

From: CHAPUIS Laure (CAB-SIMSON)
Sent: lundi 8 mars 2021 15:35
To: CAB SIMSON ARCHIVES; [REDACTED] (CAB-SIMSON)
Subject: Fwd: Biomass external costs / revision Energy Taxation Directive
Attachments: image003.jpg; Fern note_Biomass ETD.pdf

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Begin forwarded message:

From: [REDACTED] <[REDACTED]@fern.org>
Date: 8 March 2021 at 10:31:00 CET
To: "NYITRAI Kitty (CAB-SIMSON)" <Kitti.NYITRAI@ec.europa.eu>, "CHAPUIS Laure (CAB-SIMSON)" <Laure.CHAPUIS@ec.europa.eu>
Cc: [REDACTED] <[REDACTED]@fern.org>
Subject: Biomass external costs / revision Energy Taxation Directive

Dear Ms. Nyitrai, Dear Laure,

I hope this finds you well.

I am contacting you regarding the revision of the Energy Taxation Directive, and our recommendations to better price in the external costs from biomass (wood) burning.

Fern is an environmental organisations working for better EU policies to protect forests. Fern's climate team has predominantly focused on strengthening the LULUCF Regulation and sustainability criteria on biomass use in the Renewable Energy Directive (REDII).

Wood burning in the EU has been growing rapidly and now represents around 40 per cent of the EU's renewable energy mix. This is leading to a variety of negative impacts and associated costs – related to greenhouse gas emissions, air pollution, biodiversity loss and resource depletion. Recent reports have confirmed that its external costs are significantly higher than those from other renewables or even from fossil fuels (Trinomics, 2020). The EU's broader policy framework (EU ETS, REDII, LULUCF, et al) however does not effectively mitigate those negative impacts / costs, does not 'price them in' or takes them into consideration for state aid assessments (see my working paper on State aid rules and biomass, [EUI Cadmus \(2020\)](#)).

While we believe the EU should urgently address this issue through the REDII by radically restricting the use of primary biomass and specific end uses (notably power-only), we also believe there is a need to better price in external costs from remaining bioenergy use. Please find a note for discussion attached to this e-mail.

These are my final weeks at Fern, but in case of interest, I happily remain available for a meeting on this still in March, at your earliest convenience.

Best regards,

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Forest & climate campaigner

■■■■ [@fern.org](mailto:■■■■@fern.org)