

# Open Letter

**to the Federal Minister for Economic Cooperation and Development,  
Dr Gerd Müller,  
regarding the GIZ project „Bush Control and Biomass Utilisation“  
(BCBU)**

Copied to:

- Federal Minister for Environment, Nature and Nuclear Safety, Ms Svenja Schulze
- Federal Minister for Economic Affairs and Energy, Mr Peter Altmaier

**18<sup>th</sup> February 2021**

**Adverse climate impacts, job destruction, alternative facts and a neo-colonial paradigm supported with German development funds? This is not acceptable!**

Dear Dr Müller,

The signatories to this letter - environmental and development organisations, climate justice activists and scientists - are deeply concerned about the project "Bush Control and Biomass Utilisation" (BCBU) which the German Development Agency (GIZ) is carrying out in Namibia on behalf of your Ministry.<sup>1</sup>

The majority of recent scientific studies show that the increase of woody plant cover in semi-arid savannah landscapes is associated with carbon sequestration.<sup>2</sup>

The BCBU-project, which is being funded with around ten million Euros during its current phase, promotes the industrial-scale removal of woody plants, Namibia's largest carbon sink<sup>3</sup>, across an area of around 30 million hectares, an area the size of Italy. Furthermore, there are strong indications that the project could be ecologically damaging. For example, a Strategic Environmental Impact Assessment commissioned by GIZ and the Namibian Government warns of significant environmental risks.<sup>4</sup> Finally, negative impacts on employment as well as an exacerbation of social inequality can be expected<sup>5</sup>. The project could thus become a classic case of a development causing social and ecological harm.

The apparent aims of the BCBU project are the intensification of cattle ranching and the development of a '*big biomass business*'.<sup>6</sup> Since 2019-20, a bushwood export strategy has been promoted with those two goals. Bushwood is to be burned as fuel in converted coal plants, such as in the Tiefstack plant located in Hamburg. Due to a legal carbon accounting 'trick', energy from burning bushwood would be lawfully classified as CO<sub>2</sub>-neutral. The large-scale export of bushwood to Europe would be designed in such a way that German power and heat plant operators, manufacturers of agricultural and forestry machinery, and venture capitalists would profit from the scheme, whereas all of the risks arising from the

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1 [GIZ projekt Bush Control and Bush Biomass Utilisation \(BCBU\)](#); project number : 2017.2064.8; total duration: 14.10.2013 - 31.12.2021; current project: 01.01.2018 - 31.12.2021; GIZ project leader : Johannes Lauf (johannes.laufs@giz.de)

2 Summary of relevant scientific literature: <https://www.biofuelwatch.org.uk/2021/critique-uniquegmbh-namibia-study/>

3 <https://unfccc.int/sites/default/files/resource/na-Inventory%20report%201991-2015.pdf>

4 SAIEA 2015: *Strategic Environmental Assessment of Large-Scale Bush Thinning and Value-Addition Activities in Namibia*, S.42, Commissioned by GIZ de-bushing project

5 HET 2020: [Buschholz-Export aus Namibia – Auswirkungen auf den namibischen Arbeitsmarkt](#).

6 Wilkie & David 2020: [Namibia's bush business](#). *RURAL* 21.

project would be carried by Namibian actors. German companies could open up new markets,<sup>7</sup> whereas within Namibia, the economic benefits from the production of woodchips and/or pellets from bushwood would be minimal. Development cooperation with Namibia based on the production of desired raw materials and potential profit margins for 'green' capital fits into the negative historical tradition of neo-colonialism.<sup>8</sup> Principles of development cooperation such as ownership or accountability are not being followed.

After it became apparent that the GIZ representatives responsible in Namibia were not properly engaging with criticism, more than 20 organisations and individuals signed a joint statement warning about the extremely problematic developments linked to this project.<sup>9</sup> Subsequently, in November 2020, Hamburger Energietisch (HET) sent a letter to Mrs Tanja Gönner, Chair of the Board of GIZ, asking for a response and for changes to the project. The brief response issued by GIZ did not address the problems identified and displayed an unacceptable and institutional lack of awareness of what the problems were, as well as a lack of seriousness when addressing fact-based critique. With regards to the substantiated criticism of a crucial study about climate impacts by UNIQUE, commissioned by GIZ, the response to the letter said "*GIZ cannot find any flaws*", even though the author of the UNIQUE study had admitted flaws in the study.<sup>10</sup>

The recent publication of another feasibility study by the Institute for Applied Material Flow Management, based at the IfaS institute at the University of Trier,<sup>11</sup> adds to the problems with the direction of this development project. That report lists very few scientific references and contains false information (e.g., claiming that legislation is in place to end lignite burning as early as 2022). Moreover, it contains a completely unacceptable statement in relation to Germany's postcolonial responsibilities, claiming that Biomass Industry Parks offer a chance to "heal the damages related to historical events" (p.28).

Glorifying a project driven by economic interests as a form of compensation whitewashes the genocide and conveys an ahistorical understanding of the principles of justice.

The signatories of this letter vehemently reject the GIZ project "Bush Control and Biomass Utilisation" (BCBU) in its current form because...

- it does not meet scientific standards;
- its realisation would have an adverse impact on the climate;
- it involves claims which whitewash Germany's historic responsibilities;
- it would deepen the continued unequal (neo)colonial relationship between Germany and Namibia;
- it carries a high risk of economic, social and ecological harm within Namibia.

**The export of bushwood would contribute nothing to climate change mitigation, nor would it contribute to reparations for Germany's colonial crimes. Instead, it would deepen climate injustice.**

**GIZ is acting in your name in Namibia. We therefore call on you to:**

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7 see for example the aims of the [German Climate and Technology Initiative \(DKTI\)](#), which supports the BCBU project with around 6.5 million €

8 Economic & Social Justice Trust 27.01.2021: [Utilisation of Namibia's Bush Biomass: A chance for a developmental intervention to break colonial trade pattern](#), press release, Windhoek, Namibia.

9 [Joint statement against the import of Namibian bushwood for use in power and heat plants in Hamburg](#), 9<sup>th</sup> October 2020

10 a) [Letter to Mrs Gönner, GIZ](#), 19<sup>th</sup> November 2020, b) [Annex of the letter dated 19<sup>th</sup> November 2020](#), c) [Response by Mrs Gönner, GIZ](#), 17<sup>th</sup> December 2020

11 Peter Heck,2020.: [Road Map to a Biomass Industrial Park. Biomass Partnership with Namibia](#). IfaS commissioned by GIZ

- arrange for an in-depth investigation of the GIZ BCBU project in relation to the aims agreed with BMZ, which are climate change mitigation, improved living conditions and employment opportunities for rural communities as well as better protection for natural resources and biodiversity. In this context, it will be particularly important to establish to what extent there were contraventions of standards for good practice, such as scientific scrutiny, a strategy for minimising project risks, and the no-harm principle that applies to German development cooperation;
- to address the fact that the project's structure replicates the (neo)colonial relationship between Germany and Namibia and to explore how the problematic understanding of history expressed as part of the BCBU project could have come about;
- to recognise that, as confirmed by credible scientific studies, the use of biomass imported from the global South for energy generation risks exacerbating the global climate and biodiversity crises, and thus cannot contribute to a sustainable energy transition in Europe.<sup>12</sup> German development finance must not contribute to measures which worsen the climate and biodiversity crises;
- to immediately withdraw the highly misleading studies commissioned from UNIQUE (Seebauer et.al., 2020) and IfaS (Professor Peter Heck, 2020).

Further details of our critique can be found below. We would be very happy to discuss our critique of the project with you.

**We hope that you will respond to our critique and to the demands contained in this letter by 4<sup>th</sup> March 2021 so that we can take your perspective into account when planning further work on this issue.**

Regards,

Jana Ballenthien, ROBIN WOOD, on behalf of all signatories

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12 European Commission, Joint Research Centre (JRC) 2021: [The use of woody biomass for energy production in the EU](#).

## **German Organisations**

ARA

Wolfgang Kuhlmann, C.E.O.

Bergwald e.V.

Stephen Wehner, C.E.O. and Board of Directors

Botanischer Verein zu Hamburg e.V.

Horst Bertram, Honorary Chairman

BundesBürgerInitiative WaldSchutz (BBIWS)

Susanne Ecker, Founding member

Centre for Ecomics and Ecosystem Management an der Hochschule für Nachhaltige  
Entwicklung Eberswalde (HNEE)

Pierre Ibisch, Professor for Nature Conservation

denkhausbremen e.V.

Peter Gerhardt, C.E.O.

Deutsche Umwelthilfe e.V.

Sascha Müller-Kraenner, C.E.O.

Deutsche Umweltstiftung

Jörg Sommer, Chairman of the Board of Directors

ecodevelop - Aktion für ökologische Entwicklung

Hans Christian Offer

Ende Gelände Hamburg

Fab Lab Fabulous St. Pauli e.V. Hamburg

Axel Sylvester, Board of Directors

Forum Umwelt und Entwicklung

Jürgen Maier, C.E.O.

Forum Ökologie & Papier

Evelyn Schönheit & Jupp Trauth

Hamburger Energietisch e. V.

Bernd Liefke, Chairperson

NaturFreunde HH e.V.

Helene Hohmeier, Chairperson

Naturwald Akademie

Pamela Scholz, C.E.O.

Netzwerk Recht auf Stadt Hamburg

Rettet den Regenwald e.V.

Marianne Klute, Chairperson

ROBIN WOOD e.V.

Jana Ballenthien, Forest Campaigner

Wohllebens Waldakademie  
Tobias Wohlleben (C.E.O.) & Peter Wohlleben

### **International Organisations**

Biofuelwatch, UK  
Almuth Ernsting, Co-Director

Earthlife Namibia  
Bertchen Kohrs, Chairperson

Environmental Paper Network, International  
Luisa Colasimone

Fern, Europe  
Hannah Mowat, Campaigns Coordinator

Foundation tree union, Netherlands  
Paul Dufour, Chairman

Friends of the Siberian Forests, Russia  
Andrey Laletin, Chairman

GeaSphere, South Africa  
Philip Owen, Director

Global Forest Coalition, International  
Coraina de la Plaza, Climate Campaign Coordinator & Social Media Officer

Leefmilieu, Netherlands  
Maarten Visschers, Board member

Natural Resources Defense Council (NRDC), New York, USA  
Debbie Hammel, Deputy Director, Lands Nature Program

NOAH Friends of the Earth, Denmark  
Mads Kjærgaard Lange, Organisational Development Secretary

Pivot Point, Washington, USA  
Peter Riggs, Executive director

Pro Wildlife, International  
Sandra Altherr, Co-founder

Protect the Forest, Sweden  
Elin Götmark, Spokesperson

Save Estonian Forests, Estonia  
Liina Steinberg, Coordinator

The Woodland League, Ireland  
Andrew St Ledger, Public Relations Officer

Water Justice and Gender, International  
Dr. Juana Vera Delgado, Director

Wild Europe, Europe  
Toby Aykroyd, Coordinator

ZERO - Associação Sistema Terrestre Sustentável, Portugal  
Francisco Ferreira, President of the Board



**Contact for further questions:**

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## **ANNEX**

### **1) Bush encroachment – a potential economic problem for cattle farmers in central Namibia but not an all-out ecological disaster**

Publications commissioned and funded through the GIZ-BCBU project claim that bush encroachment results in massive ecological harm. In the context of this project, the discourse about an “original savannah” and its biodiversity being degraded by ‘excessive growth’<sup>13</sup> of ‘shrubs’<sup>14</sup> or ‘impenetrable thickets’<sup>15</sup> appears to function as a way of legitimising large-scale debushing.

This discourse, which resorts to emotive terminology, is not backed by scientific findings. In many respects it is simplistic or even misleading:

- Poor grazing management and overgrazing are important drivers of bush encroachment, however, BCBU fails to address underlying mechanisms of the problem;
- Scientific studies that focus on ecosystem functions show that savannah encroachment by shrubs and trees in semi-arid regions can also have positive effects on soil fertility, soil nutrient cycling, soil biota, productivity, biodiversity and carbon sequestration;<sup>16,17</sup>
- The BCBU project largely ignores the fact that bush removal activities are often not successful in terms of ensuring environmental sustainability, and that they can have unwelcome consequences such as more rapid subsequent bush growth as well as ecological harms, particularly when carried out with heavy machinery and undertaken repeatedly on the same area of land.<sup>18</sup>

Bush encroachment can pose economic problems for cattle farmers, but it does not constitute an all-out ecological catastrophe. On the other hand, it is certain that a major intensification of cattle ranching on the land targeted for bush removal would significantly increase ghg emissions from enteric fermentation and pose serious additional risks for biodiversity, soils, and hydrology. The project foresees a tripling of the number of cattle.<sup>19</sup>

It is unscientific and misleading to describe bush encroachment as a universal ecological problem and to present industrial debushing with heavy machinery, aimed at intensifying cattle production, as a measure to protect biodiversity. In this context, it is revealing that reports published as part of this project are not recommending debushing activities in protected areas, in high conservation value areas, or next to freshwater bodies.

### **2) Coal phaseout through conversion to woody biomass:**

A new feasibility study by the Institute for applied Material Flow Management (IfaS) commissioned by GIZ<sup>20</sup> promotes the large-scale export of wood from Namibia and neighbouring countries to Germany in order to replace the use of hard coal for energy with biomass from southern Africa. The study also refers to Namibia entering the global wood pellet market and suggests high potential profit margins for (German) investors.

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13 Ministry for Environment, Climate, Energy and Agriculture (BUKEA), Hamburg Senate, [Projekt Biomasse-Partnerschaft Hamburg-Namibia](#)

14 **Bürgerschaft der Freien und Hansestadt Hamburg [Hamburg Parliament] 2020: Schriftliche Kleine Anfrage des Abgeordneten Stephan Jersch (DIE LINKE) vom 15.09.20 und Antwort des Senats Written Question by member of the Hamburg Parliament Stephan Hersch, Die Linke, 15<sup>th</sup> September 2020 and Response by the Senate]: [MoU zur Biomassepartnerschaft mit Namibia](#). Drucksache 22/1421.**

15 <https://www.hamburg.de/energiewende/namibia-biomass-partnership/14503672/verbuschung/>

16 Blaser et al. 2014: [Woody encroachment reduces nutrient limitation and promotes soil carbon sequestration](#). Ecology and Evolution.

17 Eldridge & Soliveres 2014: [Are shrubs really a sign of declining ecosystem function? Disentangling the myths and truths of woody encroachment in Australia](#). Australian Journal of Botany.

18 see footnote 4

19 see footnote 10

20 see footnote 12

A European transition from coal to wood-burning, which is promoted by this project, has been rejected by an overwhelming number of scientists who warn of potentially disastrous impacts on climate and biodiversity.<sup>21</sup> Wood combustion is highly ghg intensive per unit of energy and harmful to the climate, due to a carbon payback period of decades or even centuries.<sup>22</sup> The ecological disruption caused by logging often degrades or even destroys forests.<sup>23</sup>

The fact that it can make economic sense to transport woody biomass across large distances to Germany is linked to a widely criticised flaw in the EU's Emissions Trading Scheme (EU-ETS) rules. Biomass is classified as having zero emissions. Power and heat plant operators burning wood can therefore avoid having to buy increasingly expensive CO<sub>2</sub> credits. In actual fact the combination of forest degradation and actual emissions from burning wood are a double whammy for the climate.

### 3) Deception of the public, including about the adverse climate impacts of debushing :

Logging forests and burning wood for energy increases CO<sub>2</sub> concentrations in the atmosphere over a period of decades, even if new trees grow back on the same land.<sup>24,25</sup> The European Commission is currently warning against the burning of wood in large power stations in a policy briefing.<sup>26</sup> In Namibia, however, any regrowth is to be prevented, in order to promote the growth of grass and to double or triple cattle numbers. Results from numerous scientific studies published over the last ten years show that bush encroachment tends to increase soil organic carbon content and sequestration in semi-arid regions,<sup>27 28 29 30 31 32 33</sup> and that intensive grazing undermines this and other ecosystem functions.<sup>34 35 36</sup>

As part of this project, GIZ commissioned the consultancy *UNIQUE forestry and land use GmbH* to produce a study about the climate impacts of proposed debushing scenarios.<sup>37</sup> The authors of this study reached a different conclusion to the studies cited above: they present debushing as a climate mitigation measure. In doing so, they rely heavily on a small number of sources some of which are

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21 EASAC 2018: [Commentary by the European Academies' Science Advisory Council \(EASAC\) on Forest Bioenergy and Carbon Neutrality](#).

22 Booth 2018: [Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy](#). Environ. Res. Lett. 13

23 Zivilgesellschaftliches Aktionsforum Bioökonomie 2020: [Kein Raubbau im Wald für eine falsche Energiewende](#), Stellungnahme vom 24.11.2020.

24 Norton et al. 2019 : [Serious mismatches continue between science and policy in forest bioenergy](#). GCB Bioenergy.

25 Ibsch et al. 2021: *Wie das Klimaschutznarrativ die Wälder bedroht* (S.175-200), in "Der Holzweg. Wald im Widerstreit der Interessen". oekom

26 Ballenthien 2021: EU scientists are warning against burning forest biomass, blog article, 27<sup>th</sup> January 2021, ROBIN WOOD.

27 Rabenstein 2020: [Verwertung von Buschholz aus Namibia in Hamburg: Auswirkungen auf das globale Klima](#). Hamburger Energietisch e.V. (HET).

28 Zhou et al. 2019: [A Three-Dimensional Assessment of Soil in a Subtropical Savanna: Implications for Vegetation Change and Soil Carbon Dynamics](#). Soil Systems.

29 Dlamini et al. 2019.: [Chemical stabilisation of carbon stocks by polyvalent cations in plinthic soil of a shrub-encroached savanna grassland, South Africa](#). CATENA.

30 Barger et al. 2011: [Woody plant proliferation in North American drylands: A synthesis of impacts on ecosystem carbon balance](#). Journal of Geophysical Research.

31 Mureva et al. 2018: [Soil Organic Carbon Increases in Semi-Arid Regions while it Decreases in Humid Regions Due to Woody-Plant Encroachment of Grasslands in South Africa](#). Scientific Reports.

32 Sandhage-Hofmann et al. 2020: [Woody encroachment and related soil properties in different tenure-based management systems of semiarid rangelands](#). Geoderma.

33 Li et al. 2016: [Effects of shrub encroachment on soil organic carbon in global grasslands](#). Scientific Reports.

34 Elridge et al. 2015: [Do shrubs reduce the adverse effects of grazing on soil properties?](#) Ecohydrology.

35 Throop et al. 2020: [Soil organic carbon in drylands: shrub encroachment and vegetation management effects dwarf those of livestock grazing](#). Ecological Applications.

36 Wigley et al. 2020: [Grasses continue to trump trees at soil carbon sequestration following herbivore exclusion in a semiarid African savanna](#). Ecology.

37 s. FN 10

outdated, and they misquote many of the findings from scientific studies.<sup>38</sup> Furthermore, their study contains fundamental methodological errors, draws unsubstantiated conclusions about carbon storage in and sequestration by Namibian grasslands, and omits the loss of ongoing carbon sequestration by bushes and trees from the scenarios and calculations presented. UNIQUE has thus created 'alternative facts', which, amongst others, contradict findings of another recent GIZ-funded study with a similar scope in Ethiopia.<sup>39</sup>

The flawed UNIQUE study has had detrimental effects. For example, a policy briefing published as part of the GIZ-BCBU project cites UNIQUE's false conclusions in a planning application for a 40MW bushwood power station.<sup>40</sup> The Senate in Hamburg refers to the study in its CO<sub>2</sub> life-cycle assessment.<sup>41</sup> There are concerns that the serious carbon calculation errors in the UNIQUE study may find their way into an Analysis and Revision of AFOLU Targets in Namibia's NDC which GIZ has commissioned UNIQUE to undertake with BMZ finance.<sup>42</sup> Another worrying possibility is that UNIQUE's false conclusions could contribute to bad investments as part of the Green Climate Fund's (GCF) project for a climate-friendly energy transition in Namibia.<sup>43</sup> Given that bush encroachment is found in other countries and regions, the same errors could in future be replicated in other countries.

GIZ has been repeatedly informed about the grave errors contained in the UNIQUE study.<sup>44</sup> Instead of attempting to correct and consolidate the findings, such criticism has been covered up and not publicly acknowledged.

#### **4) Self-interest: Advantages for Germany – disadvantages for Namibia?**

The feasibility study for the export of subtropical wood is addressed at investors and potential customers for Namibian wood. It promises economic advantages for the global North. Promises for Namibia, on the other hand, are speculative and in many cases do not stand up to scrutiny.

In the medium term, the feasibility study by IfaS foresees the creation of 105 "Biomass Industry Parks" in Namibia with an annual throughput of 250,000 tonnes of wood from bushes and trees. Around 25 million tonnes of bushwood a year are to be processed to livestock fodder and to woodchips and/or pellets, mostly for export to the global North.

The GIZ project BCBU has been systematically working towards the export of large quantities of bushwood to the global North since at least 2019. Export-oriented large-scale wood removal would have a labour productivity 20 times higher than that of the smaller-scale manual debushing undertaken at present in Namibia.<sup>45</sup> The mechanisation foreseen would therefore destroy many existing jobs. According to plans by the *Namibian Biomass Industry Group* created and financially supported by the GIZ-BCBU project, the debushing would involve heavy machinery, whereas at present, manual and semi-mechanised bush removal methods are used in Namibia, which have a lower impact and are more labour intensive. High labour intensity reduces profit markets, and those bush removal methods would be confined to areas that are more difficult to access or ones with lower yields.<sup>46</sup>

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38 Biofuelwatch 2021: [Critique of UNIQUE GmbH's report "Greenhouse Gas Assessment of Bush Control and Biomass Utilization in Namibia"](#).

39 Birhane et al. 2017: [Can rangelands gain from bush encroachment? Carbon stocks of communal grazing lands invaded by \*Prosopis juliflora\*](#). Journal of Arid Environments.

40 Petrick 2020: *Environmental Impact Assessment (EIA) for the proposed Encroacher Bush Biomass Power Project in Namibia*. SLR consulting Ltd im Auftrag von NamPower.

41 Behörde für Umwelt, Klima, Energie und Agrarwirtschaft: [Berechnung - CO<sub>2</sub>-Bilanz des Projekts Biomasse-Partnerschaft](#).

42 vgl. [Projektdatenbank der UNIQUE GmbH](#). 2021.

43 Van Rooij et al. (im Auftrag von GIZ/BMZ) 2013 - [Understanding Climate Finance Readiness Needs in Namibia](#)

44 see footnote 11

45 De Wet 2015: [Harvesting of Encroacher Bush: Compendium of harvesting technologies for encroacher bush in Namibia](#). commissioned by von MAWF & GIZ-BCBU.

46 Honsbein & Njembo 2020 (S.7): *Labour-Based Encroacher Bush Harvesting Guidelines*. GIZ-BCBU, Windhoek

The Covid-19 pandemic has increased Namibia's unemployment rate to over 50%; a further net loss of jobs would be a major blow to the country.<sup>47</sup> Yet GIZ has not commissioned any substantial study of social and labour market impacts in Namibia.<sup>48</sup>

It is simply untrue that bush encroachment in Namibia can only be stopped with the help of wood exports.<sup>49</sup> Without the wood exports promoted by GIZ, far more jobs could be created by processing wood within Namibia.<sup>50</sup>

Power and heat plant operators in Europe would – according to a legal carbon accounting trick under the EU's Emissions Trading Scheme (EU-ETS) rules – not have to account for ghg emissions from burning biomass and would not have to purchase costly CO<sub>2</sub> certificates for them.

At the same time, according to existing UNFCCC-NDC rules, greenhouse gas inventories must include emissions and removals of carbon from land use change in the AFOLU sector. Emissions which result from Europe's demand for woody biomass, would appear in Namibia's land use sector, thus worsening the countries ghg balance. Instead of being able to use its carbon sinks in existing CO<sub>2</sub> markets or markets to be created under Article 6 of the Paris Agreement, Namibia would have to shoulder part of Germany's responsibility for ghg emissions.

GIZ's plans in Namibia are reminiscent of Vattenfall's scandalous project that involved burning wood from old rubber trees from Liberia in a heat plant in Berlin. Liberia suffered the consequences, from economic and environmental harm to serious human rights abuses.<sup>51</sup>

### **5) Domestic processing of bushwood inside Namibia**

The formal objective of the GIZ BCBU project is to ensure that "the economic utilisation of biomass from controlled bush thinning of pasture land has improved."<sup>52</sup> In order to achieve this goal, there is no need for large-scale export of unprocessed bushwood to Europe which would provide only a small number of jobs.

### **6) The project follows a (neo)colonial tradition**

The colonial and extractivist aspects of the projects have been entirely ignored. The project's proponents are proposing to extract resources from Namibia and export them to Germany. Such a commodity export of wood would go along with the depletion of natural resources (trees and bushes, nutrients contained in wood and soil underneath trees and bushes, ecosystem services, CO<sub>2</sub> storage and sequestration, etc.). The project continues a (neo)colonial pattern because of its focus on export, in so far as Namibia is regarded simply as a provider of raw materials to Germany.

According to statements by Wärme Hamburg<sup>53</sup>, the publicly owned heat provider for the city, the expectation is that bushwood will be obtained at competitive international market prices. This rules out any sustainable after-care to restore grasslands and exposes the project's exploitative character.

Presenting the BCBU project as a 'partnership'<sup>54</sup> is misleading and implies genuinely representative participation by Namibian civil society in the the project's development. A look at the list of project partners reveals a dominance of privileged actors with economic interests and sows that the majority

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47 [see footnote 5](#)

48 [Bürgerschaft der Freien und Hansestadt Hamburg 2020 \[Hamburg Pparliament': Projekt „Biomasse-Partnerschaft Hamburg-Namibia“. Schriftliche Kleine Anfrage der Abgeordneten Sandro Kappe, Stephan Gamm und Eckard Graage \(CDU\) vom 20.10.20 und Antwort des Senats \[Written question by member of the Hamburg parliaments Sandro Kappe, Stepohan Gamm and Eckard Graage, CDU, 20<sup>th</sup> October 2929 and response from the Senate\]. Drucksache 22/1831.](#)

49 HET 2020: [IfaS Trier-Rechenschwäche Nr. 2.](#)

50 Jauch 2020: [Farm Workers, Labour Rights, Trade Unions and Bush Biomass in Namibia.](#) HET

51 Steinweg et al. 2013: [Cut and Run: An update on the impacts of Buchanan Renewables' operations and Vattenfall's divestment.](#) SOMO, Green Advocates & Swedwatch.

52 [https://www.giz.de/projektdaten/projects.action?pn=201720648&request\\_locale=en\\_GB](https://www.giz.de/projektdaten/projects.action?pn=201720648&request_locale=en_GB)

53 During the event "The Biomass Namibia Project – Options of energetic use of Namibian bushwood in Namibia and Hamburg – CO<sub>2</sub> life-cycle emissions", 17<sup>th</sup> December

54 [see footnote 10](#)

of actors within the *Biomass Partnership* are German.<sup>55</sup> Some of those project partners had been invited by GIZ to a safari-style lobby tour, led by IfaS's Professor Heck, including a stay in a lodge in Namibia.<sup>56</sup> Small enterprises and black or indigenous organisations appear not to have been included. Such biased selection of project actors follows a (neo)colonial logic and contradicts the principle agreed by BMZ that poverty reduction amongst the rural population must be at the heart of this project.<sup>57</sup>

The use of the term 'partnership' obscures those asymmetric power structures. Furthermore, it hides dependencies, as we can see in the feasibility study by IfaS, which states<sup>58</sup> "Germany is a resource poor country" (p.28) and argues that Germany cannot meet the feedstock requirements for converting coal plants to wood from its own forest but would depend on the import of resources. Claims about a supposed win-win scenario obscures the fact that Germany would not shoulder the risks from a failure of the project in the same way as Namibia. This signifies a continuation of a (neo)colonial dependent relationship.

The biomass lobby group "N-Big" was founded in 2015 with direct support by GIZ-BCBU. It primarily represents the interests of privileged large landowners, who own 70% of Namibia's agricultural land between them<sup>59</sup> and who are mostly descendants of German and South African colonial rulers. The BCBU project is located in the very region where the genocide of 75,000 Ovaherero and Nama people occurred.

The private equity enterprise "Carbon Capital Namibia" was founded in 2020 in close contact with the BCBU project and has been included by GIZ in the process for assessing the impacts and feasibility of burning Namibian bushwood in heat plants in Hamburg.

Professor Heck's statement on page 28 of the feasibility study<sup>60</sup> referring to the project as an opportunity to "*heal the damages related to historic events*" does not do justice to Germany's historic responsibility. The German companies and industry associations addressed by GIZ and the BCBU project, some of whose directors were taken on a safari-style lobby tour in Namibia,<sup>61 62</sup> would directly benefit from this project. The same is the case for Namibian actors such as the lobby group N-Big or Carbon Capital. None of those potential benefactors have any connection with the associations representing the survivors of the colonial genocide. It is impossible to imagine how large-scale export of biomass, Biomass Industry Parks, or the depletion of Namibia's carbon sinks can possibly be regarded as a way of 'healing' the genocide of some 75,000 Ovaherero and Nama people. Instead, such a careless statement conveys a historical amnesia of Germany's colonial crimes.

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55 Behörde für Umwelt, Klima, Energie und Agrarwirtschaft: [Projekt Über die Biomasse-Partnerschaft Hamburg Namibia](#).

56 Dr. Rainer Schrögle (Creaper) 2019. [Gras für Namibia](#). Reisebericht.

57 see footnote 1

58 see footnote 10 (p. 28)

59 Namibia Statistics Agency (NSA) 2018 - [Namibia Land Statistics Booklet](#).

60 [see footnote 12](#)

61 PresseBox 2019: [Biomasse als Entwicklungspotential für Namibia - Namibische Delegation auf dem 19. Fachkongress Holzenergie am 25./26. September 2019 in Würzburg](#). Pressemitteilung vom 02.09.19

62 compare with the project commissioned by GIZ [Eigenprojekt des Bundesverbandes Bioenergie e.V. "NamBio"](#) 2020.