



**To: The permanent representations of member states to the EU**

**Concerns: REDII Joint appeal on forest biomass sustainability**

Brussels, 5 March 2018

Dear Attaché,

With this letter, the undersigned organisations would like to underline the importance of a number of key provisions in the recast of the Renewable Energy Directive (REDII) to prevent that the use of forest biomass for energy leads to the distortion of raw material markets, as well as to an unsustainable use of wood as a limited resource.

Today, forest biomass provides the biggest resource for renewable energy production in the EU. Commission data has indicated that the current RED has led to an increase in wood use for the production of heat and power, also in inefficient large scale power-only installations.

This trend is not sustainable. A growing wood demand for bioenergy can further lead to increasing forest harvests and pull away biomass resources from more efficient uses of woody biomass, such as material production. Both these dynamics could have a negative effect on the climate and the overall carbon balance of bioenergy as well as on the efficient use of natural resources.

It is therefore crucial that the RED for the period post 2020 includes adequate safeguards to mitigate these risks.

**We'd ask your support for the following proposals:**

- Support schemes and market distortion (EP AMs 321, 332 and EP AM 116 on Article 3 and 4(1))  
EP AMs 312/332 aim to ensure that Member States, when designing support schemes for renewable energy production, take into account sustainable levels of supply of biomass and take precautionary measures (e.g. prioritising the use of forestry waste and residues and ensuring

the use of biomass is in line with principles of the circular economy and the waste hierarchy) in order to prevent unnecessary distortion of raw material markets or the use of biomass that can be used for products providing a 'higher added-value'. In parallel, it is thus important to allow Member States (i) to apply technology-specific support schemes based on environmental constraints (EP AM 116) and to avoid distortion of raw material markets (Council AM), and (ii) to allow Member States to put in place additional requirements for forest biomass (Article 26(10)).

- Heating target (Article 23(1) and AM 197)

Almost 90 per cent of renewable heat is generated by biomass. An ambitious heating target has the danger of leading to increased biomass demands that cannot be supplied sustainably without distorting raw materials markets. An indicative technology-neutral target for renewable heating should be accompanied by a requirement that Member States prioritise the best available technologies (EP AM 197).

- End support to biomass use in inefficient large scale power-only installations (Article 26(8))

Following the EU's objectives to mitigate climate change, use resources more efficiently and promote a circular economy, it cannot be justified to promote the burning wood in inefficient power stations. Support for biomass in large installations should therefore be limited to those that have high efficient co-generation technology. This requirement should apply to all types of biomass installations from 20 MW and higher, whether they co-fire biomass with fossil fuels or not and including those installations which have been converted from coal to biomass.

We'd also note the importance of strict reporting requirements on forest biomass in the context of the EU Governance Regulation, in order to allow the Commission to review the effectiveness of the 'risk-based approach' on forest biomass (Article 26(5)(6)) based on comprehensive and accurate data.

We kindly urge the Council to agree on a legal text that adheres to the above mentioned concerns.

Yours sincerely,

Birdlife Europe  
European Furniture Industries Confederation  
European Panel Federation  
Fern  
Transport & Environment  
Zero Waste Europe  
Client Earth