



Open Letter

9. December 2020

**To:** Executive Vice-President Frans Timmermans

**Cc:** Commissioners Kadri Simson, Janusz Wojciechowski, Mariya Gabriel, Margrethe Vestager, Virginijus Sinkevičius, Mairead McGuinness, Valdis Dombrovskis.

**Re: Ending EU support for burning trees and crops for energy**

Dear Executive Vice-President,

On behalf of 14 civil society organisations, we are writing about the review of the Renewable Energy Directive (RED). We believe it should aim for a RED which is compatible with the European Green Deal. This will require a fundamental change in EU incentives for the burning of forest biomass and crops for energy.

For many years, EU policies have encouraged the burning of types of bioenergy that *increase* emissions compared to fossil fuels. Member States are subsidising this harmful industry to the tune of billions of euros every year. The hugely negative unintended consequences of EU biofuel policies have already been under discussion for a while now, but the impacts of the EU's incentives for burning forest biomass are no less alarming or counterproductive (see photos below).

This cannot be allowed to continue. It is a stain on the EU's climate leadership and directly contradicts the EU's aim of increasing carbon storage in forests and other ecosystems. But there is nothing in the revised RED or the revised Land Use, Land Use Change and Forestry (LULUCF) Regulation that will stop it happening:

- The calculation for GHG savings in the RED focusses entirely on life-cycle emissions from fossil fuel combustion and N<sub>2</sub>O emissions from fertiliser use on tree plantations (with land use change not being a relevant factor in

relation to forest wood). It completely ignores all the major factors in the equation, notably the emissions from actually burning the biomass, the emissions from indirect land use change, changes in forest carbon stocks and the impact of forgone sequestration. As stated in a [letter from scientists](#), this approach is equivalent to “estimating the emissions from coal by counting emissions from coal-mining machinery but not from burning the coal itself”.

- There are requirements in the RED on Sustainable Forest Management (SFM) but these are in no way a proxy for the climate impact of burning specific feedstocks. Logging forests for energy purposes will typically increase emissions for [decades or even centuries](#) compared to coal, regardless of how sustainably the forests in question were managed.
- RED and LULUCF criteria relating to carbon stocks and land use accounting are similarly inadequate, as detailed in [this recent report](#) from Forest Research and [this letter from scientists](#).

Unless and until the EU seriously reforms its bioenergy policies they will continue to undermine our climate and biodiversity objectives and our commitment to the Sustainable Development Goals, and cause serious harm to the EU’s international reputation.

This is also an issue that citizens care deeply about: In recent petitions, over 100 civil society organisations have collected approx. 100,000 signatures from people that are calling for a fundamental review of the way bioenergy is treated in the Renewable Energy Directive.

We therefore ask you to make this a priority in your revision of the EU’s climate and energy legislation and stand ready to work with you and other stakeholders to come up with a robust and resilient regime that puts this issue to bed.

To this end we would be very grateful for the opportunity of a meeting with you and your team, in order to present our views on these issues in further detail, and discuss potential solutions.

Sincerely,

Ariel Brunner  
Acting director  
Birdlife Europe

Debbie Hammel  
Deputy Director, Lands Nature Program  
NRDC

Julia Christian  
Campaigns coordinator  
Fern

Ester Asin  
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David Carr  
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Southern Environmental Law Center

Adam Colette  
Program Director  
Dogwood Alliance

## Appendix: the impact of EU bioenergy policies



Estonia: A mixed forest clear-cut in Tammiku village, Väike-Maarja parish, Lääne-Viru County, 2020



Log stacks at Osula Graanul Invest pellet mill in Võru County, Estonia, 2019



Truck transporting logs to Ecopower pellet factory in Ham, Belgium, 2017.



Biomass trunk wood at the Cuijk biomass power plant - photo: Paul Rapp

Biomass trunk wood at the Cuijk biomass power plant, the Netherlands (photo Paul Rapp, from "Biomassale Kaalkap" 2019 film)



Truck with roundwood entering TeHo Bardejov biomass power plant in Bardejov, Slovakia, 2019.



Clearcut for whole hardwood trees and other large-diameter wood tracked back to Enviva Sampson County pellet facility, North Carolina, 2017. Later photos [here](#).



Log truck entering Enviva biomass plant in Ashokie, which manufactures and exports wood pellets to the EU. North Carolina, 2017



ENVIVA pellet plant, Sampson County, North Carolina, 2017.