



To the attention of:

Executive Vice-President Frans Timmermans, Commissioner Janusz Wojciechowski, Commissioner Virginijus Sinkevičius, Commissioner Kadri Simson

Heads of Cabinets of Executive Vice-President Frans Timmermans, Commissioner Janusz Wojciechowski, Commissioner Virginijus Sinkevičius, Commissioner Kadri Simson

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Subject: EU 2030 biodiversity framework: Bioenergy sector

We, the signatories, represent sectors of importance for the European Green Deal. The EU bioenergy value chain provides for 700 000 jobs and generates an annual turnover of € 60.6 billion. With around 50,000 business units, our sector is solidly based in the EU. Bioenergy provides the largest share of renewable energy¹ to buildings, power, industry and transport, achieving considerable GHG emissions savings from agriculture and other sectors of the EU economy.

Our industry is fully committed to responsible sourcing of biomass and other sustainable renewable feedstock, respecting legality of harvesting operations, improving GHG-reduction performance, supporting adequate forest regeneration and preferring management operations that minimise the impact on biodiversity including minimum tillage, crop rotation, organic fertilization.

We believe that the health of our environment and preservation of biodiversity is of utmost importance in facing climate change and, at the same time in being able to count on sustainable – resources. A coherent policy framework enables growing renewable energy shares to achieve the necessary GHG emissions savings while integrating biodiversity maintenance considerations.

As representatives of the EU's largest renewable energy sector, we strongly believe that the following important aspects must be considered when setting further energy-related policy objectives within the EU biodiversity framework by 2030:

1. Sustainable bioenergy is a win-win solution for energy generation

Bioenergy is a readily available source of energy and green growth. It diversifies farmers' and foresters' income creating local added value. It also enables investments to develop innovation, improve sustainability performance, and adopt environment-friendly practices.

The National Energy and Climate plans from Member States rely on bioenergy for the achievement of their climate and energy targets.²

¹ Bioenergy represented 58.6% of renewable gross final energy consumption in the EU28 in 2017 (Eurostat, 2019)

² Deploying bioenergy with carbon capture and storage (BECCS) solutions will ensure greater GHG emission savings, making bioenergy a carbon negative energy source.

2. Sustainable feedstock use should not be minimised

The transformative approach for bioenergy referred to in the leaked biodiversity strategy calls for minimising the use of certain feedstock categories, such as food and feed crops and whole trees.

But the former is an over-simplification in the case of European biofuels, as: 1) only a small percentage of EU utilised arable land is used for biofuel production that creates both fuel and feed and other valuable biomaterials; and 2) as the Commission confirms regularly in its Renewable Energy Progress Reports, European biofuels production is sustainable and its impact on food prices is negligible. When farmers apply sequential cropping and crop rotations, local biodiversity is protected compared to mono-cropping systems. Maize, triticale, wheat, or ryegrass silage can all be produced as sequential crops in regimes of crop rotation. They are grown as an additional (second) crop before or after the harvest of the main crop on the same agricultural land. More plants on the field also increase the natural photosynthesis activity and CO₂ removal from the atmosphere. Enriching the soil with carbon enhances soil quality, health, and fertility to grow more nutritious food.

The latter (whole trees) is an arbitrary definition: a restriction over use of feedstock categories would not foster further sustainability or biodiversity conservation but would only complicate compliance. Wood market prices guarantee an efficient allocation of forest resources: the bioenergy sector purchases what is left by other sectors, including low-value and otherwise unmarketable thinnings (whole trees). High-quality wood, being unaffordable for the bioenergy sector, is used for high-value products such as buildings and furniture.

3. Ensure legal certainty and long-term perspective

The Renewable Energy Directive recast sustainability framework will be applicable after Member States have implemented it, by July 2021. This includes requirements taking into consideration biodiversity maintenance. Evoking possible review of these criteria before their implementation throws an important economic sector into uncertainty.

We call on the European Commission to shape the future biodiversity policy within realistic, yet ambitious objectives, and to acknowledge the current Renewable Energy Directive as the reference framework to address all aspects of bioenergy sustainability and ensure strengthened requirements apply to both domestic and imported feedstock.

Yours sincerely,

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