



May 15, 2020

Mr. Frans Timmermans  
Executive Vice-President of the European Commission  
via email [frans-timmermans-contact@ec.europa.eu](mailto:frans-timmermans-contact@ec.europa.eu)

Dear Mr. Timmermans,

We are an international group of NGOs and scientists who understand that protecting forests is crucial to climate action. As the EU Green Deal policymaking process moves forward, we urge you in the strongest terms to support a review of bioenergy impacts on climate and environment under EU policies, including the Biodiversity Strategy. Europe must reduce the role of forest biomass in meeting the EU's renewable energy and emission reduction targets. Achieving aggressive emissions reductions is vital, but increased use of forest biomass for energy is not contributing to true emissions reductions, and is leading to more logging and degradation of forests.

Biomass already constitutes a huge portion of renewable energy inputs in the EU (Figure 1). Despite the protestations of many bioenergy proponents, an abundance of recent science demonstrates that burning forest biomass is not "carbon neutral" in any timeframe relevant for reducing emissions. Nonetheless, the RED continues to promote bioenergy aggressively, and anticipates greater use of forest biomass still.<sup>1</sup>

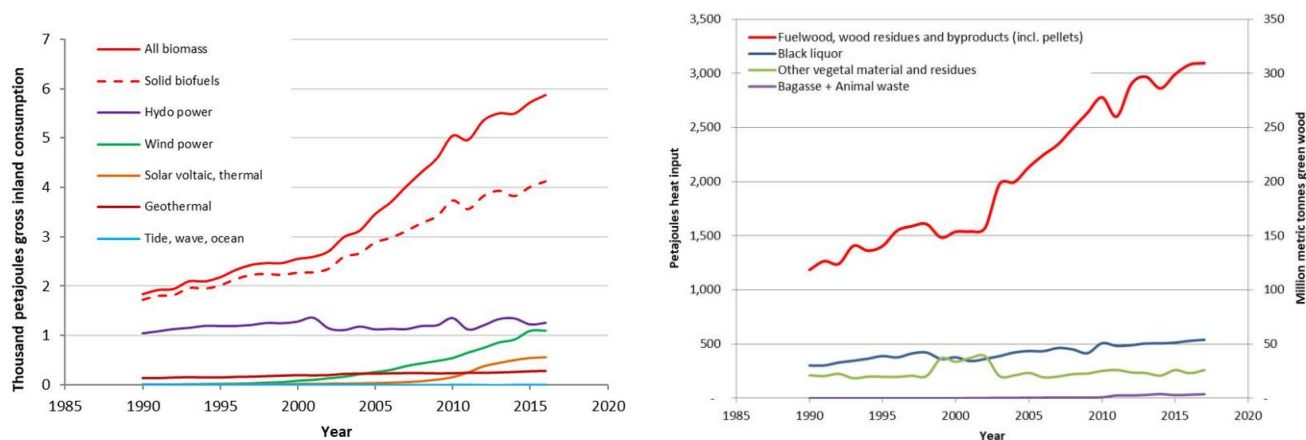


Figure 1. Eurostat data on the growth of all bioenergy and solid biofuels, and amount of solid biofuels that is comprised by wood.

Regarding impacts of bioenergy that have been brought to light in recent years, some policymakers may be soothed by the RED II's promises that "Union-wide sustainability and greenhouse gas emissions saving criteria for biomass fuels" will "continue to ensure high greenhouse gas emissions savings compared to fossil fuel alternatives, to avoid unintended sustainability impacts."<sup>2</sup>

Unfortunately, however, these are false promises for at least two major reasons.

<sup>1</sup> Recital 103: "Harvesting for energy purposes has increased and is expected to continue to grow, resulting in higher imports of raw materials from third countries as well as an increase of the production of those materials within the Union."

<sup>2</sup> Recital 101

## RED criteria are not capable of protecting forests and the climate.

We know well that the appearance of biomass “reducing” GHG emissions compared to fossil fuels depends on the RED’s GHG criteria simply not counting emissions from burning the fuel, as “emissions of CO<sub>2</sub> from fuel in use shall be taken to be zero for biomass fuels.”<sup>3</sup> Yet of course emissions from the fuel aren’t *actually* zero – the cost is acknowledged in the land sector, as carbon is sucked out of forest and sent into the atmosphere. We can see evidence of this in the co-variance of forest logging, including logging for wood fuel, and loss of the forest carbon sink in certain member states (Figure 2).

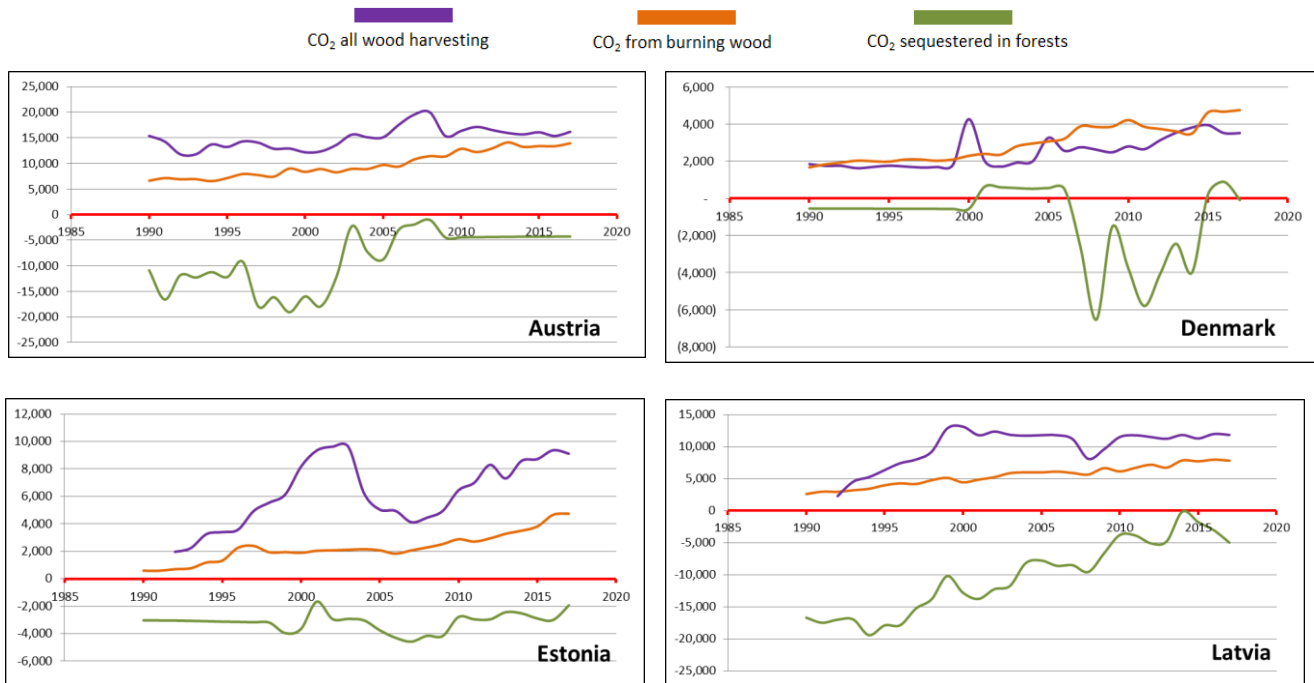


Figure 2. Co-variance of forest logging, including for biomass, and loss of the forest carbon sink. CO<sub>2</sub> equivalent of total logging, wood burned for biomass, and CO<sub>2</sub> sequestered in forests in four EU member states with robust use of wood for energy. Data on total logging from FAO; data on forest carbon sink and biomass (domestic consumption and pellet manufacture) from Eurostat.

The RED’s promise to “ensure” emission reductions implies it considers net emissions from forest biomass to actually be zero. It justifies this with the “sustainability” and “land use” criteria, weak and unenforceable provisions that make reference to forest “regeneration”<sup>4</sup> (time period not specified) and ensuring that forest cutting does not exceed growth in countries logging forests for fuel.<sup>5</sup>

However, the basic mathematics of forest and bioenergy carbon balance really is this simple: trees burn faster than they regrow. Accordingly, the IPCC has made it clear: “If bioenergy production is to generate a net reduction in emissions, it must do so by offsetting those emissions through increased net carbon uptake of biota and soils.”<sup>6</sup> As the European Commission’s *own* science staff have noted, the fact that

<sup>3</sup> Annex VI.B.13

<sup>4</sup> Recital 102; Article 29.6(a)(ii)

<sup>5</sup> Article 29.7(a)(iii); Article 29.7(b)

<sup>6</sup> IPCC AR5 WG III 11.13.4 GHG emission estimates of bioenergy production systems, 2014 (page 877 at [https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc\\_wg3\\_ar5\\_full.pdf](https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_full.pdf))

there is some net forest growth does not translate to “carbon neutrality” of biomass, and “sustainability” criteria such as those included in the RED II are “not sufficient to ensure climate change mitigation.”<sup>7</sup> However, despite this damning conclusion, the RED’s weak sustainability and land use provisions are the sole basis of the claimed carbon “reductions” in the RED.

Additionally, there is nothing in the RED that protects any particular forest from being harvested, even the most carbon rich and biodiverse, and there is no prohibition on the most damaging forestry practices. This means we will continue to see egregious forest exploitation by the biomass and wood pellet industry including logging in wetland hardwood forests of the US Southeast,<sup>8</sup> clearcutting of boreal forests in Estonia,<sup>9</sup> illegal logging in Romania’s Carpathian Mountains to make pellets for residential heating,<sup>10</sup> and recently, logging old-growth in British Columbia’s inland rainforest<sup>11</sup> (Figure 2). The RED’s “sustainability” criteria do not require even minimum protections, let alone mandating sustainable forestry practices like retaining forestry residues to protect soil nutrient status, which a major survey identified as at risk from biomass harvesting.<sup>12</sup>



Figure 3. Old growth cedar logs arriving at the Pacific Bioenergy pellet plant in Prince George, British Columbia. Photo James Steidle for Conservation North.

<sup>7</sup> Commission Staff Working Document Impact Assessment: Sustainability of Bioenergy. 2016. European Commission. 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)

<sup>8</sup> Dogwood Alliance, Natural Resources Defense Council, and Southern Environmental Law Center. 2019 Global Markets for Biomass Energy are Devastating U.S. Forests. At <https://www.nrdc.org/sites/default/files/global-markets-biomass-energy-06172019.pdf>

<sup>9</sup> Danish TV2. 9 Sept 2019. Når Danmark brænder træer af, bliver der ikke altid plantet nye (“When Denmark burns trees, new ones are not always planted”). At [https://nyheder.tv2.dk/2019-09-09-naar-danmark-braender-traeer-af-bliver-der-ikke-altid-plantet-nye?fbclid=IwAR1gVollhHjTbIMA1Hr\\_C\\_I8j7RN4y07Itr2d-OQjGP5cYhv-XAyRzp1\\_Uc](https://nyheder.tv2.dk/2019-09-09-naar-danmark-braender-traeer-af-bliver-der-ikke-altid-plantet-nye?fbclid=IwAR1gVollhHjTbIMA1Hr_C_I8j7RN4y07Itr2d-OQjGP5cYhv-XAyRzp1_Uc)

<sup>10</sup> Environmental Investigation Agency. 2015. Stealing the Last Forest. At [https://s3.amazonaws.com/environmental-investigation-agency/assets/2015/10/Stealing\\_the\\_Last\\_Forest/EIA\\_2015\\_Report\\_Stealing\\_the\\_Last\\_Forest.pdf](https://s3.amazonaws.com/environmental-investigation-agency/assets/2015/10/Stealing_the_Last_Forest/EIA_2015_Report_Stealing_the_Last_Forest.pdf)

<sup>11</sup> Canada’s National Observer. B.C. says firms can chip down whole trees for pellet fuel if they are ‘inferior.’ At <https://www.nationalobserver.com/2020/04/30/news/bc-says-firms-can-chop-down-whole-trees-pellet-fuel-if-they-are-inferior>

<sup>12</sup> Achat, D. L., et al. (2015). Quantifying consequences of removing harvesting residues on forest soils and tree growth – A meta-analysis. *Forest Ecology and Management* 348(Supplement C): 124-141. At <https://www.sciencedirect.com/science/article/abs/pii/S0378112715001814>

## RED II criteria do not apply to the majority of biomass and biomass-burning facilities

Even if RED criteria were protective, they will only apply to a fraction of the more than 300 million tonnes of forest biomass that is burned in the EU each year. This is because the GHG and sustainability criteria do not appear to apply at existing facilities, and only apply to new facilities that are greater than 20 MW energy input.<sup>13</sup> Likewise, the efficiency criteria will not apply to any existing facilities and will only apply to new facilities greater than 50 MW energy input,<sup>14</sup> for which combined heat and power plants qualify, or, electricity-only plants meeting a “best available techniques” level.

Additionally, the efficiency criteria are not rigorous. For plants greater than 100 MW energy input, the efficiency requirement *drops* to a level (36%) that allows electricity-only generation but which likely relies on burning wood pellets or other dried fuels to achieve. A 100 MW plant on an energy input basis operating at 36% is theoretically a 36 MW plant on an energy output basis, meaning this lax efficiency requirement applies to relatively small plants.

Overall, the GHG, sustainability, and efficiency criteria will not apply at all to the overwhelming majority of biomass burning facilities in the EU – even as these facilities continue to receive subsidies under the RED II. A recent report<sup>15</sup> found that EU member states are spending more than €6 billion each year subsidising biomass burning – this being a significant underestimate because it does not include indirect subsidies as well as incentives intended to increase wood burning for heating. Accordingly, even as the EU acknowledges the need for “net zero” emissions and the urgency of restoring forests as a carbon sink, it is paying out billions to cut trees and burn them. This is counter-productive and undermines climate mitigation.

Please also remember that burning wood is a massive source of particulate matter and smog precursors, even as air pollution in the EU is killing around 500,000 people each year.<sup>16</sup> Now comes the corona virus, and evidence that associated mortality is distinctly increased by exposure to air pollution.<sup>17</sup> Citizens may well ask: Why is the EU supporting the biomass industry and residential wood-burning with financial subsidies when burning wood for energy literally kills people?

It's not often that policymakers are offered an opportunity to accomplish so much good by *stopping* doing something. Stopping subsidies for burning forest biomass would restore tens of billions of euros that could be directed to clean energy and efficiency. It would reduce forest logging and biomass burning that currently pumps hundreds of millions of tonnes of CO<sub>2</sub> into the atmosphere, thereby providing instant climate mitigation. It would reduce air pollution. It would show the EU was serious not

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<sup>13</sup> GHG criteria limits: Article 29.1(c); Article 29.10.d; Recital 104. Sustainability criteria limits: Article 29.1(c); applicability of sustainability criteria to existing facilities >=20 MW is unclear as no “starting operation by” date is specified in Article 29.6 for which facilities are covered by the criteria.

<sup>14</sup> Article 29.11 (a) - (c)

<sup>15</sup> Natural Resources Defense Council. Burnout : E.U. Clean Energy Subsidies Lead to Forest Destruction. At <https://www.nrdc.org/sites/default/files/burnout-eu-clean-energy-policies-forest-destruction-ip.pdf>

<sup>16</sup> Carvalho, H. 2019. Air pollution-related deaths in Europe - time for action. *Journal of Global Health* 9(2):020308. At <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6858990/>

<sup>17</sup> Harvard School of Public Health. May 5, 2020. Air pollution linked with higher COVID-19 death rates. At <https://www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/>

just about climate mitigation, but also about biodiversity and conservation, by dramatically reducing pressure on natural forests.

Two lessons we can all learn from the current pandemic: it *is* possible to turn policy around quickly; and, people crave nature and forests, which have been a source of solace to millions in this terrible time. The ideas of making room for nature and other species, of restoring forests, of cleaning up the air and water, of putting nature first – these delight people. In these days, shouldn't policymakers encourage delight? Imagine the surprise and then approbation of the public if policymakers prioritised growing forests, instead of burning them.

We know you understand how important this is, and we think we understand the obstacles you face. But there is only a little time left to reform the EU's bioenergy policy, and we need policy settings that respond to and directly reflect science. We are counting on your leadership to deliver a science-based renewable energy policy that recognises and reduces the impacts of biomass energy on forests, air quality, and climate. Please, we need a climate policy that puts forests first.

Sincerely,

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President  
2CELSIUS, Romania

Gabriel Paun  
President  
Agent Green, Romania

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Healthy Forest Coalition, Canada

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We attach for your reference the Biomass Delusion statement, signed by over 140 groups from the EU and the rest of the world, stating their clear opposition to burning of forest biomass as a climate solution and the associated subsidies that allow it to persist.



# ORGANIZATIONS STAND UP TO THE BIOMASS DELUSION

## *Position Statement on Forest Biomass Energy*

We share a vision of a world in which thriving natural forests play a significant role in tackling climate change and contribute to a clean, healthy, just and sustainable future for all life on earth. Burning forest wood for large-scale energy production cannot be part of that future for all of the reasons outlined below. Instead we must protect and restore natural forests, thereby reducing emissions and removing atmospheric carbon dioxide while supporting biodiversity, resilience and well-being.

### **Large-scale burning of forest biomass for energy:**

#### **Harms the climate**

**It is not low carbon** — Burning forest biomass for energy is not carbon neutral. It immediately emits large quantities of greenhouse gases into the atmosphere. In contrast it takes decades to centuries for forests to regrow and sequester the carbon, which is far too long to effectively contribute to the 1.5°C Paris Agreement target. Direct and indirect emissions from logging and the bioenergy supply chain also negatively affect its overall carbon balance. **It is encouraged by flawed accounting** — Current carbon accounting rules incentivise forest bioenergy by considering biomass combustion as a zero-emission technology, expressed as zero emissions in the energy sector. The assumption is that all emissions are instead to be accounted for when the biomass is logged, placing the burden on the forest producer rather than the biomass consumer. Yet emissions accounting of forests in the land sector is fatally flawed and generally understates emissions. The true carbon cost of biomass burning rarely appears accurately on any country's balance sheet.

#### **Harms forests**

**It threatens biodiversity and climate resilience** — Using forest biomass for energy can entrench, intensify and expand logging. This degrades forest ecosystems, depletes biodiversity and soils and harms forests' ability to deliver ecosystem services like clean drinking water, flood protection, and clean air. Conversion of forests and other ecosystems to industrial monoculture tree plantations for biomass is especially harmful. These increased impacts come at a time when we recognize that rights-based protection and ecological restoration improve the health and well-being of forests and make them more resilient to climate change and other environmental disturbances. **It undermines the climate mitigation potential of forests** — To meet the Paris Agreement goal of pursuing efforts to limit global warming to 1.5 degrees, scientists now agree we will need to draw carbon dioxide out of the atmosphere. A safe and proven way to do this is to protect and restore natural forests. Logging for biomass does the opposite.

#### **Harms people**

**It undermines community rights and interests** — Demand for biomass can exacerbate conflicts over land and forest resources, including land grabbing. This threatens rights, interests, lives, livelihoods and cultural values of indigenous and tribal peoples and local communities as well as established businesses relying on forest resources. The wide-ranging negative effects can also impact food security for the wider populace and for the long term. **It harms human health and well-being** — Forests play an important role in safeguarding communities from the worst impacts of climate change. Those living at the frontlines of forest destruction are often most vulnerable to the effects of climate change and also face oppressive extractive industries. In addition, biomass manufacturing and combustion facilities are often located in areas of socio-economic disadvantage, where they pollute the air, increasing incidents of respiratory and other diseases. Local quality of life is affected.

#### **Harms the clean energy transition**

**It provides a life-line for burning coal for energy production** — Co-firing forest biomass with coal extends the life of coal power stations at a time when we need to move beyond emissive, industrial scale burning. **It pulls investment away from other renewables** — Biomass undermines less emissive renewable energy solutions because it competes for the same government incentives. Unlike investment in low emission technologies, such as wind and solar, biomass energy entails ongoing feedstock costs and relies on continuous subsidies.

**We, the undersigned organizations believe that we must move beyond burning forest biomass to effectively address climate change. We call on governments, financiers, companies and civil society to avoid expansion of the forest biomass based energy industry and move away from its use. Subsidies for forest biomass energy must be eliminated. Protecting and restoring the world's forests is a climate change solution, burning them is not.**

Abibiman Foundation	Ghana
All India Forum of Forest Movements	India
Alliance for a Clean Environment, Western Australia	Australia
Alliance for the Wild Rockies	USA
AMAF – Benin	Benin
Amis de la Terre – Togo	Togo
ARA	Germany
Arise for Social Justice – Springfield	USA
Asia Pacific Forum on Women, Law and Development	
Australian Forest and Climate Alliance	Australia
Australian Rainforest Conservation Society	Australia
Ballina Environment Society	Australia
BankTrack	Europe
Battle Creek Alliance	USA
Bellingen Environment Centre, NSW	Australia
Biodiversity Conservation Center	Russia
Biofuelwatch	International
Birdlife	Europe
Blue Dalian	China
Bob Brown Foundation	Australia
Busselton Dunsborough Environment Centre, WA	Australia
California Chaparral Institute	USA
Canberra Forest Network, ACT	Australia
Canopee	France
Canopy	Canada
Censat Agua – Amigos de la Tierra Colombia	Colombia
Center for Biological Diversity	USA
Clarence Environment Centre, NSW	Australia
Client Earth	UK
Coffs Harbour Greens	Australia
Colectivo VientoSur	Chile
Concerned Citizens of Franklin County	USA
Conservation Congress	USA
Conservatree	USA
Czech Coalition for Rivers	Czech Republic
Defiance Canyon Raptor Rescue	USA
denkhausbremen	Germany
Doctors and Scientists against Wood Smoke Pollution	International
Dogwood Alliance	USA
Don't Waste Arizona	USA
Earth Ethics	USA

Ecology Action Centre	Canada
Econexus	UK
Endangered Species Coalition	USA
Environment East Gippsland	Australia
Estonian Forest Aid	Estonia
Extinction Rebellion Hawaii	USA
Federation of Community Forestry Users, Nepal (FECOFUN)	Nepal
FERN	Europe
Forest Media, NSW	Australia
Forest observatory	Morocco
Forests of the World	Denmark
Forum Ecologie & Papier	Germany
Forum Umwelt und Entwicklung	Germany
Fresnans against Fracking	USA
Friends of Siberian Forests	Russia
Friends of the Earth Bosnia & Herzegovina	Bosnia & Herzegovina
Friends of the Earth Finland	Finland
Friends of the Earth U.S.A.	USA
Friends of the Forest, mid South coast NSW	Australia
Friends of the Wild Swan	USA
Fund for Wild Nature	USA
Fundacja "Rozwój TAK – Odkrywki NIE	Poland
Geosphere	South-Africa
Gelderse Natuur en Milieufederatie	Netherlands
GEOS Institute	USA
Gesellschaft für ökologische Forschung e V.	Germany
Global Forest Coalition	International
Great Southern Forest, NSW	Australia
Green Longjiang	China
GreenLatinos	USA
Greenpeace International	International
Healthy Forest Coalition, Nova Scotia	Canada
Henoi	Paraguay
Humane Society International Australia	Australia
Indigenous Environmental Network	USA
Instytut Spraw Obywatelskich INSPRO	Poland
Jamesville Positive Action Committee	USA
John Muir Project	USA
Kalang Land and Environment Action Network, NSW	Australia
Kalang River Forest Alliance, NSW	Australia

Last Tree Laws	USA
Leonardo DiCaprio Foundation	USA
Les Amis de la Terre – Togo	Togo
Los Padres ForestWatch	USA
Margaret River Regional Environment Centre, WA	Australia
Massachusetts Forest Rescue	USA
Mighty Earth	USA
Milieudefensie	Netherlands
My Environment, Vic	Australia
Nambucca Valley Conservation Association, NSW	Australia
National Toxics Network, Australia	Australia
Natural Resources Defense Council	USA
Nimbin Environment Centre, NSW	Australia
NOAH (FoE Denmark)	Denmark
North Coast Environment Council, NSW	Australia
North Columbia Environmental Society	USA
North East Forest Alliance, NSW	Australia
Partnership for Policy Integrity	USA
Pivot Point	USA
Protect the Forest	Sweden
Public Lands Media	USA
Rachel Carson Council	USA
Rainforest Action Network	USA
Rainforest Information Centre	Australia
Rainforest Relief	USA
Renourish	USA
Restore: The North Woods	USA
Rettet de Regenwald	Germany
RICCE	Liberia
RootsKeeper	USA
Salva la Selva	Spain
Santa Fe Forest Coalition	USA
Save Brook Rd. Forest in WEndell State Forest	USA
Sequoia ForestKeeper	USA
Sierra Club	USA
Sierra Club BC	Canada
Snow Alliance	China
Society for Responsible Design	Australia
Soil Mates Cooperative	Canada
South East Forest Alliance	Australia
South East Forest Alliance	Australia

South East Forest Rescue	Australia
South East Region Conservation Alliance	Australia
South-West Forests Defence Foundation, WA	Australia
Southern Environmental Law Center	USA
STAND.earth	USA
Stichting Luchtfonds	Nederland
Sustainable Agriculture and Communities Alliance	Australia
Swan View Coalition, Montana	USA
Terra!	Italy
The Corner House	UK
The Development Institute	Ghana
The John Muir Project	USA
TUK Indonesia	Indonesia
Western Australian Forest Alliance	Australia
Wild Nature Institute	USA
WildWest Institute	USA
Women's Environment & Development Organization	USA – International
Womens Earth and Climate Action Network	USA & International
Woodland League	Ireland
Woods Hole Research Center	USA
Wuhu Ecology Centre	China
Yellowstone to Uintas Connection	USA
ZERO	Portugal