

## NGO position paper for RED Trilogues

# To protect nature, the climate and EU citizens' future, we must reform how bioenergy is treated in the EU's Renewable Energy Directive

Rainforest destruction through soya plantation in the state of Mato Grosso along the Highway 163.  
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Log yard and plant at Osula Graanul Invest pellet mill in Sõmerpalu, Võru County, Estonia, July 2019. Credit: Peg Putt.

This position paper calls on the Trilogue negotiators currently discussing the Renewable Energy Directive (RED) to revise this very important piece of legislation in a way that benefits EU citizens and protects, rather than damages, the EU's climate goals, food supplies, forests, nature and public health. **We call on EU policy-makers to ensure their response to the energy crisis does not aggravate the climate, food and biodiversity crises, and to avoid short term bioenergy-based "solutions" which would lock the EU's energy transition into a harmful long-term pathway.**

To be compatible with the European Green Deal ambitions, the EU's climate targets and what scientists are telling us,

**the revised RED must end public incentives for:**

- » burning forest biomass for energy, and
- » crop-based biofuels.



Looking at the positions of the three EU institutions and at what is now on the RED Trilogue negotiation table, we urge negotiators to:

## Forest biomass

- » **Stop support schemes for energy from primary woody biomass** (PWB - unprocessed wood taken directly from the forest): redirect these funds to help EU citizens afford their energy bills, and to support better forest management and cleaner renewables such as geothermal, solar and wind. Ref: EP text amending Article 29 paras 1, 6, 11.
- » **Support the EP's call to cap and phase down counting energy from primary woody biomass (PWB) towards EU renewable energy targets.** Set the cap at 2017 levels (the latest year of available data for the use of PWB), with a trajectory to stop counting PWB towards targets by 2027. Refs: EP text amending Article 29 paras 1, 6, 11; and Article 33.4(e)
- » **Ensure the definition of PWB is science-based** (such as the JRC's, the UN Biodiversity Convention's or the FAO's) **and without exemptions or loopholes**, so that it can be enforced and investors know what to expect. Ref: Article 2.2.22e 47ab.
- » **Establish the cascading principle via a delegated or at least an EU implementing act** to ensure comparable, strict application across the EU and produce more added value and carbon storage than with bioenergy in EU wood supply chains. Ref: EP text Art 3.3
- » **Exclude primary and old growth forests, as well as wetlands, from forest biomass sourcing areas** to ensure no RED biomass incentives reward burning wood coming from these areas rich in biodiversity and carbon. Ref: EP text Article 29.3, 29.4.

## Crop-based biofuels:

- » **Set a lower target for renewables in transport, to avoid incentivising the use of unsustainable fuels such as crop biofuels.** We advocate for a rapid phase out of all crop-based biofuels, the latest by 2030 and to set a lower GHG target for all transport, set at 8% and relying exclusively on advanced biofuels, RES-E and RFNBOs. The Council proposal of the GHG target is set at 13% and reflects the Commission's proposal, which is more realistic than the Parliament's position of 16%. Ref. EC proposal Article 25.1 (a)
- » **Rapidly phase out all crop-based biofuels and immediately phase out palm- and soy-based biofuels.** We recommend the Council to accept the Parliament's position on an immediate phase out of palm and soy oil. In parallel, it is necessary to deduct palm and soy's part from the food and feed cap and rapidly reduce the cap to zero, the latest by 2030. Ref. EP text Art. 26 par. 2.
- » **Ensure the cascading principle is applied for the use of advanced and waste based biofuels.** We strongly recommend returning to the previous target levels set by the RED for Part A and Part B of Annex IX and to keep the change proposed by the European Commission on Annex V to ensure the cascading principle is better respected. Ref. EC proposal text Annex V. (c)18

## General:

**Require the use of mixed waste sorting to remove fossil materials** to ensure that only energy from renewable non-fossil sources may be considered and supported as renewable. Ref: EP text Article 29.1,2.

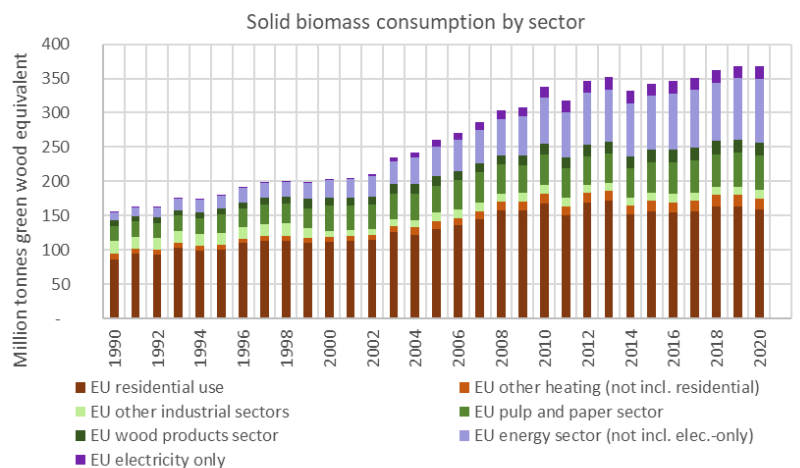
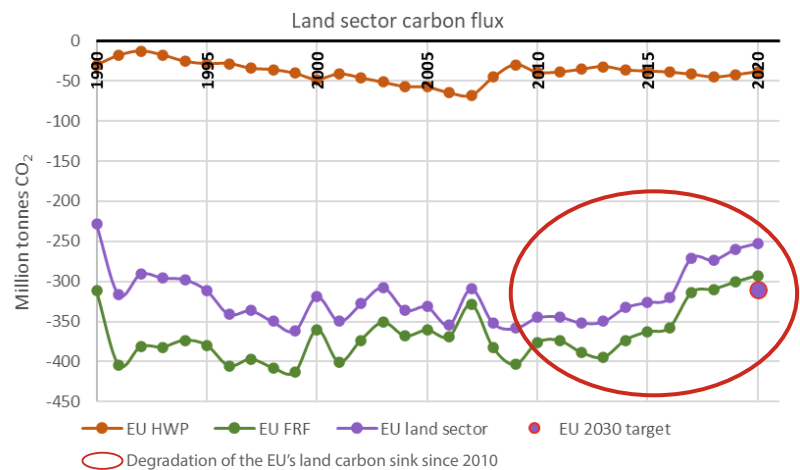
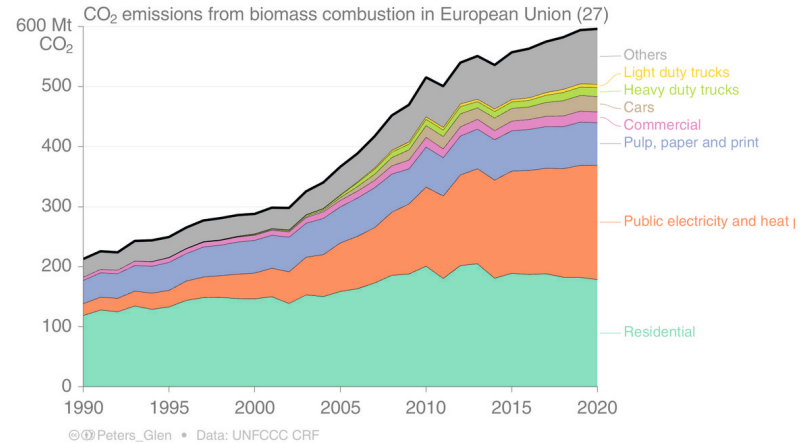
**RePowerEU (RED IV):** It is important to ensure that there are **no go-to areas for biomass**, whether combustion plants or sourcing areas, to guarantee all the normal environmental precautions apply to biomass projects. Such projects can be extremely problematic in climate and/or biodiversity terms and cannot be treated in the same way as things such as wind and solar.

Under current EU biomass incentives from the Renewable Energy Directive (RED), most Member States pay companies to burn wood and agricultural crops to produce energy, either directly via public subsidies or indirectly through other incentives such as exempting energy companies from buying carbon credits for their considerable CO<sub>2</sub> emissions. **This support for bioenergy cost society across the EU over €20 billion in 2018.** See [our previous position paper on RED biomass incentives](#) for more details on the damages they cause.

Yet these incentives under the RED to burn forest biomass and agricultural crops for energy are at the same time significantly harming the EU's climate goals, our health and our nature. **Encouraging energy companies to burn forests and crops during a climate crisis needs to stop.** These incentives damage forests in Europe and abroad, emit **enormous additional CO<sub>2</sub> emissions** (see graphs), cause **considerable air pollution**, and **undermine forests' ability to fulfill their functions as carbon sinks, air and water filters, and biodiversity hotspots.**

A reduction of crop-based biofuels has to be an important response to the unprecedented global food crisis that is pushing millions of people to the brink of starvation and many more into severe food poverty. Food prices, already high, skyrocketed in the wake of Russia's invasion of Ukraine. Record droughts across Europe and other parts of the world

will only add to the crisis. **It is therefore crucial to move away from burning crops for fuels and focus on cleaner alternatives, notably renewable electricity in electric vehicles for the road sector and green hydrogen and efuels to aviation and shipping where electrification is more challenging.**



Graphs Source: PFPI, November 2022, *Burning up the carbon sink: How the EU's forest biomass policy undermines climate mitigation, and how it can be reformed*, p. 25



# Signatory Organisations

1. Biofuelwatch (GB)
2. BirdLife Europe (EU)
3. Bond Beter Leefmilieu (NL)
4. Canopée (FR)
5. Comité Schone Lucht (NL)
6. Deutsche Umwelthilfe (DE)
7. Ei polteta tulevaisuutta - kampanja-Finland (FI)
8. Euronatur (EU)
9. Fern (EU)
10. FOCUS Association for Sustainable Development (SI)
11. Fridays for Future Estonia (EE)
12. Friends of Irish Environment (IE)
13. Green Impact (IT)
14. Green Squad (HR)
15. Green Transition Denmark (DK)
16. Instytut Spraw Obywatelskich (PL)
17. Leefmilieu (NL)
18. Luonto-Liitto (FI)
19. Mobilisation for the Environment (NL)
20. NABU (DE)
21. NATURAL RESOURCES DEFENSE COUNCIL (US)
22. Oxfam - International
23. PFPI (US)
24. Rainforest Foundation Norway (NO)
25. Robin Wood e.V. (DE)
26. Save Estonia's Forest (EE)
27. Stichting Natuurbelang Nederland (NL)
28. The Friends of Fertő lake Association (HU)
29. Transport & Environment (EU)
30. VšĮ Žiedinė ekonomika (LV)
31. WOLF Forest Protection Movement (SK)
32. ZERO - Associação Sistema terrestre Sustentável (PT)
33. Zero Waste Europe (EU)

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