

# The EU Renewable Energy Directive recast

## An opportunity to help meet climate and biodiversity objectives

The European Union's (EU) Renewable Energy Directive (RED) has had a devastating effect on forests, but is now being amended as part of the European Green Deal. This is a major opportunity to ensure it supports, rather than undermines the EU's climate and biodiversity objectives.

This is an issue that people care deeply about. Nearly 200,000 people recently signed petitions ([here](#)<sup>1</sup>, [here](#)<sup>2</sup> and [here](#)<sup>3</sup>) calling for a fundamental review of how forest biomass is treated in the RED.

The European Commission is expected to propose changes to the RED in July 2021, and these will then be scrutinised by the European Parliament and Council. This position paper outlines what needs to happen for the EU to create a more science-aligned bioenergy policy that civil society and citizens can support.

## The Problem(s)

EU support for bioenergy has dramatically increased the burning of forest biomass and agricultural crops for energy, causing numerous problems for the climate, for wildlife, and for the people who rely on forests for respite, especially during these COVID times. It has also meant that billions of Euros in subsidies have been spent on fake solutions like keeping old coal-burning power plants going with biomass rather than allocating the money to cleaner alternatives such as wind and solar. The following issues are of particular concern:

- **Burning biomass can increase emissions compared to fossil fuels:** Burning primary woody biomass typically increases emissions for decades or even centuries<sup>4</sup> compared to coal, whereas emissions reductions and removals need to happen now. Most EU biofuels used for transport not only undermine food security but are worse for the climate than fossil fuels, as growing EU demand for crops like palm oil or soy is driving deforestation.



1 <https://www.regenwald.org/petitionen/1228/die-eu-muss-waelder-schuetzen-statt-sie-in-kraftwerken-zu-verbrennen>

2 <https://you.wemove.eu/campaigns/the-eu-must-protect-forests-not-burn-them-for-energy>

3 [https://act.nrdc.org/sign/5415-se-eu-biomass-201117?source=WBSSEBPET&\\_ga=2.99660702.1053443676.1620391975-868217370.1584367778](https://act.nrdc.org/sign/5415-se-eu-biomass-201117?source=WBSSEBPET&_ga=2.99660702.1053443676.1620391975-868217370.1584367778)

4 [https://www.dropbox.com/s/18sx5bl0h02x395/Scientist%20Letter%20on%20EU%20Forest%20Biomass\\_ENGLISH.pdf?dl=0](https://www.dropbox.com/s/18sx5bl0h02x395/Scientist%20Letter%20on%20EU%20Forest%20Biomass_ENGLISH.pdf?dl=0)

■ **EU climate and energy policies don't secure climate benefits:** The EU's Joint Research Centre has [concluded](#)<sup>5</sup> that of 24 forest biomass pathways analysed, 23 pose a risk to biodiversity, or fail to achieve emission savings compared to fossil fuels within one or two decades, or both. Yet, the RED contains no provision to guarantee that support is only given to feedstocks that secure climate benefits, as the criteria for greenhouse gas savings don't consider emissions from the loss of carbon stocks like forests.

■ **Accounting for emissions in the land sector doesn't 'fix' the problem:** Both [research institutions](#)<sup>6</sup> and independent [scientists](#)<sup>7</sup> have clearly stated that current carbon accounting in the land sector is flawed for forests and bioenergy, but that even if requirements were made stronger it "*would have no serious effect because it would not alter the incentive the directive gives to power plants and others to import wood*

*from another country even when doing so increases net emissions for decades."*

■ **European forests are already under pressure:** EU forests are already heavily harvested and member states have [estimated that 79 per cent of valuable forest habitats](#)<sup>8</sup> are threatened by forestry activities. In addition to this, forest carbon sinks are decreasing and set to reduce by a third by 2030. Globally, it's been estimated that if the world supplied only an additional [two per cent](#)<sup>9</sup> of its energy from wood, it would double commercial wood harvests from forests.

■ **Burning drives air pollution:** Wood burning is [now the biggest source](#)<sup>10</sup> of hazardous fine particles in the EU, even above those from road transport. In 2018, fine particulate matter pollution was responsible for about 379,000 premature deaths in the EU-28.

5 <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/use-woody-biomass-energy-production-eu>

6 <https://www.fern.org/publications-insight/the-eu-lulucf-regulation-help-or-hindrance-to-sustainable-forest-biomass-use-2268/>

7 [https://www.dropbox.com/s/om5h9f4g7a90dn9/Second%20scientists%20letter%20to%20lead%20European%20Parliament%20negotiators%20regarding%20biomass%20rules%20in%20renewable%20energy%20directive\\_June%202018.pdf?dl=0](https://www.dropbox.com/s/om5h9f4g7a90dn9/Second%20scientists%20letter%20to%20lead%20European%20Parliament%20negotiators%20regarding%20biomass%20rules%20in%20renewable%20energy%20directive_June%202018.pdf?dl=0)

8 [https://www.fern.org/fileadmin/uploads/fern/Documents/2021/2021\\_bioenergy\\_facts\\_sheet.pdf](https://www.fern.org/fileadmin/uploads/fern/Documents/2021/2021_bioenergy_facts_sheet.pdf)

9 <https://news.mongabay.com/2021/02/500-experts-call-on-worlds-nations-to-not-burn-forests-to-make-energy/>

10 <https://www.clean-heat.eu/en/actions/info-material/download/background-paper-residential-wood-burning-3.html>

## The Solution(s)

To be compatible with the European Green Deal ambitions and turn the EU's renewable energy policy from a climate problem to a climate solution, the RED must stop counting primary woody biomass towards renewable energy targets, and phase out crop-based biofuels (which may otherwise get a new lease of life to support aviation and shipping).

Specifically the EU must:

- **Remove** primary woody biomass from the list of eligible fuels in the RED.
- **Stop** treating biomass as a "zero carbon" fuel in the EU Emissions Trading System (ETS).
- **Only support** the burning of residues from wood products manufacturing and post-consumer wood (secondary woody biomass) if it cannot be turned into material products.
- **Stop** counting crop based biofuels, including from oilseed rape, palm oil and soy, towards RED targets.

- **Exclude** high risk feedstocks from the list of sustainable advanced biofuels, such as crude tall oil which has indirect emissions and biodiversity impacts, and which could be used more effectively.
- **Reduce** energy use by increasing the energy efficiency of buildings.
- **Gear up efforts to reduce energy consumption in the transport sector** and support the long-term decarbonisation of the transport sector by phasing out new internal combustion engines, through modal shift, reduction in transport demand, and through additional incentives for renewable electricity in the RED.
- **Support** wind, solar, heat pumps and geothermal.

If the RED were to take these recommendations into account, it would not only help achieve climate goals, it would also help achieve more land for local food production, promote the forest restoration goals of the Biodiversity Strategy, increase green spaces for wildlife and local communities, and reduce air pollution.