



## Europe's National Energy and Climate Plans 2030: Are they fit for purpose?

EU Member States' [National Energy and Climate Plans](#) are due to be published by the end of this year. It is critical that we get them right as they explain how we will achieve EU climate targets in the next 10 years. But such targets will be incredibly difficult to meet if the plans don't also increase biodiversity - the wide variety of plant and animal life our land and oceans support.

*Forests are an essential part of both climate and biodiversity action*

### So, what should the plans include?

The Intergovernmental Panel on Climate Change's Special Report on Land was clear that **forests are an essential part of both climate and biodiversity action**. Despite this, a [recent EU Commission report](#) found that European forests are absorbing less carbon dioxide each year, and that the main reason "is the increase in harvesting rates."

To a large extent, this increased harvesting is due to perverse incentives based on faulty carbon accounting which encourage Member States to increase the amount of forest biomass they burn for energy.

The plans must therefore prioritise investment in real renewables and the protection and restoration of our best natural climate solution - forests.

### Fern's analysis

To find out whether they are fit for purpose, Fern analysed the National Energy and Climate Plans of five Member States - [Denmark, Germany, Romania, Slovakia and Sweden](#) - as well as information from their [National Forestry Accounting Plans](#).

We wanted to find out how transparent they are on four issues:

1. Source of wood for material and energy use
2. Ratio of wood for material versus energy use
3. The forests' ability to remove carbon from the atmosphere
4. Plans to protect forests and biodiversity

The results make for uncomfortable reading.

They reveal such a paucity of data that it is impossible to assess the climate, forest and biodiversity impact of each Member State's activities.

We urge Member States to work together to provide comprehensive information on all these points. That is the only way they can prove they are planning to take transparent, ambitious and sustainable action to meet climate goals.

Once we have the final plans we will re-evaluate them to analyse their climate impact.

## DENMARK

Denmark imports and burns more wood pellets for energy than almost any country in the world. Between 2015 and 2018 it provided nearly EUR 1 billion in tax exemptions to the bioenergy industry.

To assess the full climate impact of Denmark's climate and energy plan to 2030, we looked at how transparent it is in four categories: Source of wood for material and energy use; ratio of wood for material versus energy use; the forests' ability to remove carbon from the atmosphere and plans to protect forests and biodiversity.

### What the Plans say about bioenergy:

- Sixty-seven per cent of renewable energy will come from biomass by 2030 under current policies and measures.<sup>1</sup>
- "Solid biomass will play an important role in the conversion of the remaining central power plants still operating on coal".<sup>2</sup>
- The percentage of wood being used for industrial roundwood dropped from 40 per cent in 1999 to 10 per cent in 2016<sup>3</sup> (meaning more wood is being burnt).

### What the Plans say about Denmark's forests:

- Only 5.7 per cent is protected (we calculated this number based on information in the plan. However, more nuanced information and the meaning of 'protected' was found in other sources, see below).
- They will be a net source of emissions by 2030, in a trend expected to continue until 2050.<sup>4</sup>



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### Additional information from other sources:

- The **EU's Joint Research Centre**: in 2015, 22 per cent of wood used came from unaccounted sources. Around half of the wood from unaccounted sources was burnt for energy.
- **Natural Resources Defense Council**: in 2017, Denmark spent €87 million subsidising bioenergy.
- **Copenhagen University**: 3.5 per cent of Danish forest is formally protected against commercial forestry, and five per cent is completely unmanaged, i.e. is not undergoing any kind of forestry.

## Scorecard

	Transparency	Climate impact
Source of wood for energy and material use	No information	Pending official information
Ratio of wood for energy versus material use	No information	Pending official information
Forests' ability to remove carbon from the atmosphere	Information provided	Dangerous: the forest carbon sink will emit 1.2 million tons of carbon dioxide equivalent by 2030
Forest protection and biodiversity	No information	Without this information it is not possible to say, but only 5.7 per cent is protected

## Conclusion

Denmark must provide comprehensive information on how it will ensure the sustainability of its biomass supply and prove that it will fully account for the climate and environmental impacts of biomass harvesting.

1 NECP P. 76  
2 NECP P. 46  
3 NFAP P. 53  
4 NFAP P. 36