

Bioenergy Europe response to REDII public consultation.

Brussels, 10 February 2021 - Bioenergy Europe has submitted its response to the Public Consultation on the Directive 2018/2001/EU (REDII) aimed at gathering stakeholder views on how the Renewable Energy Directive should be revised.

This exercise is being carried while the transposition of REDII sustainability criteria for solid biomass at national level still has to take place.

The Renewable Energy Directive should be equipped with the appropriate targets and objectives to contribute to higher GHG emissions savings to achieve the carbon neutrality by 2050. Bioenergy Europe believes that the review of REDII should be limited to simple adjustments to provide market operators with the necessary legal certainty and long-term perspectives. Indeed, REDII came into force only in 2018 and the deadline for transposition for most provisions is July 2021

The basics

Bioenergy represents today the largest renewable energy source in the EU and in the majority of the EU27 Member States (almost 57% of the RES mix in 2019). Not only bioenergy is mainly produced with local biomass (imports dependency being a mere 3.5% in 2018 for the whole sector and 2.7% for woody biomass), it generates a considerable economic growth and jobs (more than 700.000 indirect jobs in 2018). Most importantly, its contribution is key for climate change mitigation: greenhouse gas emission savings scenarios from European and International sources (including European Commission, IPCC and IEA) heavily rely on bioenergy deployment.

Burning fossil fuels releases carbon that has been locked up in the ground for millions of years, while burning biomass emits carbon that is part of the biogenic carbon cycle. Sustainable bioenergy offers a concrete solution in GHG emissions abatement while providing renewable heat, electricity and transport fuels.

According to EC's modelling of energy system development presented in the communication '*Stepping up Europe's 2030 climate ambition*'¹ bioenergy will remain an important element of the EU energy mix. Ultimately, its flexibility can complement intermittent renewable sources (i.e. solar or wind) and provide solutions for off-grid areas.

As [concluded by the recent Joint Research Centre \(JRC\)](#)² study on the use of woody biomass for energy, a swift and robust implementation of REDII sustainability criteria will effectively minimise negative impacts associated with the use of woody biomass for energy.

REDII sustainability criteria: pioneering the renewable energy transition

Following a long and inclusive decision making process, in 2018 the European Commission introduced for the first time sustainability criteria for solid biomass within the framework of the REDII directive. To date, no other industry is subject to such strict measures.

These sustainability criteria are already robust and effective, requiring among others that *i)* biomass is not sourced from lands that will not be replanted, *ii)* sensitive areas are protected, *iii)* forest carbon stocks remain stable or increase across the sourcing region, and that *iv)* harvesting respects biodiversity and soil quality. The Directive also imposes further requirements to minimise the risk of using forest biomass derived from unsustainable practice. All these criteria are subject to third party verification.

The bioenergy industry and actors of the value chain are preparing to comply with the new rules to ensure full compliance by the mid-2021, being *de facto* a front-runner in the sustainability and EU climate change mitigation efforts.

Considering that the REDII is not yet transposed at national level and, most Member States are still waiting for the European Commission to issue their operational guidance, it appears clear that today, any revision exercise for REDII should only focus on limited adjustments to provide market operators with the necessary legal certainty and long-term perspectives.

The perverse effects of a possible premature revision of the REDII

Bioenergy Europe supports higher overall RES targets as the only way forward in achieving EU climate objectives. The REDII should be equipped with the appropriate tools to contribute to higher GHG emissions savings.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562>

² https://publications.jrc.ec.europa.eu/repository/bitstream/JRC122719/jrc-forest-bioenergy-study-2021-final_online.pdf

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However, in its response Bioenergy Europe reiterates that at this stage it is of paramount importance to ensure the respect of legal certainty rules and that these can only be secured through properly enforced and monitored existing legislations.

Any attempt to revise the sustainability criteria – even before these are transposed and scrutinised - would be detrimental for thousands of businesses (mostly SMEs) which undertook early efforts to adapt to the future legislation. Namely, it will create unnecessary legal uncertainty, additional administrative burden for businesses, and negatively impacts investors' confidence.

Ultimately, far from investing in innovation and sustainable sourcing strategies, legal uncertainty hampers climate change mitigation objectives. In short, there is no scientific or practical reason to reopen the bioenergy sustainability criteria within the REDII.

The art of delegitimization

The bioenergy industry is facing unprecedented scrutiny. Several well-coordinated actions are carried out in order to delegitimize its role in the energy transition through sensationalistic use of wording, images, and [media coverage](#).

Beyond this, the current anti-bioenergy positions demonstrate the unwillingness to understand the complexity of the industry through oversimplifications that disregard some basic aspects of forestry, carbon cycle and sustainable bioenergy.

Sustainable forest practices have multiple roles. They ensure carbon uptake remains equivalent or higher than harvesting, keeping resilient and biodiverse forests for centuries to come, while keeping socio-economic benefits for rural areas all over Europe. All pillars of sustainability are important.

With the Green Deal we are at the dawn of a new bioeconomy era in which biorefineries will generate greener value chains. Bioenergy relies on residues of wood-based industries and is a solid partner to strengthen the bioeconomy

The REDII public consultation, as it was the case for the [Taxonomy public consultation](#), saw an unprecedented number of answers. The bioenergy industry trusts the Commission is taking in consideration the use of petition-like platforms to submit the same reply on the behalf of signatories. However, it also wonders whether this approach is creating a precedent that potentially distort the actual purpose of the public consultations.

Concluding remarks

Two weeks ago, the Joint Research Centre report highlighted that *“divergences in values should be acknowledged and discussed explicitly, also within the scientific community, in order to de-toxify the debate surrounding the sustainability of woodbased bioenergy”*.³

Taking in consideration the current debate and media attention, Bioenergy Europe favours a constructive debate with all parties involved.

As it occurred with the REDII back in 2018, the bioenergy industry is ready to demonstrate its role as key player in providing efficient solution to current climate challenges. But the industry urges policy-makers to ensure a stable framework in which to operate.

Read Bioenergy Europe response to the consultation [here](#).

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³ https://publications.jrc.ec.europa.eu/repository/bitstream/JRC122719/jrc-forest-bioenergy-study-2021-final_online.pdf