



# MASSACHUSETTS MEDICAL SOCIETY

*Every physician matters, each patient counts.*

**TESTIMONY RELATIVE TO  
AN ACT RELATIVE TO DRAFT REGULATIONS OF THE DEPARTMENT OF ENERGY  
RESOURCES  
BEFORE THE COMMITTEE ON TELECOMMUNICATIONS, UTILITIES, AND ENERGY  
AUGUST 2, 2021**

The Massachusetts Medical Society appreciates the opportunity to offer comment to the Joint Committee on Telecommunications, Utilities, and Energy as they exercise their statutory authority to review **Draft Phase 2 Regulations Amending Renewable Portfolio Standard Class I and II Regulations, 225 C.M.R. §§ 14.00 et seq. and 15.00 et seq. (H.3923)**.

The MMS is a professional association of over 25,000 physicians, residents, and medical students across all clinical disciplines, organizations, and practice settings. The Medical Society is committed to advocating on behalf of patients for a healthier Massachusetts, and on behalf of physicians, to help them to provide the best care possible.

The Medical Society acknowledges the critical impact that environmental policy and environmental justice play on the health of the residents of the Commonwealth. Over the past many years, through leadership of the Medical Society's physician Committee on Environmental and Occupational Health, the Society has increased its policymaking and advocacy on issues at the critical intersection of environmental justice and public health. MMS has passed policy on environmental health issues including climate change, air pollution, water quality, and a broad list of energy policies, including biomass.

The Medical Society thus wishes to be on record urging for delay and reconsideration of the proposed regulations which would amend the eligibility criteria and procedures for biomass generation units under the Commonwealth's Renewable Energy Portfolio Standards (RPS) program. Specifically, the Medical Society has policy urging adoption of policies that that scrutinize the approval, permitting, and construction of biomass plants. MMS instead urges promotion of public health, energy efficiency and conservation and near zero-pollutant emissions alongside other renewable energy technologies. While some of the regulatory amendments over the past many months have increased scrutiny of biomass

plants, we continue to believe that biomass should not qualify for renewable energy incentives in Massachusetts. We support Attorney General Healey’s contention that “Biomass energy—and policies that subsidize it—exacerbate climate and environmental justice harms, both by immediately releasing greenhouse gas and other pollutant emissions from burning wood and by damaging or eliminating our forest and natural lands, which serve as critical carbon sinks as we seek to achieve the Commonwealth’s aggressive and necessary climate goals.” The Society therefore believes that regulations permitting biomass plants should be strengthened to instead promote more environmentally sound energy options, as opposed to the current proposal to expand eligibility of biomass plant construction.

While there are countless reasons to oppose expansion of biomass in furtherance of environmental justice, the Medical Society wishes to underscore the public health of the residents of the Commonwealth as a primary consideration to delay and oppose these regulations. Biomass plants contribute to decreased air quality which has long been associated with negative health outcomes. A 2019 study in the *New England Journal of Medicine* analyzed inhaled and fine particulate matter in 652 cities around the world and found “independent associations between short-term exposure to [particulate matter] and daily all-cause, cardiovascular, and respiratory mortality.”<sup>1</sup> In addition, biomass plants contribute to climate change through greenhouse gas emissions. MMS believes that “recent climate changes have had widespread impacts on human and natural systems”; that “climate change will amplify existing risks and create new risks for natural and human systems”; and “that risks are unevenly distributed and are generally greater for disadvantaged people and communities in countries at all levels of development.” We thus again call for additional focus on renewable energy sources in Massachusetts.

As physicians who are guided by the prevailing evidence in any given medical specialty, we support further research and evidence-based policy making for environmental issues as well. As such, we see value in waiting for the Executive Office of Energy and Environmental Affairs to issue its report on greenhouse gas emissions and the public health impacts of biomass generation required under the Commonwealth’s nation-leading Next Generation Roadmap for Massachusetts Climate Policy.

The Medical Society appreciates the opportunity to weigh in on this important matter.

---

<sup>1</sup> C Liu et al, Ambient Particulate Air Pollution and Daily Mortality in 652 Cities, *N Engl J Med* 2019; 381:705-715 DOI: 10.1056/NEJMoa1817364, available at <https://www.nejm.org/doi/full/10.1056/NEJMoa1817364>