



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR ENERGY

Directorate C - Green Transition and Energy System Integration  
C.2 - Decarbonisation and Sustainability of Energy Sources

Brussels, 21 January 2022  
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Dear Petitioners,

We understand your concern that there is an increased pressure on our forests. Climate change continues to negatively affect European forests, particularly but not only in areas with mono-specific and even-aged forest stands. It has also brought to light previously hidden vulnerabilities, aggravating other destructive pressures, such as pests, pollution and diseases, just as it influences the occurrence of forest fires. At the same time, demand for wood from our forests is increasing for all uses, from timber for construction, to bioenergy.

To ensure meeting the multiple objectives of protecting biodiversity, mitigating climate change and providing renewable energy, the Commission has proposed a set of interlinked policies within the European Green Deal, aimed at minimising negative impacts on biodiversity, improving forest health, increasing the forest carbon sink, while providing a sustainable supply of raw materials for our society.

With the proposal to revise the Renewable Energy Directive, we aim for a balance between addressing the broader biodiversity and climate ambition of the European Green Deal, while providing regulatory stability to foster sustainable bioenergy.

Nearly 60% of renewable energy in the EU is bioenergy. For some Member States, increasing ambition in renewable energy targets may not be feasible without the use of bioenergy. At the same time, forest biomass must be harvested in a sustainable way. Taking this into account, the Commission proposal for the revision of the Renewable Energy Directive includes strengthened sustainability criteria so that bioenergy from forest biomass is possible, while minimising negative impacts to biodiversity and to the long-term productivity of the forest. For example, biomass from large clear cuts, veneer logs and stumps and roots are excluded from what can be supported or used for renewable energy targets. Furthermore, primary forests should not be degraded or converted into plantations.

A recent analysis of our Joint Research Centre has classified these as lose-lose measures from the perspective of climate change mitigation and biodiversity protection. The same study identified two win-win measures. One of these measures is the addition of new forests or even the introduction of trees into agricultural systems (agro-forestry) to increase the amount of biomass available for bioenergy outside of the existing forests. The other is the use of waste and residues from forestry operations, which have no other economic use, provided an appropriate amount of deadwood remains for soil quality and habitat.

Further wastes and residues along the wood product value chain, for example as a by-product of making boards in a sawmill, also make up a large part of the biomass that is used for energy purposes. However, to minimise the risk of market distortions which could result in whole trees or quality round wood being used for energy, we have also proposed a requirement to implement the cascading principle.

Under the cascading principle, woody biomass is used according to its highest economic and environmental added value, including wood-based products, re-use, recycling, energy recovery and disposal. Where no other use for woody biomass is economically viable or environmentally appropriate, energy recovery helps to reduce energy generation from non-renewable sources and, depending on local circumstances, it may be the only option available for economic operators (e.g. forest owners).

In our view, our proposal for the revision of the Renewable Energy Directive addresses these very important concerns while enabling forest biomass to contribute to renewable energy targets.

Your faithfully,

*Electronically signed*

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Head of Unit