

## Memo on leaked RED biomass proposal and suggestions for improvement

June 21, 2021

**Topline message:** The leaked biomass proposals<sup>1</sup> are a disaster. The only practical way to reduce emissions and rebuild the forest carbon sink is to reduce logging by taking forest biomass out of the renewable energy directive. It must be phased out over the next couple of years. This does *not* mean “nobody can burn wood” - it just means that EU policy will no longer promote as “good for the climate” activities that destroy forests, increase emissions, and degrade the EU’s carbon sink.

**The future of forests and climate depends on making the right decision.**

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**There are three main problems with burning forest biomass for energy.**

1. **Climate:** Burning any biomass emits more CO<sub>2</sub> than burning fossil fuels at the smokestack. As European Commission scientists have stated,<sup>2</sup> for forest biomass, cumulative net emissions can exceed those from burning fossil fuels for decades to centuries, even if trees are assumed to grow back.
2. **Forests:** The Joint Research Centre’s report on forest biomass<sup>3</sup> concluded that harvesting biomass seriously harms forest biodiversity and ecosystem function – even when it’s “just” removal of residues.
3. **Air pollution:** Burning biomass is the largest source of particulate pollution in the EU, a pollutant that kills hundreds of thousands of EU citizens each year.<sup>4</sup> The failure to address air pollution from biomass was one of the reasons cited by the Regulatory Scrutiny Board<sup>5</sup> in their rejection of the first impact assessment.

The leaked draft is shockingly bad because it does nothing to address these three concerns. It continues to offer false solutions – a kind of climate “gaslighting” that is unacceptable given the accepted science on this issue.

**We have offered draft legislative language that address these imperatives in a memo<sup>6</sup> and a mark-up of the RED.<sup>7</sup>** Unlike the leaked draft, our proposal would actually reduce GHG emissions and be a meaningful step toward rebuilding the EU’s forest carbon sink.

<sup>1</sup> [https://forestdefenders.eu/wp-content/uploads/2021/06/Paquet\\_climat\\_-\\_revision\\_directive\\_energies\\_renouvelables\\_RED\\_II.pdf](https://forestdefenders.eu/wp-content/uploads/2021/06/Paquet_climat_-_revision_directive_energies_renouvelables_RED_II.pdf)

<sup>2</sup> A 2016 impact assessment on bioenergy sustainability (at [https://eur-lex.europa.eu/resource.html?uri=cellar:1bdc63bd-b7e9-11e6-9e3c-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:1bdc63bd-b7e9-11e6-9e3c-01aa75ed71a1.0001.02/DOC_1&format=PDF)) acknowledged the obvious problem:

“compared to crops which regrow over short periods, forest biomass is part of a much longer carbon cycle. A forest stand typically takes between decades and a century to reach maturity. Recent studies have found that when greenhouse gas emissions and removals from combustion, decay and plant growth (so-called biogenic emissions from various biological pools) are also taken into account, **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).**”

The assessment specifically rejected the equivalence of “sustainability” and carbon neutrality:

“Certain forest management practices can enhance the carbon sink, but **ensuring that the harvest level stays below the growth rate of the forest is not sufficient to ensure climate change mitigation.**”

<sup>3</sup> [https://forestdefenders.eu/wp-content/uploads/2021/03/JRC-study-biomass-study-overview\\_final.pdf](https://forestdefenders.eu/wp-content/uploads/2021/03/JRC-study-biomass-study-overview_final.pdf)

<sup>4</sup> <https://forestdefenders.eu/wp-content/uploads/2021/05/FDA-air-pollution-factsheet.pdf>

<sup>5</sup> <https://forestdefenders.eu/the-ec-offers-business-as-usual-in-their-proposal-to-reform-biomass-policies/>

<sup>6</sup> At <https://forestdefenders.eu/wp-content/uploads/2021/05/Memo-on-proposed-RED-biomass-revisions-May-7-2021.pdf>

<sup>7</sup> At <https://forestdefenders.eu/wp-content/uploads/2021/05/RED-revisions-May-10-2021-THIS-VERSION-HAS-ADDED-PAGES.pdf>

## We need to reduce emissions and re-build the forest carbon sink

The proposal states (p. 9) that “*the overarching aim of this review is to increase the use of renewable energy and reduce GHG emissions.*” Specifically, the goal is to reduce GHGs by 55% by 2030 and be C neutral by 2050. Unfortunately, the RED and GHG reduction goals are not aligned, because the RED promotes burning forest biomass, and forest biomass is not carbon neutral. **It is not possible to achieve carbon neutrality with heavy reliance on a technology that is not carbon neutral.** Liquidating forest carbon into the atmosphere and counting the emissions as “zero” will not actually reduce GHG emissions, except on paper. It is like trying to store water in a leaky bucket.

Nor will the EU fully count biomass emissions in the LULUCF regulation, because the forest reference levels ensure that all current use of biomass, plus a great deal of an planned future increase, is counted as zero in both the land sector and the energy sector.<sup>8</sup> But be assured: The atmosphere does not count it as zero.<sup>9</sup>

## We must reduce logging *now* to give forests a chance to regrow

A recent briefing<sup>10</sup> from the JRC cites a study they co-authored showing that the only pathway to increasing the EU forest carbon sink is by reducing harvesting, with a 20% decrease in logging producing a measurable improvement in forest carbon storage in the modeling scenario they ran.<sup>11</sup> **Since more than half the wood harvested in the EU is currently burned for energy, this is the obvious place to start reducing forest biomass use and rebuilding forest ecosystems.** The authors of the leaked forest strategy apparently agree.<sup>12</sup>

Accordingly, forest biomass should not count in the RED as renewable energy, and secondary woody biomass (mill residues, etc.) should only count if there is no “higher” use for material products.

## None of the proposed measures in the leaked draft will reduce GHG emissions, forest harvesting, or air pollution

### Not pretending that burning biomass “reduces” emissions compared to fossil fuels...

It is shocking to see the draft continue to insist that burning biomass “reduces” emissions compared to fossil fuels (New recital 27: “*In addition, the greenhouse gas emission saving criteria should also apply to existing biomass-based installations to ensure that bioenergy production in all such installations leads to greenhouse gas emission reductions compared to energy produced from fossil fuels.*”) Given the clear science that burning biomass increases emissions for decades to centuries, including in reports published by the JRC, this is nearly indistinguishable from climate change denial.

### Not reducing size threshold of facilities regulated...

**Proposed text:** (26) *To ensure higher environmental effectiveness of the Union sustainability and greenhouse emissions saving criteria for solid biomass fuels in installations producing heating, electricity and cooling, the minimum threshold for the applicability of such criteria should be lowered from the current 20 MW to 5 MW.*

Since the sustainability criteria are a paper tiger,<sup>13</sup> applying them to more facilities won’t accomplish anything. Even with the reduction in the size threshold, more than 60% of the wood burned in the EU is for residential heating – and none of this would be covered by the criteria, including the wood pellet industry in the EU that serves the residential and small-scale market.<sup>14</sup>

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<sup>8</sup> See page 21 at <https://forestdefenders.eu/wp-content/uploads/2021/05/PFPI-critique-of-RED-impact-assessment-May-17-2021.pdf>

<sup>9</sup> We encourage policymakers who still do not understand this to refrain from making policy on it until they do understand it.

<sup>10</sup> <https://publications.jrc.ec.europa.eu/repository/handle/JRC124374>

<sup>11</sup> Pilli, R., et al. (2017). “The European forest sector: Past and future carbon budget and fluxes under different management scenarios.” 14: 2387-2405.

<sup>12</sup> The authors of the leaked forest strategy apparently agree. <https://forestdefenders.eu/wp-content/uploads/2021/06/FDA-Forest-Strategy-briefing-June-17.pdf>

<sup>13</sup> <https://forestdefenders.eu/wp-content/uploads/2021/05/RED-II-biomass-Paper-Tiger-July-6-2020.pdf>

<sup>14</sup> There are over 400 wood pellet plants in the EU; 180 sell just bagged pellets; the majority sell both bagged pellet and do small bulk deliveries. Many of these would not be covered by the size threshold because they do not sell to large enough facilities.

### Not putting primary forests off limits...

**Proposed text:** *To achieve an enhanced protection of especially biodiverse and carbon-rich habitats, such as primary forests, highly biodiverse forests, grasslands and peat lands, exclusions or limitations to source forest biomass from those areas should be included, in line with the approach for biofuels, bioliquids and biomass fuels produced from agricultural biomass.*

While primary and biodiverse forests should unquestionably be off-limits to all harvesting, only a tiny percentage of the EU's forests are "primary" forests, and there is no definition of what constitutes a "highly biodiverse" forest. This provision will thus not apply to the overwhelming majority of forests that are being harvested for fuel. If the EC were serious about protecting forests, the proposal would extend the Article 29(4) provisions on agricultural biomass to forest biomass as well, which would exclude areas with "high carbon stock," including all forested land, and so exclude forest biomass from the RED. Given how fast we need to reduce emissions, and how slowly forests regrow, there isn't a big difference between "deforestation" rightly prohibited by the agricultural biomass provisions, and clearcutting forests for woody biomass, which is allowed and even encouraged by the RED's forest biomass sustainability provisions.

### Not expanding applicability of GHG saving criteria...

**Proposed text:** *In addition, the greenhouse gas emission saving criteria should also apply to existing biomass-based installations to ensure that bioenergy production in all such installations leads to greenhouse gas emission reductions compared to energy produced from fossil fuels.*

The GHG reduction criteria only apply to GHG's from manufacturing and transporting biomass fuels, not burning them. Further, the EU's criteria are extremely weak compared to criteria already adopted in the UK.<sup>15</sup>

### Not minimizing use of "high quality stemwood"...

**Proposed text:** *'3. Member States shall ensure that their support schemes promoting bioenergy are designed in accordance with the biomass cascading principle, and the waste hierarchy as set out in Article 4 of Directive 2008/98/EC to avoid undue distortive effects on the raw material markets, in particular by minimising the use of [high quality stemwood] for energy. Member States shall grant no support for renewable energy produced from the incineration of waste if the separate collection obligations laid down in that Directive have not been complied with.'*

The problem is not that the biomass industry is burning "high quality stemwood." The problem is that logging and burning *any* forest wood, even low-quality wood, emits CO<sub>2</sub> and degrades forests. Further, as what wood is valuable is strictly a function of market conditions, the provision is practically unenforceable. Finally, the definition of "high quality stemwood" (revision to Article 2) makes it clear an enormous amount of material is excluded from this definition.<sup>16</sup>

## The practical answer

Taking forest wood out of the RED is the only practical solution that reduces carbon emissions, reduces logging, reduces deadly air pollution, and helps redirect billions of euro in renewable energy subsidies toward true zero-emissions renewable energy and forest restoration. It's the solution that gives some integrity to the EU's renewable energy program and it's the *peoples'* choice – because people overwhelmingly want to restore forests, not log them for fuel.

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<sup>15</sup> See p. 7 and p. 38 at <https://forestdefenders.eu/wp-content/uploads/2021/05/RED-II-biomass-Paper-Tiger-July-6-2020.pdf>

<sup>16</sup> (66) [*'high quality stemwood' means wood of the stem or stems of a tree, including wood in main axes and in major branches, whose characteristics, such as species, dimensions, rectitude, and node density, make it suitable for industrial use, as defined and duly justified by Member States according to the relevant forest conditions. This does not include coppice forests, first thinning operations or trees extracted from forests affected by fires, pests, diseases or damage due to abiotic factors or growth conditions.*']