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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.

GERMANY

Climate change as well as past management practices such as planting monocultures of badly adapted species is already destroying large woodland areas in Germany, and the Ministry of Agriculture is planning to unlock millions of Euros to help re-establish those forests. As 32 per cent of Germany is covered by forest (only 5.9 per cent of which is not available for wood supply), this will make a huge difference to the climate and citizens' lives.

What the Plans say about bioenergy:

- Germany will have less bioenergy in its energy mix in 2030. Twenty three per cent of their renewable energy will come from biomass in 2030, unless additional policies and measures are introduced.[1] However, it is important to realise that total biomass use for energy increased by 51 per cent between 2005 and 2015.
- Between 2010 and 2017, bioenergy for electricity has increased by 60 per cent.[2]
- Between 2021 and 2030, bioenergy for electricity will decrease by 15 per cent.
- Sustainability is a priority, they will consider "efficient use of waste and residual materials, taking into account the cascade of use" and the need to avoid negative climate and biodiversity impacts when importing biomass, but there is no clarity on where biomass would come from.

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What the Plans say about Germany's forests:

- Only 2.9 per cent of forests are "strictly protected" but 17 per cent falls under Natura 2000.
- German forests will annually remove 39.2 million tons of carbon dioxide equivalent between 2021-2026.[3]
- The Land Use, Land Use Change and Forestry sector is likely to become a net emitter, although it is not clear why.

Additional information from other sources:

- Increment, felling and wood removal information is not consistent with EUROSTAT figures.
- The **Convention on Biological Diversity 5th National Report** and **Nature Conservation Action Programme 2020** identify the transformation of the energy supply system to burning biomass for heating and cooling as a potential new risk to biodiversity.

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, but no trajectory given.	Too little information to be conclusive.
Forest protection and biodiversity	Little information	Too little information to be conclusive.

Conclusion

Germany's National Energy and Climate Plan needs to say how Ministry of Agriculture funds would be spent. It should also provide information on domestic and imported biomass and the development of the Land Use, Land Use Change and Forestry sink.

1 NECP P. 133
2 NECP P. 108
3 NFAP P. 1

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