

NGOs are concerned that the published Renewable Energy Directive (RED) revisions will not reduce harvesting pressure on forests as necessary for ecosystem restoration and climate mitigation, and that continued dependence on burning wood for renewable energy will undermine the EU's ability to reduce emissions. Despite sustained opposition from over 100 European environmental NGOs, scientists and over 250,000 members of the public, the European Commission continues to promote burning forest wood for energy in its revised RED proposal, say environmental groups.

Part of the EU's "Fit for 55" package, the revised RED is supposed to contribute to the EU's goal of reducing emissions to 55% of 1990 levels by 2030. Burning forest biomass is controversial because it emits more carbon dioxide per unit energy than fossil fuels, and the European Commission's own scientists have acknowledged that forests grow too slowly to offset emissions in a timeframe consistent with the EU's emission reduction targets. Scientists have sounded the alarm that intensified logging for biomass is degrading forests, prompting calls for reform of biomass policies in the current revision of the RED. Changes proposed in the RED revision include:

-Member states are no longer allowed to grant support for the use of saw logs, veneer logs, stumps and roots to produce energy. By the EC's own data, however, such materials comprise only a small fraction of the forest wood burned for energy.

-From 2027 onward, member states can no longer grant subsidies to electricity-only installations burning forest biomass, unless it occurs in a region especially dependent on fossil fuels, or it is used with carbon capture and storage. This provision however continues to allow biomass burning in old coal power stations, specifically in countries with a high coal dependency.

-The EC will adopt a delegated act on how to apply the cascading principle to biomass, and how to reduce the use of "quality roundwood" for energy production. This is a step in the right direction if it recognizes the importance of prioritizing material use over burning wood for energy, but its relevance is diminished considering that about half the wood harvested in the EU is burned for energy, and the revisions do not do anything to reduce this.

-Sustainability criteria in the existing RED are amended to require that harvesting consider how to maintain soil quality and biodiversity, avoid harvesting stumps and roots, avoid degradation of primary forests or conversion to plantation forest, minimize large clear-cuts and encourage retention of deadwood on-site. These provisions however apply to relatively little of the biomass actually burned in the EU, because primary forests only represent about 3% of Europe's forests, and stumps and roots are hardly ever burned for energy in any case. -The revised RED applies the "sustainability" criteria to installations above 5 MW –



previously it was 20MW. However, the sustainability criteria do not address the central issue with biomass, that harvesting and burning wood for energy increases emissions and degrades forests.

While the EU's Biodiversity Strategy called for reducing harvesting pressure on forests, none of the proposed revisions to the RED call for a reduction in harvesting. As in the former version of the RED, the document continues to claim that burning biomass reduces emissions compared to fossil fuels, in defiance of findings by the EC's own scientists. Dr. Mary Booth, Director of the Partnership for Policy Integrity, a scientist working to protect and restore forests, said: Increasing renewable energy targets on the back of forests is a mistake of global proportions. When the EU claims to reduce fossil fuel use and emissions, but burns more forest wood, emissions and forest degradation increase. It is tragic that the EC did not take the opportunity for meaningful reform of its biomass policies. EU policymakers' refusal to acknowledge the science on biomass is virtually indistinguishable from climate change denial.

Kenneth Richter, Natural Resources Defense Council (NRDC) EU Policy Lead said: The Commission has accepted the logic that subsidies for the burning of high quality logs should be reduced. Now that same logic needs to be applied to ALL forest biomass as burning wood of any quality increases emissions over climate-relevant time scales. The bioenergy industry is profiting on a huge scale from taxpayers' money – we are all unwittingly bankrolling the burning of trees and destruction of our last remaining green spaces.

## Insufficient protection for Europe's forests and biodiversity

Whether stemwood or "forestry residues," harvesting forest wood for fuel degrades forest ecosystem function and biodiversity. The RED revision advises against harvesting in primary forests, but does not ban this practice altogether. Since primary forests constitute a tiny proportion of EU forests overall, this advice leaves 97% of the EU's forests unprotected. Jana Ballenthien, forest campaigner of the German environmental organization ROBIN WOOD said: "In times of climate crisis and rapid species extinction we cannot bear any more wrong steps in forest and energy policy. Species extinction is just as lethal for us as climate change. If we don't focus on renewable energies like wind power and solar now, but continue to destroy valuable forests, we will lose too many habitats and species forever – and with them an important part of our livelihood as well.

Peter Wohlleben, world-renowned German forester and long-time critic of the EU's forest practices said: More than just allies in the climate emergency, forests fortify our health and clean our air and water. The sad reality is that the EU's own energy policies have



encouraged the burning of forest wood for energy and accelerated the deterioration of Europe's forests. Reversing the damage requires a reduction in harvesting, but this proposal will not deliver that.

Lina Burnelius, Project leader and international coordinator at Swedish organisation Protect the Forest, said: Forests are not renewable, it's an ecosystem, one that can be restored but not replanted. One can plant trees but not forests. We need less burning and fewer monocultures. A straightforward way to reduce conversion from forests into monocultures is to remove subsidies and other incentives that are driving increased logging for biomass fuels. Instead, today the Commission chose to support both offsetting and energy from burning biomass. "Fit For 55" is unfit for forests and insufficient to tackle climate change. We are in desperate need for honesty policy which include all of our emissions in our statistics, once again we got harmful window-dressing.

## Ongoing air pollution and threats to human health

Burning wood is a significant source of the fine particulate pollution that is currently estimated to kill nearly 400,000 Europeans per year. Despite concerns about human health raised in the Commission's initial impact assessment, the proposal released today does not address the issue.

Fenna Swart, Campaign Director at the Dutch organization Clean Air Committee, reacted: Despite the Dutch government's acknowledgment that biomass combustion can no longer be a solution, the RED proposal continues to promote it. The logging abuse and forest degradation uncovered by multiple studies across the EU will continue under this proposal. Nor does the proposal address air pollution. iBiomass incineration remains the worst alternative because it emits carbon, nitrogen, ultra-fine particles and other very damaging substances such as heavy metals, mercury and furans. This is no Green Deal solution.

## A call to the European Council and Parliament

It is vital that the EU quickly reduces its dependence on forests for fuel by disqualifying forest biomass from its renewable energy targets. Environmental groups now call on the European Council and European Parliament to reject the continued exploitation of forests for fuel and ensure the EU's renewable energy targets are met by truly clean and low-emissions technologies such as wind, solar and geothermal. Source: forestdefenders.eu