

February 23, 2023

Dear Lars Aagaard,

We are a coalition of NGOs based in Europe and North America. We write concerning the Trilogue negotiations on the Renewable Energy Directive revision (REDIII), specifically the role of forest biomass. While we understand there are differences among member state positions, we are profoundly concerned by Council's overall position as put forward by Sweden. If adopted, it will lead to severe and continuing ecosystem damage and make attaining the EU's climate targets impossible. The EU's net-zero target relies on forests as the most important carbon sink, yet the EU forest carbon sink is shrinking, due in part to increased logging of forests for biomass. Accordingly, we ask that Council align its stance on bioenergy with climate science and adopt a position that allows the EU's forests and carbon sink to recover.

There is no controversy that burning biomass emits [more CO₂](#) per unit energy than fossil fuels.¹ Because burning wood emits CO₂ faster than trees regrow, scientists from the European Commission, the [Joint Research Centre](#),² and [internationally](#)³ have concluded that far from being "climate neutral," net CO₂ emissions from burning forest wood can exceed emissions from fossil fuels for decades to centuries. Already in 2016 the Commission [concluded](#)⁴ that "*the use of certain forest biomass feedstocks for energy purposes can lead to substantially reduced or even negative greenhouse gas savings compared to the use of fossil fuels in a given time period (e.g. 20 to 50 years or even up to centuries).*" This is the case even assuming forest regeneration occurs – an increasingly risky assumption, given [drought-driven failures](#).⁵

The Commission's own climate modeling shows that rebuilding the forest carbon sink is essential for achieving net zero by 2050, an objective recognized in the LULUCF Regulation with land carbon sink targets for each member state. Less understood is that the Commission's climate modeling [assumes](#)⁶ that Biomass Energy with Carbon Capture and Storage (BECCS) will provide hundreds of millions of tonnes of CO₂ capture annually in addition to uptake by the land sector. However, as BECCS is not capable of delivering "negative emissions" when it consists of transferring forest carbon into geological storage, protection and restoration of the forest carbon sink is even more crucial for achieving net zero.

Logging and burning forests for fuel is directly undermining the EU's climate and nature objectives. Since 2002, when the EU started promoting burning wood for electricity, the EU has lost a quarter of its land carbon sink. Several countries have seen total loss of the land and/or forest carbon sink, a trend [clearly linked](#)⁷ to biomass harvesting in some cases. Currently, more than half the wood logged in the EU is burned for energy. Some of the rarest, most carbon-rich and biodiverse forests are being logged for wood pellets, for example in [Romania](#)⁸ and in Natura2000 sites in [Spain](#)⁹ and [Estonia](#).¹⁰ The EU's lucrative subsidies for low-efficiency biomass electricity are also driving explosive growth in the wood pellet industry outside the EU, as highlighted by a recent [letter](#)¹¹ to policymakers from 115 NGOs in the US and Canada. For examples of pellet industry impacts on North American forests, see evidence from the [Southeastern US](#)¹² and a recent [BBC documentary](#)¹³ showing wood pellet manufacturers logging pristine temperate rainforests in Canada.

At the end of this letter, we include an annex with data for your country on biomass consumption, the forest/land carbon sink, and the Commission's assessment for how well your National Energy and Climate Plan (NECP) describes biomass impacts on the forest carbon sink. These data make it clear that biomass use is out of control. Even representatives of the wood products manufacturing industry are [increasingly concerned](#)¹⁴ about state support for burning primary woody biomass for energy.

Wood-burning is the [largest source](#) of fine particulate matter in the EU, a pollutant that kills more than 1,000 EU citizens per day prematurely.¹⁵ The recent Commission [impact assessment](#)¹⁶ for the Air Quality Directive concluded that achieving WHO air quality standards would save hundreds of thousands of lives per year and yield net benefits of €38 to €123 billion *annually* for health and the environment. However, the study shows that wood-burning must be steeply reduced to achieve these benefits.

Counting wood-burning toward renewable energy targets when it has so many deeply detrimental effects is simply bad public policy. The Council could help end this. However, Council's current position on forest biomass is not only inconsistent with the science, but also with provisions approved in the RED III itself. Both Council and Parliament endorsed Recital 4, which states, "*Member States should take into consideration the available sustainable supply of biomass for energy and non-energy uses and the maintenance of the national forest carbon sinks and ecosystems as well as the principles of the circular economy and the biomass cascading use, and the waste hierarchy.*" More specifically, Recital 4 seeks to ensure that member states only provide incentives for biomass "*whose sourcing is considered positive for both climate and biodiversity*" "*as identified in the 2021 report of the Joint Research Centre entitled 'The use of woody biomass for energy production in the EU'.*"

What would a policy consistent with Recital 4 look like? The JRC report was [clear](#)¹⁷ that harvesting and burning stemwood and coarse woody debris, stems and roots (defined by the JRC at question 9 of its [FAQ](#)¹⁸) is "high risk" for the climate and biodiversity. **Accordingly, these types of wood should be excluded from qualifying under the RED, and a scientifically correct definition of primary woody biomass must be adopted.** The Parliament and now the Commission have offered definitions for biomass that approach Recital 4's goal, though both contain important and damaging loopholes, including the exception of wood from salvage logging (now comprising up to half of total logging) and the Commission's proposal to leave the definition of "industrial roundwood" up to Member States. Such exclusions are [not consistent](#)¹⁹ with the findings of the JRC, and would permit vast quantities of forest biomass to continue to qualify in the RED.

Despite this expansive definition of forest biomass that would continue to qualify under the RED, the Council has resisted any change to its proposal to solely disqualify "quality roundwood," a functionally meaningless definition that would do nothing additional to protect forests and climate as such high-value wood is rarely burned in any case. Further, the Council's rejection of specific protections for old growth and primary forests and continued endorsement of the "risk-based" approach will ensure the continued destruction of these carbon-rich ecosystems, which are often a special target of the biomass industry precisely because of their carbon density. **The risk based approach needs to be changed in favour of the European Parliament and Commission approach that provides specific protections congruent with those provided in the sustainability criteria for agricultural biomass** (for why the risk-based approach fails to protect forests, see Appendix 1 of the [NGO rebuttal](#) of Joint Letter on Bioenergy²⁰).

Finally, we've seen a great deal of misinformation endorsed by some of the member states, such as that promoted in the "Joint Letter on Bioenergy." It is essential to recognize that reducing the amount of forest biomass combustion counted toward renewable energy targets does not in any way constitute a "ban" on wood-burning or influence the availability of wood for this winter, the next, or even the one after that. Instead, continued dependence on wood-burning to meet renewable energy targets ["bloats" renewable energy accounts](#)²¹ and locks EU citizens into energy poverty and dependence on this dirty technology. Further, simple calculations show it is highly [unrealistic](#)²² to claim that additional wood-burning can replace a meaningful proportion of Russian fossil fuels.

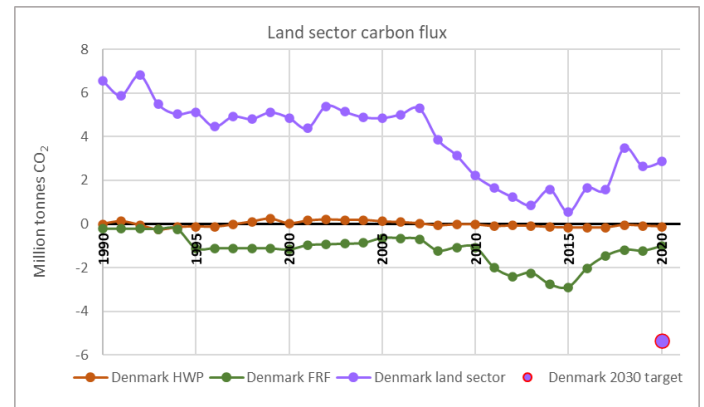
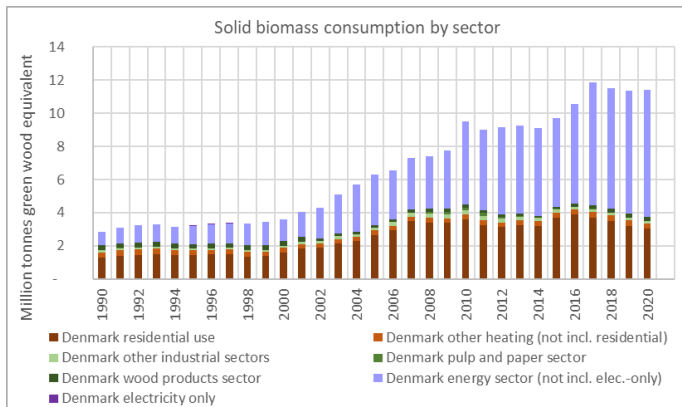
In conclusion, dear ministers, please remember that policies continuing business as usual will condemn the EU (and the planet) to climate failure and overshoot of CO₂ targets by 2030 and beyond. Renewable energy policy that promotes logging forests for fuel, directly undermining the EU's objective of restoring forests and the forest carbon sink, is destructive and dangerous. You must follow the science and deliver a policy that serves people and the planet. We need clean renewable energy, healthy ecosystems, and a robust forest carbon sink. We need to restore and protect forests, not burn them for fuel.

Thank you for your consideration.

Forest Biomass Out of RED Coalition and International Allies
(lists of NGOs and previous NGO statements on forest biomass are available [online](#)²³).

On behalf of NOAH,
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Annex: Biomass consumption or production (data from Eurostat) and the land carbon sink (data from UNFCCC²⁴). These and data on sectoral use of biomass can be found in a recent [report](#).²⁵ Quotes are from the Commission [reviews](#) of draft NECPs.²⁶



Denmark: Provide additional details on the specific measures to ensure sustainability for biomass supply and use in the energy sector, given the important contribution of biomass across the Danish energy mix...there is no inclusion of trajectories on biomass supply, by feedstocks and origin and trajectories for forest biomass, an assessment of its source and impact on the LULUCF sink, which is however especially important given the prominent role of bioenergy in the draft NECP.

¹ <https://forestdefenders.eu/biomass-plant-co2-emissions-an-explanation/>

² https://forestdefenders.eu/wp-content/uploads/2021/03/JRC-study-biomass-study-overview_final.pdf

³ <https://www.wwf.eu/?2128466/500-scientists-tell-EU-to-end-tree-burning-for-energy>

⁴ https://eur-lex.europa.eu/resource.html?uri=cellar:1bdc63bd-b7e9-11e6-9e3c-01aa75ed71a1.0001.02/DOC_1&format=PDF

⁵ https://youtu.be/17STxMCD_80

⁶ <https://www.pfpi.net/wp-content/uploads/2023/01/PFPI-EU-Land-Sink-Target-report-Nov-23-2021.pdf>

⁷ <https://forestdefenders.eu/wp-content/uploads/2022/11/PFPI-Burning-up-the-carbon-sink-Nov-7-2022.pdf>

⁸ <https://nyti.ms/3uaG16i>

⁹ <https://www.observatoriosostenibilidad.com/2022/11/26/16206/>

¹⁰ <https://www.theguardian.com/world/2021/jan/14/carbon-neutrality-is-a-fairy-tale-how-the-race-for-renewables-is-burning-europes-forests>

¹¹ <https://forestdefenders.eu/115-us-and-canadian-ngos-to-eu-for-how-long-will-you-keep-destroying-our-forests-for-fuel/>

¹² <https://www.nrdc.org/sites/default/files/global-markets-biomass-energy-devastating-us-forests-202209.pdf>

¹³ <https://vimeo.com/795555785/c6e9420ff6>

¹⁴ <https://forestdefenders.eu/wood-product-manufacturers-speak-out-against-burning-wood-for-energy/>

¹⁵ <https://forestdefenders.eu/wp-content/uploads/2021/05/FDA-air-pollution-factsheet.pdf>

¹⁶ https://environment.ec.europa.eu/publications/revision-eu-ambient-air-quality-legislation_en

¹⁷ https://knowledge4policy.ec.europa.eu/publication/use-woody-biomass-energy-production_en

¹⁸ https://knowledge4policy.ec.europa.eu/bioeconomy/faq-study-use-woody-biomass-energy-production-eu_en

¹⁹ <https://forestdefenders.eu/burning-salvaged-wood-should-not-count-as-renewable-energy/>

²⁰ Appendix 1 at <https://forestdefenders.eu/wp-content/uploads/2023/02/NGO-response-to-Joint-paper-on-bioenergy-Feb-6-2023.pdf>

²¹ <https://www.euractiv.com/section/energy-environment/news/exposed-how-eu-countries-use-firewood-to-bloat-their-renewable-energy-stats/>

²² <https://forestdefenders.eu/replacing-just-10-of-russian-fossil-fuels-with-wood-will-obliterate-even-more-forests/>

²³ https://forestdefenders.eu/resources-on-biomass/#NGO_position_statements

²⁴ <https://unfccc.int/ghg-inventories-annex-i-parties/2022>

²⁵ <https://forestdefenders.eu/wp-content/uploads/2022/11/PFPI-Burning-up-the-carbon-sink-Nov-7-2022.pdf>

²⁶ https://energy.ec.europa.eu/topics/energy-strategy/national-energy-and-climate-plans-necps_en#commission-assessment-of-the-final-necps