



9 January 2018

EU proposals on bioenergy: a serious threat to climate and sustainable development goals

Dear Members of the European Parliament,

On behalf of our tens of millions of members, supporters and activists around the world, we write to you to ask for your support for crucial changes to the proposed rules on bioenergy in the European Union's Renewable Energy Directive (RED).

As advocates in the fight against climate change and for environmental protection and social justice, we recognise the European Union's important role in these areas, and its efforts to reduce greenhouse gas emissions, protect forests, and safeguard the communities and species that depend on them. The revision of the RED is an opportunity to reinforce these objectives, and we fully support calls for an ambitious EU 2030 renewable energy target consistent with the Paris Agreement and a transition to a fully renewable energy system. At the same time the EU must deliver on its commitments under the United Nations 2030 Sustainable Development Goals to eradicate extreme poverty and hunger.

However as leading scientists [have made clear](#), the proposals relating to bioenergy that are currently under discussion in the EU institutions are deeply flawed and pose a serious threat to global climate and sustainable development goals. The proposals would encourage a further expansion in the use of trees and agricultural crops for energy, which multiple peer-reviewed studies, including ones commissioned by EU institutions and Member States, have shown *increases* emissions compared to fossil fuels, and results in other damaging social and environmental impacts.

The provisions currently foreseen in the RED will not stop this happening, as they are based on: (i) incomplete greenhouse gas criteria that leave out the most important contributors to net emissions (for both biofuels and forest biomass); (ii) sustainable forest management (which is in no way a proxy for accounting for the greenhouse gas impact of burning wood); and (iii) flawed land use, land-use change and forestry (LULUCF) accounting (both in the European Union and elsewhere) under which burning trees and crops would still be perfectly possible.

To avoid EU rules on bioenergy having serious unintended consequences, and creating the need for future policy U-turns, we urge you to:

- Exclude from subsidies or other policy incentives the burning of **stemwood and stumps**, which will typically increase emissions for decades to centuries compared to fossil fuels, and the use of forest biomass in large-scale, inefficient power plants that do not use 'co-generation' technology to produce combined heat and power.
- Phase out support for **biofuels from purpose-grown crops**, and oppose any transport targets that do not exclude their use or that incentivise unsustainable 'advanced' biofuels (the raw materials for advanced biofuels should be limited to genuine wastes and residues that comply with the waste hierarchy, the principle of cascading use and strong sustainability criteria).

These common-sense reforms would direct public subsidies and private investment away from counterproductive forms of bioenergy and towards cleaner, more sustainable alternatives. They would also provide much needed policy stability for investors, farmers, and forest industries.

The world still looks to the European Union for leadership on climate change and sustainable development and is likely to follow the example that it sets. As you cast your votes this month, we urge you to support bioenergy rules that the European Union can be proud of and that will help, not hamper, our shared and critical fight on climate change and sustainable development.

Yours faithfully,

Andrea Kohl, Director, WWF European Policy Office
Rhea Suh, President, Natural Resources Defense Council
Natalia Alonso, Oxfam International Deputy Director of Advocacy & Campaigns, Head of Oxfam EU
Jorgo Riss, Director, Greenpeace European Unit
Jagoda Munić, Director, Friends of the Earth Europe
Wendel Trio, Director, Climate Action Network (CAN) Europe
Ariel Brunner, Senior Head of Policy, Birdlife Europe
William Todts, Executive Director, Transport & Environment
Saskia Ozinga, campaigns coordinator, fern
Blanche Weber, President, Mouvement Ecologique
Danna Smith, Executive Director, Dogwood Alliance
Ioana Ciuta, President, Bankwatch Romania Association
Rick Middleton, Executive Director, Southern Environmental Law Center
Philip B. Duffy, President and Executive Director, Woods Hole Research Center
Ella Maria Bisschop-Larsen, President, Danish Society for Nature Conservation
Steve Trent, Executive Director, Environmental Justice Foundation
Francisco Ferreira, President of the Board, ZERO - Associação Sistema Terrestre Sustentável

Siim Kuresoo, Vice Chairman of the Management Board, Estonian Fund for Nature
Gry Bossen, Forests of the World
Ojar Kristal, CEO, Estonian Students Society for Environment Protection "Sorex"
Mary Booth, Director, Partnership for Policy Integrity
Janis Brizga, Chair, Green Liberty
Steven Vanholme, Program Manager, EKOenergy
Mihai Stoica, Executive Director, 2 Celcius
Lavinia Andrei, President, TERRA Mileniul III Foundation Romania
Liviu Cioineag, Executive Director, Coalition Natura 2000 Romania
Marie Sigvardt, Head of Programs, Save the Orangutan
Sanjeev Kumar, Founder, Change Partnership
Salla Tuomivaara, Executive Director, The Finnish Nature League
Wolfgang Kuhlmann, Director, ARA