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Executive Vice-President for the European Green Deal

Kadri Simson  
Commissioner for Energy

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Commissioner for Environment, Oceans and Fisheries

Brussels, 13<sup>th</sup> April 2021

Dear Vice-President, dear Commissioners,

The Commission confirmed that the study<sup>1</sup> of the JRC is being taken into consideration by the relevant Commission services in the ongoing impact assessment of the revised Renewable Energy Directive and the Land Use, Land-Use Change and Forestry (LULUCF) Regulation 2021-2030, according to the JRC's role to provide the science base for policymaking.

The report identifies “lose-lose” situations whereby the pathway would damage forest ecosystems without providing carbon emission reductions in policy-relevant timeframes. The harvest of native, mature, high-biodiversity value trees for energy use, removal of coarse woody debris, removal of low stumps, and conversion of primary or natural forests into plantations are clear lose-lose options according to the Report.

Primary woody biomass (stemwood, treetops, branches, etc. harvested from forests) makes up at least 37% of the EU input mix of wood for energy production, and around 1/3 of it, 10% of the total could be attributed to stemwood from other than self-regenerating coppice forests<sup>2</sup>. Further 14% is uncategorised in the reported statistics, but based on the analysis, the source is more likely to be, again, primary wood, together thus possibly making primary wood 51% of the total wood use for energy purposes.

The “right” policy tools are not presented in the report. Who does offer a policy proposal is the EASAC, by way of limitation of the use of whole trees by using sustainability criteria that limit carbon payback times to less than 10 years<sup>3</sup>.

While the Directive is a part of the energy and climate package and itself highlights that increased use of energy from renewable sources constitutes an important part of the package

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<sup>1</sup> JRC, 2021: The use of woody biomass for energy production in the EU

<sup>2</sup> from the same study “20% of the total wood used for energy production is made up of stemwood, at least half of the stemwood used for energy is assumed to be derived from coppice forests”, thus still possibly leaving half (10%) to be stemwood from high forest

<sup>3</sup> in the respective statement of the European Academies' Science Advisory Council it was addressing concretely sustainable hydrogen, but it is valid for any type of energy generation

[https://easac.eu/fileadmin/PDF\\_s/reports\\_statements/Hydrogen\\_and\\_Synthetic\\_Fuels/EASAC\\_Hydrogen\\_Commentary\\_Web\\_publication.pdf](https://easac.eu/fileadmin/PDF_s/reports_statements/Hydrogen_and_Synthetic_Fuels/EASAC_Hydrogen_Commentary_Web_publication.pdf)



of measures needed to reduce greenhouse gas emissions and comply with the Union's commitment under the 2015 Paris Agreement and with the Union 2030 energy and climate framework, the rules set allow for a warming effect by increasing the CO<sub>2</sub> concentration for decades by labelling energy use of every type of woody biomass as renewable and sustainable. We further find ourselves in a situation where agricultural biomass for bioenergy cannot be directly produced from land that was, at any time after 2008, classified as primary forest or highly biodiverse forest and at the same time, the forest biomass for energy can be directly produced from a land that was old-growth, high-biodiverse or primary forest.

An honest broker in the discussion about 2030 climate target and the need to reduce emissions by [ at least 55%<sup>4</sup> ], up from 24% currently achieved, in light of the biodiversity targets it itself proposed and enabling conditions in order for these to be achieved it recognized<sup>5</sup>, would put on the table a recast of the Renewable Energy Directive where bioenergy provides carbon emission reductions in policy-relevant timeframes and does not pose a threat to forests, as one of our greatest allies in both climate and biodiversity crises.

Dear Vice-President, dear Commissioners, we undersigned MEPs call on you to open and amend the Renewable Energy Directive in the respective bioenergy-related articles.

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Delara Burkhardt (S&D)  
Anna Deparnay-Grunenberg (Greens/EFA)  
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Marie Toussaint (Greens/EFA)  
Michal Wiezik (EPP)  
Timo Wölken (S&D)

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<sup>4</sup> Amended proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the framework for achieving climate neutrality and amending Regulation (EU) 2018/1999 (European Climate Law)

<sup>5</sup> “The use of whole trees for energy production – whether produced in the EU or imported – should be minimised“ ( EU Biodiversity strategy for 2030)