



14 May 2020

To: Executive Vice-President Frans Timmermans

Cc: Commissioners Virginijus Sinkevičius, Kadri Simson and Janusz Wojciechowski

Subject: Reviewing the EU's bioenergy policies

Dear Executive Vice President

At the climate summit in Madrid last December you acknowledged that the science on the bioenergy issue had evolved significantly over the preceding couple of years and said that the EU needed to look at this closely, and use the latest scientific evidence to make sure that its policies in this area did not do more harm than good.¹

We are very concerned that at present, more harm than good is precisely what is happening. The ever increasing extraction and use of biomass for energy, and the dedicated use of land for biofuel or energy crops, runs directly counter to the EU's climate objectives, and to its aim of protecting and restoring biodiverse ecosystems.

And there is now compelling and authoritative scientific opinion that the revised Renewable Energy Directive (RED) and the revised Land Use, Land Use Change and Forestry (LULUCF) Regulation will continue to incentivise types of bioenergy that *increase emissions compared to fossil fuels* – in many cases dramatically. Specifically:

- The 2018 letter² highlighting the threat to climate and forests from the EU RED that was signed by nearly 800 scientists, including multiple IPCC lead authors and winners of the Nobel Prize and US Medal of Science;
- The subsequent letter³ signed by a subset of the principal signatories, which explained why the EU's LULUCF Regulation – though in many other respects admirable – does not solve the bioenergy problem created by the RED;

- A review⁴ based on work by Europe's Academies of Science that found that bioenergy is having the opposite effect to that expected of renewable energy, by increasing atmospheric levels of carbon dioxide for substantial periods of time;
- The 2018 report⁵ from the research arm of the UK Government's Forestry Commission, the agency that the European Commission's Directorate General for Energy commissioned to support its work developing the revised RED, which concludes that the revised RED contains few of the sustainability criteria required to ensure that biomass delivers carbon benefits compared to fossil fuels and recommends that Member States introduce stricter rules at national level; and
- The taxonomy report by the EU Technical Expert Group on sustainable finance published in March⁶, which concluded that the bioenergy criteria in the RED were not sufficient for bioenergy to qualify as a green investment and instead that a feedstock-based approach was required.

As things stand, the bioenergy criteria in the RED are due to remain unchanged for another decade. In that time – precisely the timeframe over which we face a make or break challenge on climate – immense further harm could be done to the world's climate and to forests and other ecosystems as a result of EU bioenergy policies, not least because other countries around the world are copying the EU's example and relying on the EU RED as a model.

We therefore urge you, as the Commission considers how to amend legislation in light of new climate and biodiversity goals, to carry out a root and branch review of the sustainability criteria in the RED for all forms of bioenergy, with the full involvement of climate and environmental scientists.

Having for many years led the rest of the world down the wrong path on bioenergy, and done serious damage to the climate and to ecosystems in the process, the EU now has a moral duty to mend its ways, and institute a policy based on the science rather than the interests of the bioenergy lobby.

Yours sincerely,

Ester Asin, Director, WWF European Policy Office

On behalf of:

WWF
 Greenpeace
 Transport & Environment
 Birdlife
 Fern
 Wetlands International
 Milieudefensie
 Leefmilieu
 Natuur & Milieu
 Werkgroep Bomen Groningen
 ZERO - Association for the Sustainability of the Earth System (Portugal)
 Estonian Fund for Nature
 ARA
 Dogwood Alliance
 Australian Forest & Climate Alliance
 Climate Change Australia-Hastings
 Federation Against Biomassplants

Gippsland Environment Group
Environment East Gippsland inc
No Electricity From Forests
North East Forest Alliance

¹ <https://news.mongabay.com/2019/12/cop25-eu-officials-say-biomass-burning-policy-to-come-under-critical-review/>

²

https://www.dropbox.com/sh/sqhn0b4h6dwvq65/AADnK8Q18AAFaCeWvbZ40vFGa?dl=0&preview=UPDATE+800+signatures_Scientist+Letter+on+EU+Forest+Biomass.pdf

³

https://www.dropbox.com/sh/sqhn0b4h6dwvq65/AADnK8Q18AAFaCeWvbZ40vFGa?dl=0&preview=Scientists+letter+to+lead+European+Parliament+negotiators+regarding+biomass+rules+in+renewable+energy+directive_June+2018.pdf

⁴ <https://onlinelibrary.wiley.com/doi/pdf/10.1111/gcbb.12643>

⁵ <https://www.dropbox.com/sh/sqhn0b4h6dwvq65/AADnK8Q18AAFaCeWvbZ40vFGa?dl=0&preview=CIB-Summary-report.pdf>

⁶ https://ec.europa.eu/info/sites/info/files/business_economy_euro/banking_and_finance/documents/200309-sustainable-finance-teg-final-report-taxonomy-annexes_en.pdf