thank you for allowing our testimony today in support of HB0875, with an amendment. We strongly urge you to support the proposed bill to remove black liquor from qualifying biomass in the Renewable Portfolio Standards (RPS) and to add an amendment to also remove incineration.

**Neither Black Liquor or Incineration is Clean:** Black liquor is a tarry, carbon-rich and harmful byproduct of the pulp and paper industry. It emits climate-disrupting CO<sub>2</sub> and other pollutants, including sulfur dioxide, arsenic and lead which cause serious damage to our climate and our residents’ health.

Trash incineration is even dirtier than black liquor and coal. To produce the same amount of energy as a coal plant, trash incinerators emit more greenhouse gases than coal plants do. Trash incinerators are the dirtiest way to make electricity by most air pollution measures. Even with air pollution control equipment in place, trash incinerators emit more pollution than (largely uncontrolled) coal power plants per unit of energy produced.

For example, to produce the same amount of energy as coal power plants in Maryland, the Montgomery County incinerator -- operated by Covanta -- releases 15% more fine particulate matter, 60% more arsenic, 68% more greenhouse gasses, and 94% more nitrogen oxide (which triggers asthma), 3.5 times the amount of chromium, 11 times more lead, 21 times more cadmium, 26 times more mercury, and 50 times more hydrochloric acid than a coal plant. Incinerators release 3.1 times the amount of mercury as landfills.

**Dirty Energy Sources such as Black Liquor and Incineration are Displacing Clean Energy at an Increasing Rate in the RPS:** The RPS is among our state's most important programs for substantially reducing our emissions of climate-disrupting greenhouse gases. The RPS' increased importance under the 2019 Clean Energy Jobs Act (CEJA) means it should be focused on incentivizing new, renewable energy facilities which will support Maryland's efforts to mitigate climate change. Instead, a shockingly large and growing percentage of Maryland's renewable "clean energy" in the RPS comes from high-polluting energy sources. Maryland's percentage of energy from dirty sources (incineration, black liquor, biomass) in the tier 1 Renewable Portfolio Standards *grew from 33% in 2018 to 40% in 2019*. In 2019 alone, Maryland paid over \$32 million to buy renewable energy credits from dirty energy sources. See Report [here](#).

Removing black liquor and incineration from the RPS would lead to greater support for clean renewable energy. When dirty forms of energy are incentivized, they are treated like solar and wind energy and displace clean sources in the RECs market.

Black liquor accounts for 25% of the energy in the RPS. Because Maryland's only paper mill closed in 2019, all of that energy is from out of state. Excluding black liquor and incineration would reduce the pool of RECs in the PJM grid, which could be filled by truly clean, renewable energy. While black liquor uses more RECs (renewable energy credits) than does incineration, each REC bought for incineration represents more pollution than each REC given to black liquor. One incineration REC represents 800% more CO<sub>2</sub> than one Black Liquor REC and also emits more toxic pollutants than does black liquor.

As Speaker Adrienne Jones said recently, "climate change is an existential threat" and removing black liquor from the RPS is an "important first step" in addressing it. Removing incineration is just as important.

For these reasons, we urge you to support HB0875, with an amendment, and remove black liquor as qualifying biomass and incineration in the Renewable Portfolio Standards.

Submitted by:

**MLC Climate Justice Wing:**  
Maryland Legislative Coalition  
MD Campaign for Environmental Human Rights

Chesapeake Climate Action Network  
WISE  
Frack Free Frostburg

Mountain Maryland Movement  
Clean Water Action  
Maryland Sierra Club  
Howard County Indivisible  
Howard County Sierra Club  
Columbia Association Climate change and  
sustainability advisory committee  
HoCo Climate Action  
CHEER  
Climate XChange - Maryland  
Mid-Atlantic Field Representative/  
National Parks Conservation Association  
350 Montgomery County  
Glen Echo Heights Mobilization  
The Climate Mobilization Montgomery County  
Montgomery County Faith Alliance for  
Climate Solutions  
Montgomery Countryside Alliance  
Takoma Park Mobilization Environment  
Committee  
Audubon Naturalist Society

Cedar Lane Unitarian Universalist Church  
Environmental Justice Ministry  
Coalition For Smarter Growth  
DoTheMostGood Montgomery County  
MCPS Clean Energy Campaign  
MoCo DCC  
Potomac Conservancy  
Casa de Maryland  
Nuclear Information & Resource Service  
Clean Air Prince Georges  
Laurel Resist  
Greenbelt Climate Action Network  
Maryland League of Conservation Voters  
Unitarian Universalist Legislative  
Ministry of Maryland  
Concerned Citizens Against Industrial Cafos  
Wicomico NAACP  
Chesapeake Physicians for Social Responsibility  
Chispa MD  
Climate Law & Policy Project  
Poor Peoples Campaign  
Labor for Sustainability  
The Nature Conservancy  
Clean Air Prince Georges  
350 Baltimore  
Maryland Environmental Health Network