
Increase the share of renewables in 2030 (Art. 3 RED)
The proposed EU target of 27% renewables share in 2030 is not ambitious enough. If Europe truly wants to be the world leader in renewable energies, it needs to deploy at least as much new renewable energy capacity in the next decade as in the current one.

Strengthen the requirement on renewable Heating and Cooling (H&C) progress (Art. 23 RED)
The H&C sector represents 50% of total EU energy consumption. The energy transition will not happen without effectively decarbonising this sector.

Explicitly recognise the potential of renewables to reach energy efficiency objectives (Art. 7 RED)
Renewable H&C technologies are efficient technologies that lead to energy savings. To be in line with EU long-term climate objectives, a switch to efficient RES should always be prioritised over fossil fuels, even the most efficient ones.

Ensure that the Primary Energy Factor (PEF) reflects real energy savings (Annex IV EED)
The revised PEF could impact the eco-design and energy labeling calculation methodologies. A value lower than 2.2 applied to these legislations would unfairly promote low-quality electric heating appliances and misinform consumers.

Strengthen the role of RES in the implementation of long-term renovation of buildings strategies (Art. 2a EPBD)
The challenge to decarbonise the building sector, which is responsible for 30% of total EU energy consumption, lies in the existing stock of buildings. Sending a strong political signal by adding a reference to the RED Art. 15 in Art. 2a of the EPBD, is needed to promote a switch to renewable heating sources, and ensure the long-term decarbonisation of the building sector.

Design support schemes in a way that would allow different renewable technologies to develop (Art. 4 RED)
Technology-specific tendering is key to ensure the most cost effective deployment of a sufficiently broad portfolio of renewable energies. Renewable projects under 10 MW should be exempt from tendering procedures to promote smaller projects and businesses, community groups or farmers.

AEBIOM position on sustainability of bioenergy

Support the proposed 20 MW scope for implementing the sustainability criteria (Art. 26.1 RED)
This threshold is appropriate as 80% of woody biomass is consumed in installations >20MW which represent only 12% of installations with a capacity above 1Mw in Europe.

Support a risk-based approach based on national and subnational laws or at the supply base level (Art. 26.5 RED)
The use of national and subnational laws is appropriate as it builds on existing Member State and third country legislations on forests and forest management. The forest holding level should be replaced by the supply base level. This would respect the subsidiarity principle and allow to build on already existing initiatives. The burden of responsibility to prove sustainability should not fall on forest owners.

Lower the GHG emissions savings threshold to 70% (Art. 26.7 RED)
This is important to enable economic operators to use default values, thus avoiding costly operations calculations as well as obtaining more visibility and certainty on their projects. This would also ensure a level playing field for advanced biofuels for transport.

Adopt a more rational approach on biopower (Art. 26.8 RED)
Biopower is and will continue to play an important role in the EU’s electricity system as a flexible and reliable source of renewable energy. This role should be better acknowledged and supported.

Provide a stable and equal framework to economic operators (Art. 26.10 RED)
After years of discussion, economic operators need certainty on the sustainability rules in order to continue developing their projects, as any other type of economic operators. Sustainability rules should be harmonised at EU level with no possibility to define additional national criteria, and should be set for the period 2020-2030.

The European Biomass Association (AEBIOM) is the common voice of the bioenergy sector with the aim to develop a sustainable bioenergy market based on fair business conditions. AEBIOM is a non profit Brussels based international organisation founded in 1990 that brings together around 40 associations and 90 companies from across Europe thus representing more than 4000 indirect members including mainly companies and research centers.