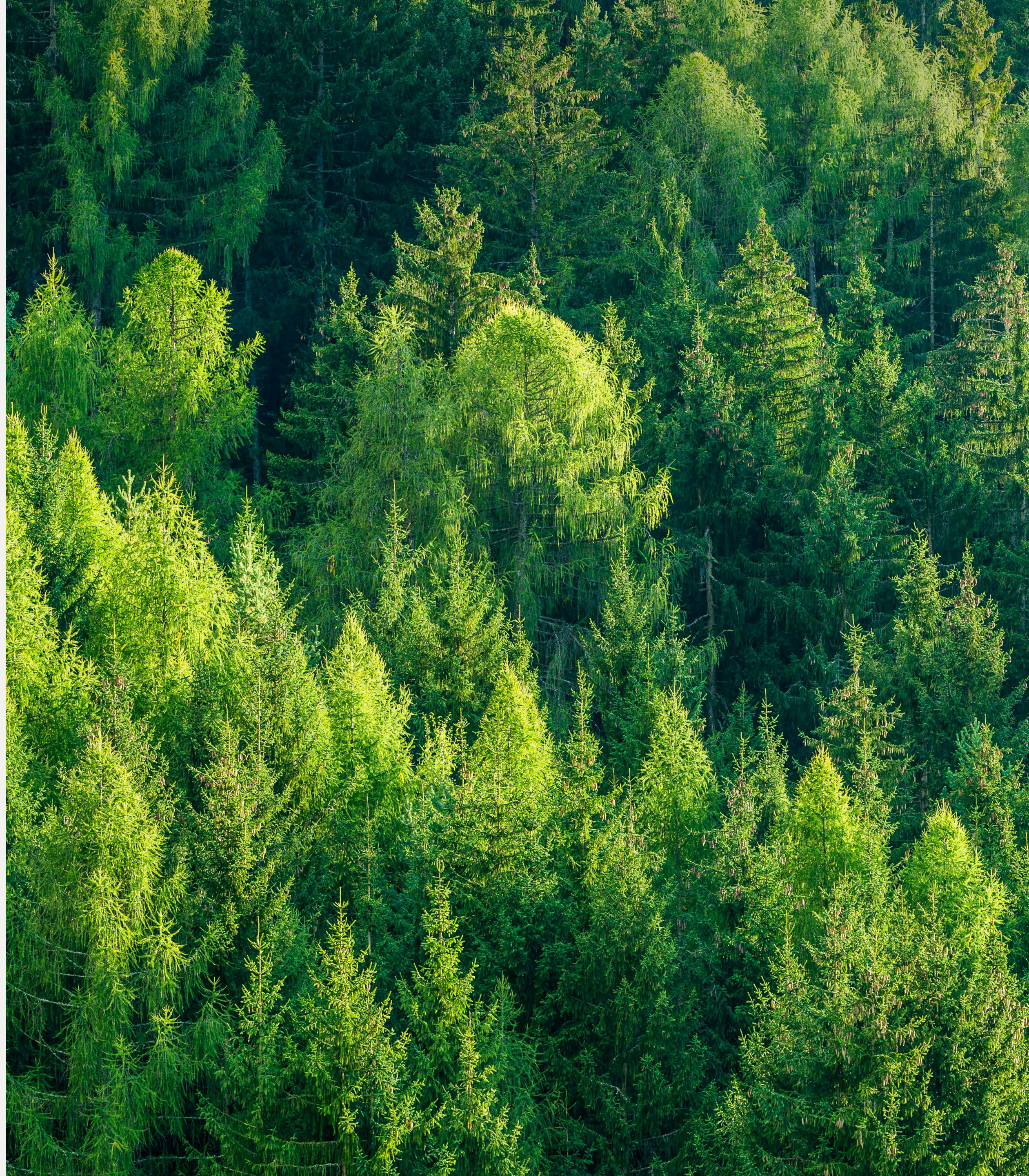


BIOENERGY AND CLIMATE TARGETS: AN ILL-MATCHED COUPLE

**Forests risk being sacrificed
to energy goals in the new NECPs**

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Bioenergy is harming European forests and undermines EU forest protection goals and climate targets

The European Union has ambitious plans to cut greenhouse gas emissions and tackle climate change, while it also aims to protect and restore forests across Europe. To do so, **the EU has set a new target for all land to absorb carbon by 2030** (with forests making significant contributions), introduced a new law under its Forest Strategy to prevent deforestation and degradation, proposed improved monitoring of forests, and is on the brink of introducing a Nature Restoration Law.

As we know, forests play a critical role in addressing climate change. They absorb and store carbon, purify air and water, protect people from increasing floods and rising global temperatures, and provide a refuge for millions of species.

But the EU's policy to incentivise the use of forest biomass for energy is in direct conflict with, and will undermine its efforts to, protect forests and meet its climate targets. A carbon accounting error in the EU

Renewable Energy Directive - which counts emissions from burning forest biomass as zero in the energy sector because it would be considered as a "renewable" form of energy - has driven a huge increase in harvesting wood from forests across the EU to be burnt in power stations. This error, which fails to acknowledge the time lag between emissions and reabsorption of the original carbon, has been pointed out for years by [hundreds of scientists](#) and [environmental experts](#). Multiple studies show this period can be very long - from decades to centuries.

Member States repeatedly exploit this error in their National Energy and Climate Plans (NECPs) - the blueprints for cutting national emissions, deploying renewable energy, and improving energy efficiency. One of the greatest threats to the protection of Europe's forests is the growing use of bioenergy across the Union.

Forests are needed as carbon stores to meet climate targets

Taking wood from forests (for energy use) increases pressure on forests because of the scale of demand. It is certainly not a carbon-neutral practice, as it takes [decades for trees to regrow and recover the carbon dioxide released](#) into the atmosphere when biomass is burned. A [review by the Joint Research Council of the European Commission](#) found that if fossil fuels were to be substituted with biomass, the only type of forest biomass feedstock that could provide carbon savings within five years without a negative impact on ecosystems or biodiversity would be “fine woody debris”, and even then only if their harvest would not undermine forest regeneration.

This feedstock represents minuscule amounts of wood compared to the overall bioenergy demand, and it is not used today because it is not technically suitable for biomass fuel production. But lots of different types of biomass are being harvested across the EU (and imported from

other countries), damaging forests and carbon stocks in Europe and other countries such as the US and Canada.

[Satellite analysis](#) shows that the area of annual tree canopy removal in Europe has expanded by 18% from 2001–2011 to 2012–2021, while at the same time harvesting intensity has increased (largely because of bioenergy). [The European Scientific Advisory Board on Climate Change recently](#) identified bioenergy as one of the reasons why the carbon sink’s capacity in European forests has shrunk.

If the EU does not achieve its goal for carbon storage by forests and land, this could undermine its chances of meeting its emissions reduction goal of 55% by 2030. The carbon dioxide that land is supposed to absorb by 2030 (310 million tonnes) would compensate more than 10% of EU emissions. But cutting down forests and using them for energy will erode their ability to store carbon and put this target at risk.

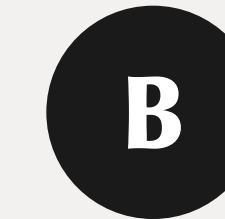
EU countries’ reports ignore impacts of using forest biomass

European Union Member States are currently preparing their new National Energy and Climate Plans (NECPs) for 2030. They submitted [draft NECPs](#) in late 2023 and final versions are due by the end of June 2024. The revised Renewable Energy Directive (RED) states that these new plans must explain how the use of bioenergy will be compatible with achieving the targets for land absorbing carbon since natural carbon sinks across the EU are [performing badly at the moment](#).

There are three specific requirements for Member States to include in their NECPs:



An assessment of the domestic supply of forest biomass available for energy purposes



An assessment of whether the use of forest biomass for energy is consistent with Land-use, Land-use Change and Forestry (LULUCF) targets and budgets (from 2026 to 2030)



A description of national measures and policies ensuring compatibility with those targets and budgets



NRDC has conducted a high-level assessment ([page 4](#)) of whether the draft NECPs meet the above requirements. It was conducted by an NRDC policy expert, assessing the contents of each NECP for the below requirements. Only Austria was omitted, due to the lack of a draft NECP.

Member State

	A	B	C
BELGIUM	Red	Red	Red
BULGARIA	Red	Red	Red
CROATIA	Red	Red	Red
CYPRUS	Orange	Green	Red
CZECH REPUBLIC	Orange	Orange	Orange
DENMARK	Orange	Orange	Orange
ESTONIA	Red	Red	Red
FINLAND	Orange	Orange	Orange
FRANCE	Orange	Red	Red
GERMANY	Red	Red	Red
GREECE	Red	Red	Red
HUNGARY	Orange	Orange	Orange
IRELAND	Orange	Red	Red
ITALY	Red	Red	Red
LATVIA	Red	Red	Red
LITHUANIA	Red	Red	Red
LUXEMBOURG	Red	Red	Red
MALTA	Red	Red	Red
NETHERLANDS	Red	Red	Red
POLAND	Red	Red	Red
PORTUGAL	Orange	Red	Red
ROMANIA	Red	Orange	Red
SLOVAKIA	Red	Red	Red
SLOVENIA	Red	Red	Red
SWEDEN	Red	Red	Red

A

An assessment of the domestic supply of forest biomass available for energy purposes

B

An assessment of whether the use of forest biomass for energy is consistent with Land-use, Land-use Change and Forestry (LULUCF) targets and budgets (from 2026 to 2030)

C

A description of national measures and policies ensuring compatibility with those targets and budgets

The vast majority of the draft NECPs fail to include the required assessment of forest biomass supply or its compatibility with LULUCF targets. **Romania** comes the closest to doing this by explicitly recognising that using woody biomass harms air quality and negatively affects LULUCF carbon stocks. However, even Romania's NECP does not meet the full requirements of analysing and quantifying these impacts.

NRDC's findings are in the table to the left. **Red** indicates that the requirement was not met at all, **orange** that it was partially met, and **green** that it was fully met.

NRDC's assessment corresponds very closely with the European Commission's own assessment of the draft NECPs which **recommends** that the vast majority of draft NECPs need to include this required content in their final versions.

In conclusion

It is highly significant that the great majority of draft NECPs do not provide the assessment required under the revised RED. This is not a mere administrative issue. The fact that none of these plans demonstrate how using bioenergy is actually compatible with protecting forest carbon sinks leads to one conclusion: they simply cannot, because using bioenergy at the current level, and even more at the scale they plan in the future, is not compatible with protecting forests and their carbon sinks.

Member State governments must update their final NECPs to address the requirements of the revised RED. But more importantly and fundamentally, Member States must be frank about the consequences for forests of their current bioenergy plans and revise these plans to ensure that they can actually meet their LULUCF targets.

There are only a few months left to act. Final NECPs must be submitted by the end of June 2024. National governments and the Commission must work together to protect Europe's forests and end the damage being done to them by bioenergy.

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