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Bioenergy Europe answers to the call for evidence on RED post-2030 Framework

Bioenergy Europe, the European association for the bioenergy sector, welcomes the opportunity to provide feedback on the Renewable Energy Directive framework after 2030.

We fully support the Commission's efforts to update the renewable energy policy infrastructure for the decade ahead. This is even more relevant, given the **current geopolitical situation, which requires a reliable, homegrown, affordable, and fully defossilised energy system.**

Sustainable bioenergy is a core pillar of the EU's climate mitigation efforts and makes a significant contribution to European security of supply, providing almost 11%¹ of the EU's energy consumption. Commission analysis indicates that bioenergy use will need to increase by approximately 69% to meet the EU's 2050 climate neutrality target. This includes applications in renewable heat and power, high-temperature industrial processes, advanced fuels, and carbon removals through Bioenergy with Carbon Capture and Storage (BECCS) and Biochar Carbon Removals (BCR).

For the development of the policy framework after 2030, Bioenergy Europe proposes to:

1. **Ensure A Stable Energy Policy Framework**
2. **Avoid a Dogmatic Approach to the Cascading Principle and Recognise Local Realities**
3. **Promote Administrative Simplification and Better Harmonisation**
4. **Keep A Systemic Approach for Energy Security**

Ensure A Stable Energy Policy Framework

Biomass supply is typically local or secured under long-term contracts, providing greater price stability and reducing exposure to short-term market fluctuations. **In this context, regulatory stability is critical. It is essential that further disruption to the biomass sustainability criteria under Article 29 is avoided.**

The current Article 29 framework is already comprehensive and has been strengthened under RED III. The most recent revision tightened requirements across greenhouse gas savings and forest biomass sourcing, addressing previously identified gaps, including those highlighted in earlier Joint Research Centre analysis². **The framework is now among the most stringent biomass sustainability criteria globally**, ensuring positive outcomes for climate and biodiversity while avoiding carbon debt.

¹ Bioenergy Europe Landscape Report 2025

² JRC (2021) The use of woody biomass for energy production in the EU

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Furthermore, **REDIII is not yet fully implemented, and several Member States are late in transposing it.** Constant changes in bioenergy sustainability requirements, without any scrutiny of fossil fuel supply chains and without analysis of the current framework's impact, create a competitive disadvantage and **put energy security at risk.**

Reopening Art. 29, again, at this stage would introduce further uncertainty, particularly for key emerging uses, including SAF, marine fuels, energy-intensive industries, and biogenic carbon removals.

Avoid a Dogmatic Approach to the Cascading Principle and Recognise Local Realities

While biomass is a limited renewable resource that requires effective optimisation, its **potential remains currently untapped** and current global data support its long-term viability. By advancing the collection, sorting, and recovery of woody and agricultural residues, we can significantly improve supply chain logistics.

The **FAO Global Forest Resources Assessment 2025³** confirms that global forest resources remain substantial, totalling 4.14 billion hectares, with a declining rate of net forest loss. Furthermore, over 55% of the world's forests are now subject to long-term management plans. In Europe, this figure exceeds 90%, reflecting a profound commitment to sustainable forest management.

Wood fibre markets have evolved over decades into highly efficient systems that allocate material to its most appropriate end use. As a result, market-led cascading is already evident in key sourcing regions, where the absence of price distortion in low-grade fibre markets indicates that bioenergy demand is neither displacing material uses nor exerting additional pressure on fibre supply. These trends demonstrate that with robust sustainability safeguards in place, sustainably sourced biomass can remain available without compromising global forest integrity.

In this context, the cascading use principle should be applied in a way that preserves flexibility, reflects market realities, and supports efficient use of woody biomass. Ensuring cascading is applied in a manner that reflects differing forest and market conditions is particularly important.

A rigid or overly prescriptive application of cascading risks prevents this fibre from being mobilised in practice, despite the absence of competing higher-value uses. This would reduce revenues for forest owners, weaken incentives to retain land in forest use, and undermine the economic viability of forest management where alternative end markets are essential.

Academic literature has consistently highlighted the difficulty of translating cascading into operational policy⁴. Recent practical experience has further reinforced this, with many Member States still working to implement the rules in RED III. As a result, there is limited evidence of how cascading can be applied effectively across diverse forest systems and market conditions.

³ <https://openknowledge.fao.org/handle/20.500.14283/cd6709en>

⁴ For example: Olsson et al. (2018) Time to tear down the pyramids? A critique of cascading hierarchies as a policy tool and IEA Bioenergy (2016) Cascading of woody biomass: definitions, policies and effects on international trade

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This challenge has also been noted by the Joint Research Centre, which stated that previous discussions on cascading policies concluded that *"given the wide variety of situations across Member States, it was difficult to univocally define and meaningfully implement such restrictions in an EU legislation – the risk would have been to complicate compliance without necessarily fostering further sustainability or biodiversity conservation"*⁵. This underlines the need to avoid further prescriptive rules or guidance that attempt to codify a single approach across fundamentally different forest and market conditions.

The post-2030 framework **should avoid rigid cascading requirements and support a flexible, market-based allocation of biomass** that accounts for regional specificities, industrial structures, and optimal climate outcomes.

Promote Administrative Simplification and Better Harmonisation

To increase effectiveness and reduce the administrative burden on operators, the EU must harmonise overlapping legislation. Currently, operators struggle with conflicting definitions, parallel documentation requirements, and diverging verification systems. Aligning criteria, terminology, and documentation standards across the Renewable Energy Framework will reduce bureaucracy while improving compliance and transparency.

In this context, the **definition of Industrial Grade Roundwood (art.2) and its applications (art.3) duplicate the objective of the cascading use principle**. The definition excludes *"roundwood the characteristics of which...make it unsuitable for industrial use as defined and duly justified by Member States according to the relevant forest and market conditions"*. In doing so, it requires Member States to determine, based on market conditions, whether wood is suitable for higher-value material uses.

This **reflects the same underlying logic as the cascading principle**, also set out in Article 3, which requires Member States to design support schemes to avoid distorting competition in material use sectors. Both provisions pursue the same objective: that wood should be used by its higher economic and environmental value whenever possible.

Maintaining both provisions imposes overlapping requirements on Member States and supply chains, increasing complexity without delivering additional policy benefit. This creates unnecessary complexity that runs counter to the Commission's simplification objectives.

For this reason, **any reference to Industrial Grade Roundwood should be removed from the Renewable Energy Directive, as well as from any other subsequent legislation**.

⁵ JRC (2021) The use of woody biomass for energy production in the EU

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Keep A Systemic Approach for Energy Security

Considering the volatile geopolitical situation, the EU needs to increase installed renewable energy capacity and **build its energy independence on a reliable, homegrown, affordable, and fully decarbonised energy system.**

The phase-out of Russian gas and ongoing disruptions to global gas markets mean European energy prices remain volatile, driven by gas's role in setting marginal prices. For this reason, the post-2030 renewable energy framework will **require a more systemic approach.**

Reducing exposure to these dynamics and strengthening system resilience is crucial. Sustainable biomass can contribute to this by **providing renewable, dispatchable energy and diversifying supply away from volatile fossil fuels.**⁶ It can be sourced through established supply chains and contracted on a long-term basis, reducing exposure to short-term market fluctuations. By providing flexible generation, bioenergy can also influence the marginal supply of energy, limiting reliance on higher-cost fossil fuels⁷.

Undermining its role risks jeopardising the decarbonisation milestones already achieved, while increasing costs and compromising system reliability. The post-2030 framework must continue to **recognise sustainable biomass as a strategic enabler** of sector integration and a primary solution for decarbonising the EU energy system.

For more information, please contact Irene di Padua dipadua@bioenergyeurope.org

[Bioenergy Europe](#) is the voice of European bioenergy. It aims to develop a sustainable bioenergy market based on fair business conditions. Founded in 1990, Bioenergy Europe is a non-profit, Brussels-based international organisation bringing together associations and companies, as well as academia and research institutes from across Europe.

⁶ IEA Task 44 (2025) https://www.ieabioenergy.com/wp-content/uploads/2025/03/IEAB-Task-44_Flexible-bioenergy-policies-in-different-countries_Summary-report.pdf

⁷ Bioenergy Europe Biomass and Electrification. Executive Summary Handout (2025) <https://bioenergyeurope.org/wp-content/uploads/2026/04/Biomass-and-Electrification.pdf>