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Joint Forest owners and managers' considerations on the Renewable Energy Directive RED III

European forests and the forest-based sector play a key role in achieving the EU climate neutrality target by contributing to renewable energy supply while keeping forests healthy due to active and sustainable forest management. **Except forests are NOT healthy. They're in real trouble**

This is why the European forest owners and managers would like to share their key concerns ahead of the trilogue discussions on Thursday 15 December on the renewable energy directive (REDIII).

Primary biomass is a by-product from sustainable forest management

The final position of the European Parliament, which would limit the use of primary biomass is in a strong contradiction with providing contribution of forest management to climate neutrality objectives of the EU Green Deal.

Primary biomass is a concept which embraces the entire forest biomass removal during a forest life cycle, either in result of tending or harvest operations which are needed for delivering high-quality timber. Primary biomass can be either low or medium quality wood that originates e.g. from tending of forest stands, cleaning, thinning, salvage logging, or high value-added material from final felling. These various qualities have different end uses. Low quality biomass often has no other end-use than energy, while high and medium quality biomass is used for purposes like construction, packaging, paper and multiple other innovative wood-based products. **whatever the rationale for burning it, it's not carbon neutral and in fact increases emissions compare to fossil fuels. Anyway, they can still burn it - it just should not be counted toward renewable energy targets. This is all about the subsidies... they want those billions of euro that EU citizens shell out each year!**

Therefore, the concept of primary biomass and its limitation for bioenergy use as proposed by the European Parliament is conceptually wrong. Moreover, the market ensures that high quality timber is used for high-value added products making sure that forests in Europe are managed and grown for multiple purposes.

Parliament's position brings uncertainties for forest sector and for forest owners and managers

The European Parliament's position would create huge uncertainties on the future of the bioenergy and forest-based sector during a period where the EU is struggling to get rid of fossil-dependency and as the global energy crisis is accelerating. According to multiple scenarios, bioenergy will be an important player to decarbonise our society. If biomass

False! Burning wood does not "decarbonize" anything!

Talk to the wood product producers - they are begging policymakers to stop promoting burning forest biomass for energy. They're clear that correct application of the cascading principle means only truly end-of-life secondary biomass should be burned for energy - <https://forestdefenders.eu/wood-product-manufacturers-speak-out-against-burning-wood-for-energy/>

originating from forest industry processes (secondary biomass) would be the only wood-based biomass eligible for support, this could distort the market leading to price volatility and bring ramifications across the entire value chain. In addition, it could have negative consequences for the further development of the wood-based bioeconomy which is key to support the transition from fossils to bio-based products and fuels.

The positions of the European Parliament also send a very negative signal to forest owners and managers. Ultimately, the restrictions on the use of forest-based energy could prevent forest owners and managers from investing in forest tending operations to keep forests in a good shape and health, whilst gaining a certain revenue from low quality wood which is essential for a long-term management and profitability of forest holdings would not be possible. It could also pose forests in a high risk in terms of natural disturbances if forest owners are encouraged to leave more woody material in their forests.

Consider a balanced sustainable forest management criteria

In addition to the primary biomass definition, the new entries on biodiversity and soil quality part of the sustainable forest management criteria proposed by Commission and strengthened by the Parliament could be challenging for forest owners and managers to comply with. This could lead in legal uncertainty, higher bureaucracy and decrease the profitability of forest holdings, and thus risk the availability of woody biomass for energy which would be in a strong contradiction with EU's ambitious climate goals aiming to increase the share of renewable energy. *With the EU's forest carbon sink collapsing, and biodiversity crashing, who still believes that forest owners are, as a whole, doing a good job taking care of the EU's forests? the proof is right in front of everyone.*

For example, on "no-go areas" proposed by the Parliament, the definition of old-growth forests is still not yet agreed upon on an EU level, which means that high uncertainty remains which forests would be classified as old-growth forests. Similar uncertainties also apply to the definition of highly biodiverse forests.

In a context of different management practises, the sustainability criteria should consider sustainable forest management as a holistic concept which requires flexibility for forest management practices on a local and regional level and mirror the variety of different forest habitats. Therefore, European forest owners and managers cannot support to introduce any limitations to certain management practices part of the sustainable forest management criteria. *And there you have it. No limitations. They consider the forests are "theirs" to continue trashing - even though the EU is going to completely miss its climate and nature restoration targets if business-as-usual continues.*

Signatories:

CEPF – Confederation of European Forest Owners

Copa-Cogeca – European Farmers and Agri-Cooperatives

EUSTAFOR – European State Forest Association

ELO – European Landowners' Organization

FECOF - European Federation of Forest-Owning Communities

USSE – Union of Foresters of Southern Europe