



Deutsche Umwelthilfe



EURONATUR



NRDC
NATURAL RESOURCES
DEFENSE COUNCIL



ROBIN WOOD

13 May 2022

Subject: Keeping bioenergy out of RePower EU

Dear President of the European Commission Ursula von der Leyen, Executive Vice President for the Green Deal Frans Timmermans, and EU Commissioners Janusz Wojciechowski, Kadri Simson, Stella Kyriakides and Virginijus Sinkevičius.

We write to express our outrage about the leaked proposal to include bioenergy in the upcoming RePower EU Joint European Action plan, whose adoption is expected on May 18th.

Burning forest biomass and crop biofuels worsens the climate crisis and undermines food security globally. It also costs the EU billions in public health costs due to the air pollution it causes.

On 8th March 2022, the European Commission published its Communication about RePower EU,¹ supporting only one type of bioenergy: biomethane produced within the EU.

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In doing so, the Commission implicitly acknowledged that solid biomass, over 90% of which is wood, as well as biofuels for transport, have no role to play in replacing Russian fossil fuel imports while advancing a 'rapid clean energy transition'.

However, the leaked proposal, which could be adopted by the Commission on 18th May, now states: *"Bioenergy...is a domestically available and stable energy source, especially solid biomass for some forest-rich Member States. As long as the strengthened safeguards for its sustainable sourcing are put into place and complied with, increased bioenergy use can contribute to replacing Russian imported fossil fuels including natural gas, e.g. for heating."*

This statement is false. Increasing biomass use is not possible without a significant increase in logging, in Europe and abroad, which will significantly further degrade forests all around the world as well as Europe's own land carbon sink.

1. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022DC0108&from=EN>

2. <https://op.europa.eu/en/publication-detail/-/publication/b9c0db60-11c7-11eb-9a54-01aa75ed71a1/language-en>

Further, burning wood cannot replace any meaningful fraction of Russian fossil fuels. **To replace the energy from even just 10% of Russian fossil fuel imports would require at least a 60% increase in wood-burning.**³

In fact, bioenergy already makes up too much of Europe's renewable energy. The EU's forest ecosystems are in rapid decline, and the EU's forest carbon sink is shrinking by the year, endangering the EU's climate neutrality objective. Since logging and burning nearly all forms of forest biomass degrades ecosystems and increases CO₂ emissions compared to fossil fuels, contrary to the bioenergy lobby's misleading claims, this proposal is incompatible with the stated RePowerEU goal of rapidly advancing a transition to clean energy and contributing to EU climate goals.

While we fully support the EU's aims of rapidly transitioning to cleaner energy as well as ending energy imports from Russia, **we urge you to keep a science-based position on this and to reject the proposal to include bioenergy in the RePower Europe Joint Action plan.** Precisely because of the Ukraine war, the last thing forests and people need today is an additional pressure on land use, particularly for an inefficient source of energy like bioenergy that requires at least ten times more land than solar photovoltaics (PV) for the same energy output.

Kind regards,

- BiofuelWatch
- BirdLife International
- Comité Schone Lucht, *Netherlands*
- Deutsche Umwelthilfe, *Germany*
- Environmental Investigation Agency (EIA)
- EuroNatur
- Fern
- Fertő Tó Barátai Egyesület, *Hungary*
- Leefmilieu, *Netherlands*
- Luonto-Liitto, *Finland*
- Mobilisation for the Environment (MOB), *Netherlands*
- Natural Resources Defense Council (NRDC)
- NOAH - Friends of the Earth Denmark
- Partnership for Policy Integrity (PFPI)
- Pracownia na rzecz Wszystkich Istot, *Poland*
- Protect the Forest
- RobinWood
- Saving Estonia's Forests
- The Finnish Association for Nature Conservation (FANC), *Finland*

3. <https://forestdefenders.eu/replacing-just-10-of-russian-fossil-fuels-with-wood-will-obliterate-even-more-forests/>