



ESTONIAN FUND FOR NATURE



Luonto-Liitto



Council Presidency
Minister of Ecological Transition
Barbara Pompili,
Vice-President Timmermans,
Commissioner Simson,
Dear Ministers,

February 21st 2022

On the 19th January, before the informal **energy Council**, you received a letter¹ from several European Member States' Ministers in relation to the Commission's proposal to strengthen the bioenergy sustainability criteria in the Renewable Energy Directive (RED).

We the undersigned non-governmental organisations of the same member states are now reaching out to you in this open letter in order to draw your attention to scientific evidence that was clearly ignored by these ministers.

Burning of forest biomass for energy is not in line with the EU's emission reduction targets. We need to decrease our emissions at the source while simultaneously increasing the forest carbon sinks. Whereas burning of forest biomass does the opposite; over the coming decades it will increase emissions and decrease the forest carbon sinks².

The EU is heavily dependent on the burning of forest biomass in order to meet its so-called renewable targets, but precious forest habitats are not renewable.

Already about half of what is harvested in the EU is burnt for energy, and according to Commission projections under the RED, combustion and forest biomass might increase by 50%. This increase of forest biomass burning is the result of two massive EU incentives, the RED enabling Member States to financially support companies burning forest biomass as a renewable energy source, and biomass emissions being considered as zero in the EU ETS which gives biomass burning companies a big competitive advantage as they do not need to buy carbon credits for their huge GHG emissions.

¹ <https://twitter.com/LBurnelius/status/1485542544725450752?s=20&t=oOm8OBz-Uzw7wZkdglNhXg>

² <https://publications.jrc.ec.europa.eu/repository/handle/JRC122719>

If these climate contradicting incentives aren't removed the current RED and ETS will exacerbate logging rates. Globally, it's been estimated that if the world supplied only an additional 2% of its energy from wood, it would *double* commercial wood harvests from forests³. Currently forest biomass comes from the so called 'Sustainable Forestry Model' (SFM) which constitutes clear-cutting of natural forests in order to replace them with harmful tree plantations, causing a decline in species by ruining their habitats. Around 79 % of valuable EU forest habitats are threatened by forestry activities⁴. Consequently, the ability of forests to absorb CO₂ – to act as carbon “sinks” - is decreasing, and is on track to decline further. The EU needs to significantly *increase* its land sink – which is mainly composed of forests.

The *Swedish National Institute of Economic* (KI) latest environmental economic report states that the carbon sequestration capacity of forests must play a greater part in climate policy. According to KI, *"Leaving forests standing to sequester carbon is more beneficial to society than harvesting and using the material for the so-called 'green transition', including biofuels, if climate targets are to be met"*⁵.

Wood burning is also the biggest source of hazardous fine particles in the EU, even above road transport. In 2018, fine particulate matter pollution was responsible for about 379,000 premature deaths in the EU-28⁶.

The EU must ensure that climate, energy and environmental policies actually work towards achieving climate and biodiversity goals, while ensuring sustainable jobs for foresters⁷. Hence, achieving the EU's renewable energy target is important. We therefore call on the EU's energy ministers to create a framework that ensures that only truly renewable energy sources such as wind, solar or geothermal are included, and rolled out at a much faster rate.

This could be done inter alia by ensuring that the 10.3bn Euros/year⁸ in public financial support currently allocated to companies burning biomass gets redirected to incentivising such activities. It seems likely that EU citizens would rather support truly renewable energy sources and increased forest protections rather than burning forests for energy, an assumption based on a petition calling out flawed biomass accounting, signed by close to 2 million people⁹.

In parallel, and this is currently also on energy ministers' tables for discussion, energy efficiency requirements, especially for the heating sector, need to be strengthened significantly. Ensuring a permanent support to more energy efficient housing advantageously would reduce overall energy demand – a much smarter approach to helping stabilise energy prices than subsidising burning forest biomass.

Below you find information about Member States' current forest management practises and how it hinders the EU's emission reduction targets and our ability to meet its biodiversity goals.

Bulgaria

³<https://www.dropbox.com/s/hdmmcnd0d1d2lg5/Scientist%20Letter%20to%20Biden%2C%20von%20der%20Leyen%2C%20Michel%2C%20Suga%20%26%20Moon%20%20Re.%20Forest%20Biomass%20%28February%2011%2C%202021%29.pdf?dl=0>

⁴ https://www.fern.org/fileadmin/uploads/fern/Documents/2021/2021_bioenergy_facts_sheet.pdf

⁵ <https://www.konj.se/publikationer/miljoekonomisk-rapport/miljoekonomisk-rapport/2021-12-15-svensk-skog-behover-en-starkare-klimatpolitik.html>

⁶ https://secure.avaaz.org/campaign/en/climate_action_now_loc/

⁷ <https://www.fern.org/story-articles/europe%E2%80%99s-rich-and-threatened-forest-biodiversity/>

⁸ https://ec.europa.eu/info/sites/default/files/amendment-renewable-energy-directive-2030-climate-target-with-annexes_en.pdf

⁹ https://secure.avaaz.org/campaign/en/climate_action_now_loc/

Over 60% of logging in Bulgaria is done for combustion, according to the data of the State Forestry Agency. 1 million cubic metres of timber are used for furniture and boards, another 1 million goes for pellets, and 4-5 millions cubic metres of timber are used as firewood. Official transportation tickets of the logging companies are even currently showing that timber is transported to old coal power plants which are linked to shady oligarchs. These operators seem to under-declare their CO₂ emissions.¹⁰ Any new subsidies for burning wood could significantly increase the consumption of wood for energy and destroy the existing fragile balance of economic, social and ecological requirements. Currently, the balance is partially maintained in spite of the numerous conflicts between different uses. If biomass subsidies are allowed, a serious public conflict among the various stakeholders will surge.

At the same time, Bulgaria is being sued for the second time by the European Commission for not meeting air quality limit values for PM₁₀ and is facing financial penalties. Official data by the Bulgarian Executive Environmental Agency show that solid fuel (mostly timber) used for domestic heating is the major source of PM_{2.5} and PM₁₀ in the problematic regions. The previous case finished with a ruling against Bulgaria in 2017, however timber with a high level of moisture is still the main source of solid fuel in domestic heating in the country. The failure of the government to properly regulate the firewood usage and quality as well as combustion of timber in coal plants leads to a lack of adequate measures to improve air quality - resulting in a new European Court case launched in 2020. The consumption of wood for energy should be decreased and not supported.

Estonia

Estonia is currently using around 6 million cubic metres of wood for its energy needs and exporting nearly an additional 3 million cubic metres in form of wood pellets to other EU members for energy use. Unprecedented clear-cutting intensity is endangering species and habitats and is even affecting protected areas: 5700 hectares of Woodland Key Habitats have been logged on state forest land between 2008-2018; 60000 hectares worth of logging permits with no impact assessment have been issued in Natura 2000 network areas that are supposedly designated to protect forest habitats of European importance. The European Commission has started an infringement procedure against Estonia on logging in the Natura 2000 network.

Finland

Finnish forestry is a huge cause of biodiversity loss in terms of both species and habitats¹¹ and the industry is responsible for causing large GHG emissions¹². More than a quarter of all energy consumed in Finland consists of bioenergy generated from climate damaging wood-based fuels (2020 figures)¹³. In Inari, Finland, 300-year-old round wood is being burnt in district heating plants and the harvesting and burning of forest hurts the livelihoods of the Indigenous Sámi People¹⁴. Also, the burning of forest industry by-products, logging residues and wood residues has increased over the past 40 years¹⁵ all these different kinds of forest biomass comes from an intensive forestry model in a country where roughly 6% of forests are protected¹⁶, the pace of felling in recent years means that about one percent of the country's most valuable biodiverse forests disappear each year¹⁷, with 58% of this wood being burned for energy¹⁸.

Hungary

The Hungarian Constitutional Court in its June 15 2020 ruling annulled many of the 2017 amendments of

¹⁰ <https://www.occrp.org/en/investigations/bulgarian-coal-magnates-plants-may-have-saved-around-30m-euros-by-under-declaring-emissions>

¹¹ <https://www.luke.fi/en/natural-resources/forest/forest-biodiversity/>

¹² <https://www.fern.org/publications-insight/finlands-forestry-myth-undermines-its-radical-climate-ambition-1990/>

¹³ https://stat.luke.fi/sites/default/files/suomen_metsatilastot_2021_verkko.pdf

¹⁴ https://www.fern.org/fileadmin/uploads/fern/Documents/2021/Unsustainable_and_ineffective_EU_Forest_Bio_mass_Standards.pdf

¹⁵ <https://stat.luke.fi/en/wood-consumption>

¹⁶ <https://www.greenpeace.org/finland/blogit/7321/viisi-faktaa-suomen-metsien-suojelusta/>

¹⁷ <https://yle.fi/uutiset/3-12208625>

¹⁸ <https://www.luke.fi/uutinen/suurin-osa-puusta-paatyy-lopulta-energiaksi/>

the country's Forest Law on the grounds that they violated the Constitution. One of the court's arguments was that clear-cutting causes extremely severe and irreversible damage to the ecosystem in protected areas, which clashes with basic rights and constitutional values. However, due to the new subsidy system available for renewable energy (METAR), the pressure on forests is increasing as a source of fuel. on primary woody biomass to be burned. This pressure will likely increase the area of clearcuts. "We are really worried about the likely tendency of increasing primary forest biomass burning as an unjustified renewable energy source, because our forests in Hungary are not in a good condition. The EEA State of Nature in the EU report reported relatively high bad conservation status in the Pannonian ecoregion. Pressure from the bioenergy sector will likely worsen the situation," said Zoltan Kun, Secretary, Friends of Fertő Lake Association

Latvia

With fuelwood exports (incl. wood pellets) reaching record levels (4547.1 thousand tonnes in 2020), the logging volume has reached the highest level in the 21st century. In more than 80% of cases final felling is done by clear-cutting. The harvesting levels are clearly beyond any conception of "sustainable" as old-growth forests, forest habitats of EU importance and breeding sites of rare and threatened species are being logged. The increase of logging volume has also been identified as the main driver for the dramatic reduction in carbon sequestration rate in forests of Latvia. Though there are several drivers for the increase in logging volume, the rise in demand for biomass for energy production is undoubtedly an important one.

Lithuania

Lithuania's use of woody biomass for energy became a significant factor over the years due to the transformation of municipal heating facilities that have transitioned to burning biomass. By qualifying woody biomass as renewable energy and promoting it over other energy sources, we are not only burning our climate, but also slowing down solutions to the energy efficiency problems of Soviet blockhouses, which are an important underlying problem, causing significant emissions and discomfort for citizens. In the current reality, it is not possible to track the source of woody biomass used for energy production. A transparent system tracing the real source of energy is lacking. But it should become a new and uncompromised standard of the green transition policy. The Lithuanian public is deeply concerned about the use of forests and clearly expresses the need to strengthen their protection for our climate and biodiversity. Citizens at the same time clearly state the necessity to promote non-wood forest products and services and to reduce logging.

Poland

In Poland the annual consumption of woody biomass for energy production increased by almost 10 million m³ (70%) per year over the last 15 years. This is due mainly to the expansion of the bioenergy sector in which the consumption of woody biomass has grown 140 times since 2004 reaching 5 mln m³/year in 2019. Further growth is expected in the next 10 years, with solid biomass extraction from domestic resources (of which 80% is woody biomass), projected to be 56% higher in 2030 than in 2015. This will not be possible without further intensification of forest management, which already now, according to the European Environmental Agency, is the main threat to the protected forest habitats in Poland.

Slovenia

Slovenia's forests cover around 58% of it's surface. The effects of climate change are having a major impact on forests. Sinks declined after 2014 when forests were severely affected by natural disasters. The state of forests has been improving and the amount of carbon sequestered has been on the rise since 2017, with damaged areas recovering from storms through rehabilitation and natural regeneration. In 2020, 4,227,474 m³ of wood mass was harvested. For energy purposes around 2 million tonnes of wood are used every year. One quarter of the Slovenian population is heated with wood biomass. The only big energy installation that has a permit for burning biomass is Te-Tol (Ljubljana's Power Station heat and power station) with an average consumption of 105,000 tonnes of wood chips, from which around 15% of the CHP unit's heat and electricity is produced. This amount should not be increased to

ensure the continued health of forests - as carbon sinks as well as repositories of biodiversity. Slovenia has a long tradition of managing its forests sustainably and we believe that if the pressures for biomass burning grow, this may be under threat in the future.

Sweden

In Sweden the Swedish forest industry emits *more* carbon dioxide, than all other industries, including traffic, emits *combined*¹⁹. Also, about 39% of the sensitive biologically-important habitats in Sweden were negatively affected by harvesting during 2014-2017²⁰. According to official reporting under the EU Habitats Directive, 14 of 15 forest biotopes in Sweden²¹ do not have a favourable conservation status, and the Swedish Forest Agency's annual review of the environmental quality objective²² shows a negative trend for forests. The existing sustainability criteria in the REDII are not strong enough to prevent further logging of Sweden's last remaining natural forests. Today a majority of the planted trees in Sweden are young and not ready to be harvested²³. Therefore, the remaining unprotected high conservation value forests are being logged. The climate- and ecologically-destructive clearcutting model is the main harvesting method used²⁴. The method that is called the 'Sustainable Forestry Model' (SFM) by the industry. Furthermore, it is often dead wood and deciduous trees vital for biological diversity that are used in heating plants²⁵. None of this is prevented by either the current or the proposed REDII sustainability criteria.

For EU policy to be paying to log and burn forest biomass for energy is deeply, profoundly counterproductive. We therefore ask that forest biomass must be excluded from the renewable energy directive. It's time to put forests, climate, and people first.

Thank you for your attention,

Dr. Vera Staevska, Society for Investigation Practices, Green Law Initiative, **Bulgaria**
Andrey Ralev, Balkani Wildlife Society, **Bulgaria**
Ivaylo Hlebarov, Environmental Association Za Zemiata / FoE Bulgaria, **Bulgaria**
Siim Kuresoo, Estonian Fund for Nature, **Estonia**
Liina Steinberg, Save Estonia's Forests, **Estonia**
Sommer Ackerman, Finnish Nature League, **Finland**
Zoltan Kun, Friends of Fertö Lake Association, **Hungary**
Dr. Viesturs Kerus, Latvian Ornithological Society, **Latvia**
Žymantas Morkvénas, Baltic environmental forum, **Lithuania**
Augustyn Mikos, Association Workshop for all Beings, **Poland**
Nina Tome, Focus Association for Sustainable Development, **Slovenia**
Lina Burnelius, Protect The Forest, **Sweden**

¹⁹ <https://www.svt.se/nyheter/vetenskap/skogsindustrin-varsta-utslapparen>

²⁰ https://www.fern.org/fileadmin/uploads/fern/Documents/2021/forest_strategy_letter_EN.pdf

²¹ <https://www.naturvardsverket.se/Documents/publ-filer/6900/978-91-620-6914-8.pdf?pid=27007>

²² <https://www.skogsstyrelsen.se/nyhetslista/negativ-trend-for-miljotillstandet-i-skogen/>

²³ https://skogsstatistik.slu.se/pxweb/sv/OffStat/OffStat_Skogsmark_Areal/SM_Areal_alderklasser_tab.px/

²⁴ <https://www.skogsstyrelsen.se/statistik/statistik-efter-amne/avverkningsanmalningar/>

²⁵ <https://www.gu.se/sites/default/files/2020-11/Nyhetsbrev9.pdf>