

Dear MEPs,

We would not like to leave a letter from the World Bioenergy Association without comment when it has reached so many of you. Many statements in the letter are incorrect or used in a misleading way. We ask that you consider our critique as you make your decision on biomass policy reforms in RED III.

Respectfully, the Forest Defenders Alliance

Manfred Weber MEP, President of the European Peoples Party (EPP)
Iratxe García Pérez MEP, President of the Socialists and Democrats (S&D)
Stéphane Séjourné MEP, President of Renew Europe
Ska Keller MEP and Philippe Lamberts MEP, Co-Presidents of the Greens
Marco Zanni MEP, President of the Identity and Democracy Group (ID)
Raffaele Fitto MEP and Ryszard Legutko MEP, Co-Chairmen of the European Conservatives and Reformists (ECR)
Manon Aubry MEP and Martin Schirdewan MEP, Co-Presidents of the Left in the European Parliament – GUE/NGL



29 August 2022

Re: Considerations for the revision of the Renewable Energy Directive (RED III)

Dear European Parliament Leaders,

I write to you in your capacity as leaders of the European Parliament's political groups, ahead of the upcoming Plenary debate to decide the Parliament's position on the revision of the Renewable Energy Directive (RED III).

The World Bioenergy Association (WBA) has **organized a meeting** of unaligned, world-leading experts to discuss proposals made by the Parliament in recent months with regards to RED III and possible implications thereof. The group of experts comes from diverse backgrounds including the representation of over 16 million forest owners, bioenergy data analysis, IPCC contributors to climate science and international energy policymaking. The event will take place in the **Euractiv offices at 12.30pm in Brussels on 7 September 2022, and will also be streamed live through the following link.**

Misleading. Climate mitigation requires reducing emissions and storing more carbon. The EC's own scientists say logging and burning forest biomass *increases* emissions compared to fossil fuels, and degrades forest carbon storage.

The meeting has been organized in light of the Parliament's proposed definition of 'primary woody biomass' and the removal thereof from the scope of renewable energy targets. While we recognize the good intentions of the Parliament's policymakers, we are worried that this amendment will prove to be counterproductive if not deleterious for **climate protection, maintenance of healthy forests and European energy security.**

Misleading. The 2021 JRC biomass report found removing and burning "coarse woody debris," which includes logging residues, is **"high risk" to ecosystems, biodiversity, and climate.** <https://bit.ly/3TsjqgO>

Misleading. No one is proposing a ban on wood-burning. The reform would stop energy from burning trees from counting toward RE targets.

Further, to replace just 10% of Russian fossil fuels with wood would require increasing wood-burning by 60%. Any such increase in logging would fatally undermine EU's legislated goals to restore nature and reduce emissions. <https://bit.ly/3KwKsQh>

The meeting will therefore hear our views, as well as those from some of the world's leading bioeconomy/bioenergy experts on the revision of the Directive and possible implications it could have. Recognizing the limited time which is available to key decision makers in the Parliament to decide on what ought to be included in the final text of the revised Directive, the WBA would like to offer our views, **which will be stress tested by the assembled experts on 7 September:**

Misleading. In fact there's increasing evidence to suggest that the EU is harvesting more wood than it's growing. This is certainly the case in some member states where there is total loss of the carbon sink.

- 1) European Forests Continue to Grow:** There is solid scientific evidence, that the amount of harvested wood is well below the amount of wood that is regrowing in all regions of Europe. According to Forest Europe the growing stock of wood in Europe has increased on average by over 350 Million m3 per year between 1990 and 2020. Also, the area of forested land has steadily increased in Europe and is currently 10% larger than 30 years ago. Thus, it is a fact that wood is a renewable resource in Europe

This isn't the whole story. The EU's forest carbon sink is decreasing... each year, forests store less carbon. Some member states have lost their carbon sinks entirely, like Finland and Estonia. <https://bit.ly/3KAKLtl>

Forests are expanding due to establishment of plantations, which are not a substitute for natural forests. They have 1 - 3 tree species and almost none of the diversity and functions of a natural forest.

Misleading, irrelevant. Whether or not it's true that growth exceeds harvesting in the EU, this is irrelevant to the climate impacts of burning forest biomass for energy. As the EC's own 2016 impact assessment for biomass concluded, "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." <https://bit.ly/3Rlcyjr>

Misleading. Trees are not "immediately replaced" - that's not possible. Regrowing them takes years to decades to centuries. Just because the EU's forests as a whole grow more wood each year than is harvested does not mean that emissions from burning wood are instantaneously offset, though that's what would need to happen for biomass to be "carbon neutral." In fact the emissions from logging forests are recorded in the land sector, and it's now apparent that over-harvesting is one reason why the EU's forests and land sector takes up less carbon each year. Claiming that forest growth in one place constantly and immediately offsets emissions from logging and burning wood somewhere else is an accounting trick that would not be tolerated in the world of business or banking.

as the volume of trees we are harvesting is constantly and immediately replaced by the growth of standing trees.

Here's what the IPCC says about "sustainable" biomass and climate: "The IPCC Guidelines do not automatically consider or assume biomass used for energy as 'carbon neutral', even in cases where the biomass is thought to be produced sustainably." (<https://www.ipcc-nggip.iges.or.jp/faq/faq.html>, Q2-10) Elsewhere the IPCC obviously acknowledges that logging and burning wood adds to atmospheric CO2.

2) **Climate Change Mitigation:** The IPCC has clearly stated, that using biomass from sustainable forestry is an important contribution to climate protection. There is no scientific evidence that using sustainably produced biomass is worse than using fossil fuels as is sometimes claimed. The contrary is the case and RED II requires, that all new bioenergy plants must demonstrate 80% GHG savings. Moreover, the use of bioenergy in combination with carbon capture and sequestration is currently the only readily available technology to remove CO2 from the atmosphere – a technology we will urgently need if we are to come even close to achieving our climate goals.

The "80% reduction" claim is misleading because the calculation does not include any CO2 from actually burning the biomass, meaning it counts as "zero" smokestack emissions that are actually greater than coal.

3) **Forest Maintenance:** Climate change is already impacting European forests heavily. In order to maintain healthy forests for the future there is an urgent need to replace certain predominant species such as spruce with more drought resistant trees and to increase biodiversity in forests. This creates the need for increased harvesting to allow the transformation of existing forests into a more resilient status. Decreased harvesting and a lack of removal of harvesting residues would result in devastating pest events and increase the threat of severe forest fires.

These claims about fire risk are misleading. International research shows that natural, shaded, intact forests are the most fire-resistant. Meanwhile, it's climate change, drought and the flammability of plantations that's driving the EU's fire outbreak, not the relative abundance of residues.

This doesn't follow. Nothing about the goal of re-naturalizing forests requires "increased" harvesting, esp. given the EU's goal of storing more carbon in the land sector by 2030, which will require decreased harvesting.

4) **Energy Security:** The role of primary biomass for European energy supply is substantial: 20% of renewable energy supply for Europe is provided from primary biomass. This is equivalent to all energy produced by windmills and photovoltaic systems in Europe combined. Excluding primary biomass from being used in the current situation of energy crisis in Europe, will make achieving our renewable energy targets impossible and would accelerate the current move back to heavily polluting fuels such as coal.

Alarmist and misleading. Again, the proposal to stop counting forest biomass toward RE targets will not "exclude" use of wood or prohibit wood-burning in any way.

Wood-burning is the biggest source of particulate pollution in the EU, emitting c. five times as much particulate matter as the transport sector. Air pollution kills more than 1,000 EU citizens per day prematurely (<https://bit.ly/3B1f9tQ>). Wood-burning power plants emit as much or more PM as coal plants, per MWh. No one wants to go back to coal - but it's misleading to imply that wood-burning is "clean."

In summary the WBA believes that defining *primary woody biomass* from forests as outside the scope of the Renewable Energy Directive, while well intentioned, will affect forest maintenance, jeopardize European efforts to reduce greenhouse gas emissions and seriously affect European domestic energy supply and energy security.

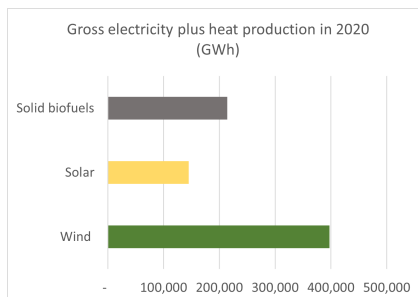
Physics dictates that burning wood emits more CO2 than coal per unit energy produced, and emits it instantaneously, while it takes decades to centuries for forest regrowth to offset those emissions. The carbon math thus demonstrates that burning forest wood does not "reduce" GHG emissions in a timely way. This will be further discussed with assembled experts in Brussels on 7 September at 12.30pm, and we hope that you and your group colleagues will join us then for further discussion on these important topics.

To reverse the trend of carbon loss in the EU's existing forests and meet even the weak land sector carbon targets, the EU must increase the carbon stored in forests. The EU should protect and restore forests, not burn them for fuel.

With best regards,

Christian Rakos

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Wind and solar together produce far more energy than solid biofuels. Data from Eurostat, "Production of electricity and derived heat by type of fuel [nrq_bal_peh]"

False and misleading. In fact there are numerous peer-reviewed studies, some by the EC's own scientists, essentially stating the same thing as the IPCC - that "sustainability" is basically irrelevant to the climate impact of burning wood. See <https://bit.ly/3R1cyjr> for EC impact assessment, <https://bit.ly/3cxv9KG> for 2021 JRC report, and <https://bit.ly/3AAVhMG> for online model.

False. Biomass with carbon capture and storage (BECCS) is not "readily available." Even if it were, as the IPCC states (page 763, <https://bit.ly/3Trb74Z>) "The concept of BECCS rests on the premise that bioenergy production is carbon neutral... wood-based BECCS may not be carbon negative in the first decades, initially emitting more CO2 than sequestering."

Renaturalizing forests is a good idea, but why not do it gradually as each plantation is harvested? It will be hard enough to do this without accelerating harvesting.

While yes, forest biomass provides about 20% of the EU's renewable energy on an energy input basis (meaning the energy inherent in the fuel) in terms of energy output (energy "produced"), it's not correct to claim it beats out "all energy produced from windmills and photovoltaic combined." Burning biomass is extremely inefficient so it takes a disproportionate amount of energy input to generate "useful" energy output. Thus together, wind and solar produced over 542 GWh of energy in 2020, 250% the energy from all solid biomass burned for energy - not just forest biomass. See the graphic at the bottom of the page.

Further, the fact that 20% of renewable energy input comes from forest biomass is actually good news, because the much lower amount of energy produced on an output basis can be relatively easily replaced with truly clean actual generation, incl. helping people out of the energy poverty trap that the EU's biomass policy creates by continuing to subsidize bioenergy instead of heat pumps and solar. <https://bit.ly/3CJdxGq>



To further support our comments, we summarize below a few basic facts about forest biomass:

- Total subsidies for bioenergy are around €17 billion per year.
- Burning wood emits more CO₂ than burning coal, per unit energy produced. See explanation here: <https://bit.ly/3Q1GqAu>
- The JRC (<https://bit.ly/3TsjqgO>) assessed that burning all biomass – both primary woody biomass (PWB, sourced directly from forests) and secondary woody biomass (mill residues and post-consumer wood) emits upwards of 380 million tonnes of CO₂ per year as of 2016. It's more now.
- “Net” CO₂ emissions can exceed those from fossil fuels for an extremely long time. The EC’s own 2016 impact assessment for the RED explained the 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 impact assessment also concluded that *“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.”* <https://bit.ly/3Rlcyjr>

- The biomass industry isn’t just using “residues”. There’s ample photographic evidence and industry data that they’re logging and burning stemwood for energy. See for example <https://bit.ly/3AAhMkH>
- Logging forests for fuel is leading to an alarming degradation of the forest carbon sink in the EU. In some countries like Finland and Estonia, it’s essentially gone, and it’s clear that biomass logging is greatly responsible. See the data here: <https://bit.ly/3Rg50ig>

Thank you for your interest in this extremely important topic. We hope that you’ll support a taking primary woody biomass out of the RED, retaining a science-based definition of PWB, and creating a strong framework for the cascading principle to ensure that wood from the EU’s precious forests is used efficiently. The future of the EU’s forests and climate depends on you.

In hope,

The Forest Defenders Alliance