



Dear Member of the European Parliament,

Renewable Energy Directive (RED): Capping incentives to burn trees for energy

Debate and vote in September plenary

On behalf of the four organisations signing this letter, I am writing to remind you of our concerns about the final text of the revised RED. It fails to protect forests and the climate, and has lost almost all of the Parliament's text which would have improved the sustainability requirements for incentives for burning wood (forest biomass) for energy. We ask you to raise these points in the plenary debate on 12 September.

Burning wood remains the largest source of renewable energy that counts toward the EU's renewable energy targets. Yet burning wood emits more carbon dioxide (CO₂) per unit of energy than burning coal, and so *increases* CO₂ emissions compared to fossil fuels. More than half the wood logged in the EU is burned for energy: bioenergy is thus a major driver of the forest degradation that is eroding the EU's land carbon sink and destroying habitats.

Evidence is emerging that subsidies and incentives have significantly increased the use of woody biomass, thereby weakening forest and/or land carbon sinks. Some EU Member States, including Germany (since 2021) have now lost their entire sink. The EU's current biomass incentives are directly undermining EU climate action.

The Parliament's September 2022 plenary position, for which there was a 60% majority, was a welcome step forwards to reverse the damaging trend. It included:

- stopping the RED's incentives and subsidies for burning most forest biomass (primary woody biomass) for energy, with key exceptions;
- no longer counting CO₂ emissions from burning primary woody biomass as 'zero-carbon',
- capping the use of 'renewable' biomass energy to levels which safeguard Member States' forest carbon sink.

But the final text from the March Trilogue chaired by the Swedish Presidency rejected almost all of Parliament's proposed amendments on woody biomass. This represented a major weakening of the policy, meaning:

- billions in public funds can still be paid to biomass operators for burning most trees
- CO₂ emissions from forest biomass burning will continue to be counted as 'zero' in the energy sector, worsening the climate crisis;
- Member States can still count energy from burning trees and other forest wood towards their national renewable energy targets, even though this undermines legislative targets to increase the EU's forest carbon sinks.

Call for strong implementation at national level:

While the EU outcome was disappointing, Member States retain some flexibility in the implementation of this Directive. They can choose whether to continue offering incentives for biomass plants, and they could choose to impose a moratorium on any new subsidy contracts before the RED is implemented. Without such a moratorium providers could avoid new criteria before they come into force. Even in RED II (Article 29(14) there was an explicit invitation for national governments to set stricter sustainability criteria than those in the final RED III text. We believe that Member States should implement the RED III according to Parliament's provisions, utilising the flexibility offered under RED II and RED III, rather than limiting themselves the final, weakened RED III text, which ignores the reality of degraded forests and loss of carbon sinks.

We call on you to set strong implementation measures for energy from woody biomass, based on the Parliament's recommendations, which will help safeguard our forests, biodiversity and climate goals for the future.

We hope that you will support this position and would be glad if you could raise these points in the September plenary debate.

Sincerely,

Marilda Dhaskali, EU Agriculture and Bioenergy Policy Officer

On behalf of
BirdLife Europe and Central Asia,
Euronatur,
Fern
Transport & Environment

Some key reference articles/briefings in case of interest:

- Forest Defenders Alliance comments on the RED III outcome: <https://forestdefenders.eu/european-parliament-vote-signals-the-beginning-of-the-end-for-forest-biomass-as-renewable-energy/>
- Fern's comments on the RED III outcome: <https://www.fern.org/publications-insight/new-eu-biomass-rules-a-crushing-defeat-for-forests-pushed-by-eu-member-states-2653/>

- Two op-eds in Euractiv & Politico by Dr. Mary Booth:

<https://www.euractiv.com/section/biomass/opinion/eu-countries-must-stop-undermining-biomass-policy-reform/>

<https://www.politico.eu/article/the-eu-climate-energy-crisis-renewable-energy-must-stop-burning-trees/>

How the EU is rapidly losing its carbon sink, and the role of biomass:

<https://www.euractiv.com/section/climate-environment/news/europe-rapidly-losing-its-forest-carbon-sink-study-shows/>