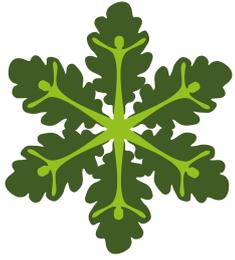




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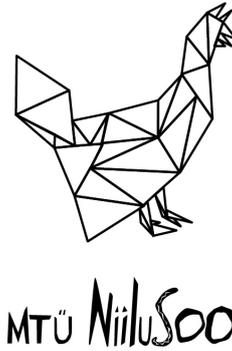
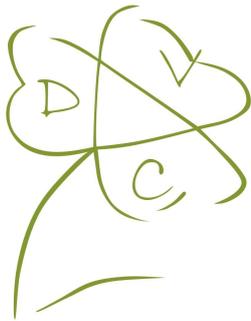
ROHELINE KOGUKOND
Estonian Green Community



EESTIMAA LOODUSE FOND



PÄÄSTAME
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Open Letter to EU Environment Commissioner Virginijus Sinkevičius Removal of forest biomass from the EU Renewable Energy Directive

1st July 2021

Virginijus Sinkevičius
EU Commissioner for Environment
via email: cab-sinkevicius-contact@ec.europa.eu

Dear Commissioner Sinkevičius,

We, environmental NGOs from Estonia, Finland, Latvia, Lithuania and Sweden, are contacting you in relation to the Commission's review of the Renewable Energy Directive (RED).

Being in the midst of a global biodiversity crisis, caused mainly by land and sea use changes including forest destruction and fragmentation, we are deeply concerned that the European Commission still includes the burning of forest biomass as 'renewable' energy in the RED. It is our strong view that current legislation, including so-called "sustainability" criteria entering into force this year, does not help to meet the EU's biodiversity and climate objectives for 2030 and 2050; it is actually working against them. Tragically, approximately half of the wood used in the EU is burned.

As the European Commission's own Joint Research Centre has warned, burning forest biomass has negative climate impacts because it emits carbon instantaneously, while forests need decades to centuries to regrow to offset emissions. We need to reduce CO₂ by at least 55% over the next 10 years. To accomplish this, it is essential that we massively increase the uptake of carbon in the land sector, particularly in our forests.

Logging for biomass which is burnt in Europe is harming forests in the EU and around the world including in Sweden, Finland, Estonia, Romania, Poland, Austria, Latvia, Lithuania, Russia, the Ukraine, the United States and Canada. This logging has devastating impacts on fragile wildlife and ecosystems.

Clear-cutting by pellet manufacturers in the EU is even occurring in reserves designed to protect forests and threatened species (e.g. European Union's Natura 2000 network). Between 2001 and 2019, Estonia's Natura 2000 network lost an area of around 15,000 hectares, due in part to biomass production¹.

Logging is also adding pressure to ancient forests which are critical for biodiversity conservation, supporting species that can not survive in managed forest landscapes. The Lithuanian government now allows logging in regional and national forest parks to meet biomass demand, despite their protected status².

Adding to the injury, wood burning is a major source of the air pollution that kills hundreds of thousands of EU citizens per year³.

¹ <https://elfond.ee/mets/euroopa-komisjon-algatas-rikkumismenetluse-raiete-tottu-kaitsealadel>

² <https://www.cutcarbonnotforests.org/wp-content/uploads/2021/03/uk-biomass-threatens-global-biodiversity-fs.pdf>

³ <https://forestdefenders.eu/wp-content/uploads/2021/05/FDA-air-pollution-factsheet.pdf>

Perversely, member states allocate billions of euro in subsidies every year to support the conversion of forests to fuel⁴.

The January 2021 JRC report⁵ found that only one out of the 24 scenarios of the use of forest biomass they evaluated poses a relatively low risk to biodiversity and the climate, and even then, this one scenario would mean emissions could be higher than fossil fuels for at least the next twenty years. All other scenarios lead to lose-lose pathways for biodiversity and/or the climate. A number of other scientific reports come to the same conclusion: burning forest biomass increases emissions compared to fossil fuels, while intensive harvesting for wood pellets and chips leaves forests bare of the biodiversity the EU wishes to protect. We therefore call on you to reform the EU's renewable energy policy by **excluding primary forest biomass from counting towards the EU's renewables target**. This would remove a main driver for forest destruction. This simple measure would benefit forest ecosystems across the EU and globally and do more to align the EU's climate achievements on paper with what the atmosphere actually "sees".

We are aware of the fact that the governments of Finland and Sweden in particular have expressed their reluctance to change the status quo. We would like to point out that their position - especially the letter sent to the Commission by Finnish and Swedish Prime Ministers in April 2021 - does not represent the views of local environmental NGOs nor their coalition partners.

The Swedish Minister of Climate and Environment, Mr Per Bolund, recently revealed a rift in the government view on forestry saying:

“As long as we do not reach the environmental goals for forests, I do not think it can be argued that Swedish forestry is sustainable.”

He also advocates “close to nature forestry” – the type of forestry the Prime Ministers have demanded to be removed from the EU Taxonomy.

The Finnish Minister for Environment Ms Krista Mikkonen has said that a letter from Prime Ministers to the EU “does not represent the Finnish position in a balanced way”.

In summary:

The EU's dependence on forest biomass as a fuel source is undermining its climate, biodiversity, and zero pollution goals.

The EU's forest ecosystems are in a very poor condition and viable species populations are being lost because forest habitats continue to be destroyed. The EU must log less forests and protect more. This means removing incentives and subsidies, like for forest biomass burning, that make things worse.

EU consumers are paying billions of euros in renewable energy subsidies each year to those who damage our forests, climate and air quality. In 2017 alone, citizens in 15 EU Member

⁴ <https://www.fern.org/fileadmin/uploads/fern/Documents/briefingnote%20burning%20biomass.pdf>

⁵ Camia, A., et al. 2021. The use of woody biomass for energy production in the EU, EUR 30548 EN. A version that highlights some of the key results is found [here](#). A civil society summary of the report is found [here](#).

States paid out over €6.5 billion in subsidies to burning wood for energy, and the total EU-wide figure is much higher. These precious public funds must be directed towards true low-emission technologies, also to promoting energy savings and improving energy efficiency.

Removal of forest biomass from the RED does not mean all wood burning wood will end. It simply means that burning primary forest biomass should not contribute to renewable energy targets nor should public funds be used to incentivise it.

Mr Sinkevičius, please listen to the scientists, and put forests and climate first. Resist the pressure of a minority group of companies and lobbyists who are undermining EU policy. Please remove forest biomass from the Renewable Energy Directive.

We thank you for listening to us and would welcome a dialogue with you.

Sincerely,

Amazon Watch Sverige, Sweden

Baltijos aplinkos forumas (Baltic Environmental Forum), Lithuania

Darnaus vystymosi centras (Centre for Sustainable Development), Lithuania

Eestimaa Looduse Fond (Estonian Fund for Nature), Estonia

Eesti Metsa Abiks (Estonian Forest Aid), Estonia

Eesti Roheline Liikumine (Estonian Green Movement), Estonia

Fridays For Future Sweden, Sweden

Gyvo žalio, Lithuania

Hiite Maja (House of Groves Foundation), Estonia

Keskkonnaõiguse Keskus (Estonian Environmental Law Center), Estonia

Keskkonnateabe Ühendus (Foundation for Environmental Information), Estonia

Klimataktion, Sweden

Labanoro klubas (Club Labanoras), Lithuania

Latvijas ornitoloģijas biedrība (BirdLife Latvia), Latvia

Lietuvos ornitologų draugija (Lithuanian ornithological society), Lithuania

Lietuvos žaliųjų judėjimas (Lithuanian Green Movement), Lithuania

Luontoliitto (Finnish Nature League), Finland

Natur och Miljö (Finnish Society for Nature and Environment), Finland

Nature and Youth Sweden, Sweden

Niilusoo MTÜ, Estonia

Nätverket Stoppa Preemraff, Sweden

Päästame Eesti Metsad MTÜ (Save Estonia's Forests), Estonia

Püsimetsaühistu (Continuous Cover Forest Association), Estonia

Rannamänniku Kaitseks MTÜ, Estonia

Roheline Kogukond (Estonian Green Community), Estonia

Skiftet, Sweden

Skydda Skogen (Protect the Forest), Sweden

The Swedish Climate Parliament, Sweden