



21<sup>st</sup> June 2012

Dear Commissioner Oettinger,

### **Robust sustainability standards for biomass are urgently needed**

Europe plans to produce over half of its renewable energy from bioenergy by 2020, which is over 10% of the total energy consumption. While we fully support Europe's 20% renewable energy target and the need to move away from fossil energy sources, there are alarming risks associated with the significant increase of biomass for energy use.

**Energy from biomass fails to guarantee genuine reductions in greenhouse gas emissions.** During combustion, burning biomass releases as much CO<sub>2</sub> as burning fossil fuels and it is neither legitimate nor realistic to assume that these emissions will be promptly re-absorbed by vegetation. The delay between emission and re-absorption can take decades or centuries, depending on the type of biomass. This is inconsistent with the urgency of reducing emissions to mitigate climate change and the targets set internationally and at EU level.

The current assumption that smokestack emissions from biomass for energy are zero is incorrect. The Commission's recent proposal for LULUCF emissions attempts to account for the carbon released by this sector, but it does not deal with the inflated reference levels declared by some countries, nor does it cover countries from outside the EU, from where for example over 80% of UK biomass is expected to be imported. New biomass sustainability standards must acknowledge all the GHG impacts from burning biomass including combustion emissions and the delay between emission and re-absorption (so-called 'carbon debt').

**The unregulated dash for biomass threatens to worsen forest degradation and biodiversity loss,** posing a significant risk to endangered species, habitats, ecosystems and their services.

It is shocking that current laws (the EU Renewable Energy Directive and ETS Directive) promote the use of biomass for energy without providing any European safeguards. While some member states have national sustainability standards these are neither consistent nor comprehensive enough. Furthermore, verification and enforcement is weak. Thus incredibly, it is possible for EU countries to harvest and use biomass that has negative impacts on biodiversity and the climate and call it renewable low carbon energy.

In the attached joint briefing, we set out our concerns in more detail and urge you to take action to ensure that Europe's use of bioenergy results in real emission reductions and does not threaten forests and other ecosystems. Failure to do so risks destroying the credibility of European renewable energy policy.

We believe that if our concerns are addressed, biomass can make a vital contribution to renewable energy targets. We want to avert a paralysis in the biomass industry resembling that being experienced by the biofuels sector over the deadlock on including emissions from indirect land use change (ILUC).

We look to the Commission to urgently ensure that the right framework is in place. We would be grateful for the opportunity to discuss this issue with you in person, and look forward to hearing from you.

Yours Sincerely,

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████████████████████, Greenpeace European Unit

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