

Statement on treatment of primary biomass in the Environment Committee discussion on the Renewable Energy Directive

We are deeply concerned about proposals to declassify primary forest biomass as renewable and remove the discretion of Member States to provide financial support for its use. These are radical and fundamental changes that will directly impact the EU's ability to meet its climate targets, diversify energy supplies and control costs for customers.

Primary biomass currently accounts for up to 51% of the EU's woody biomass use for power, heat and transport. Primary biomass includes tops, branches, damaged (e.g. by rot or insects) or twisted wood, and thinnings. It is not a by word for high value wood that would be used in solid wood products such as those for furniture and construction.

We acknowledge there are concerns that an increased EU biomass demand could have a negative impact on forestry. However, primary biomass used for energy is derived from wood residues that occur from harvests and forest management activities that are taking place anyway to provide wood to timber markets. Using these residual biomass streams can, and does, make a meaningful contribution to climate change mitigation.

Under the current definition discussed in the Environment Committee, the utilization of these residual wood streams would be severely disincentivized or stopped entirely. This is despite the IEA and the world's leading climate science body – the IPCC –noting in recent reports that both the use of mill and harvest residues are necessary and possible within the confines of sustainability^{1 2}. As primary biomass use must meet the strict sustainability and greenhouse gas saving criteria already outlined in REDII, and any changes made by REDIII, the risks associated with higher bioenergy demand will be managed.

The proposals currently discussed in the Environment Committee risk eliminating 20% of the EU's gross final renewable energy consumption³. This is three times the amount from solar and 1.2 times that from wind. Not only would it substantially move the starting line backwards, putting the EU's climate and energy targets at risk, but it would also necessitate the removal of already awarded financial support sending a terrible signal to investors.

The exclusion of primary biomass from the Renewable Energy Directive would also prevent its future use for further (combined) power and heat generation, in hard-to-abate sectors and for the production of negative emissions through Bioenergy Carbon Capture and Storage. This is in contradiction to most scenarios which show that bioenergy use must double by 2050^{4 5}. This move would delay, and possibly prevent, a successful energy transition.

¹ IPCC, 2022, Climate Change 2022: Mitigation of Climate Change

² IEA, 2021, Net Zero by 2050: A Roadmap for the Global Energy Sector

³ Based on bioenergy being 57.7%, forestry being 70% and primary biomass being 51%

⁴ JRC, 2020, Towards net-zero emissions in the EU energy system by 2050

⁵ EU Commission, (SWD 2021) 621, Impact Assessment accompanying Directive amending Directive (EU) 2018/2001

As was noted by the IEA, bioenergy has a key role to play as an alternative fuel in the context of the war in Ukraine and associated risks to current energy supply.⁶ Bioenergy makes up 11%⁷ of all energy consumed in the EU. As such the sudden removal of a substantial portion of the EU's most used bioenergy feedstock would also impact prices for industrial and residential users.

Bearing in mind the assured sustainability of this biomass and support from bodies such as the IPCC and IEA we strongly advise MEPs to change course and fully reinstate primary forest biomass as renewable and eligible for financial support. This would ensure that sustainably sourced primary forest biomass can continue to play its key role in delivering EU climate targets and energy security.



⁶ IEA, 2022, A 10-Point Plan to Reduce the European Union's Reliance on Russian Natural Gas

⁷ Deloitte, 2022, Towards an Integrated Energy System: Assessing Bioenergy Socio-Economic and Environmental impact