



Open Letter

16 December 2020

To: Executive Vice-President Frans Timmermans

Cc: Commissioners Kadri Simson, Janusz Wojciechowski, Mariya Gabriel, Margrethe Vestager, Virginijus Sinkevičius, Mairead McGuinness, Valdis Dombrovskis.

Re: EU support for energetic and nonenergetic use of biomass

Dear Executive Vice-President,

We are writing in regard to a [letter](#) you received on 9 December containing claims that seek to undermine the important role of biomass in addressing global climate change and meeting the policies set out by the European Green Deal. We would respectfully call your attention to three important facts.

1) The world's leading authority on climate science continues to recognize sustainable bioenergy as an important climate change mitigation tool. In its [special report on land use](#) from August 2019, the Intergovernmental Panel on Climate Change (IPCC) indicated that all scenarios that keep the planet's warming below 1.5C include the use of sustainable biomass. The report further states, "A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber or energy from the forest will generate the largest sustained mitigation benefit."

When biomass is sourced from forests where carbon stocks are stable or increasing, emissions from bioenergy at the point of combustion are offset by forest regrowth in the forest landscape where the fuel was produced, thereby qualifying biomass as a carbon-neutral energy resource.¹² Biomass is rightly included in the Renewable Energy Directive as it is part of the biogenic carbon cycle, which is acknowledged by the IPCC and understood by forest and climate experts around the world. There is no scientific basis on which to change that assessment.

¹ <http://naufpr.org/wp-content/uploads/2019/10/2019-Final-Carbon-Accounting-Science-Fundamentals-with-signatures.pdf>

² <https://academic.oup.com/jof/article/112/6/591/4599652>

2) Energetic and non-energetic use of sustainable biomass must play a significant role for the EU to achieve carbon neutrality by 2050. Sustainable biomass is currently responsible for almost 60% of all renewable energy consumption in the EU³. For several Member States, bioenergy is indispensable in their transition from fossil fuels and has largely replaced oil, gas, and coal in the electricity and heating sectors. In its recent literature review “Towards net-zero emissions in the EU energy system by 2050⁴”, the Commission’s Joint Research Centre underlines that a growth of energetic use of biomass from 15% to 60% compared to current levels will be needed in order to achieve a 50% GHG emission saving by 2030. Further, in the recently published 2030 Climate Target Plans impact assessment, biomass remains the largest renewable across multiple scenarios, and further growth especially in non-energetic areas is projected towards 2050.

3) Biomass sustainability is guaranteed via strict, harmonised, Union-wide sustainability criteria laid down in the Recast Renewable Energy Directive. Together with risk-based forestry certification schemes, the REDII criteria underpin the sustainability of biomass. According to government data, forest inventory and carbon stocks are higher in biomass source forests today than when the industry began more than a decade ago, underscoring its ability to operate sustainably.

EU28 forests have also been experiencing increasing carbon stocks over the past decades. In 1990, European forests represented a total of 19,2 billion m³. In 2020 forest stock reached 28,3 billion m³, equivalent to an increase of 47% over the period between 1990 and 2020.⁵ Similarly, forests in the US Southeast, which are the EU’s largest source of imported biomass, have seen forest stocks increase more than 100% since 1953⁶. This further shows that current practices and regulations with respect to using only low-value feedstocks results in more forests, not less.

Energetic and non-energetic uses of biomass are integral parts of sustainable circular economic development. A sustainable bioeconomy is based on sustainable production, trade, and use of independently certified bio-based raw materials; such a bioeconomy necessarily exists alongside other renewables.

In light of these facts, we urge the Commission to continue basing its bioeconomy policies on established science. Photos of clear-felled forests are not substitutes for data on forest health. They are not evidence of unsustainable forest management practices, and are used to deliberately mislead about bioenergy’s place at the bottom of the forest value chain. Moreover, these images belie the fact that replacing carbon-intensive products – whether they are consumer goods, building materials or energy – with renewables sourced from sustainably-managed forests are essential to solving the challenge of climate change.

Europe is the global leader in biomass sustainability. The requirements set forth in its current sustainability framework reduce the carbon footprint of bioenergy along the value chain, and its sustainability criteria apply irrespective of the geographical origin of biomass, preventing negative environmental impacts on forests in other countries. This framework will be enforced all over Europe starting July 2021, ensuring that in accordance with established science, biomass will continue to deliver tangible benefits for our forests and climate.

³https://publications.jrc.ec.europa.eu/repository/bitstream/JRC109354/biomass_4_energy_brief_online_1.pdf

⁴ Tsiropoulos et al. (2020) Towards net-zero emissions in the EU energy system by 205, p.24

⁵ Bioenergy Europe Statistical Report 2020 – Biomass Supply

⁶ https://www.forest2market.com/hubfs/2016_Website/Documents/20170726_Forest2Market_Historical_Perspective_US_South.pdf

We support the Commission's climate, biodiversity and socio-economic objectives as expressed in the Green Deal, and believe the bioeconomy industry has a critical role to play in achieving these goals.

Thank you for your continued leadership, and please contact us if we can be of assistance.

Sincerely,

Christian Rakos
President
World Bioenergy Association

Jean-Marc Jossart
Secretary General
Bioenergy Europe

Seth Ginther
Executive Director
U.S. Industrial Pellet Association

Luuk van der Wielen
Chair, Board of Platform Bio-economie
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