



**To:**

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Executive Vice-President for the European Green Deal

**Kadri Simson**

Commissioner for Energy

**Janusz Wojciechowski**

Commissioner for Agriculture and Rural Development

**Virginijus Sinkevičius**

Commissioner for Environment, Oceans and Fisheries

Brussels, 26 April 2021

**Subject: Key points from forest owners and managers on current discussions on bioenergy**

**Dear Vice-President, Dear Commissioners,**

We would like to bring to your attention some key facts on sustainable forest management and bioenergy from the point of view of forest owners and managers.

We are convinced that the Green Deal's objective of climate neutrality by 2050 can only be reached through close cooperation with forest owners and managers, using their wide experience in sustainable forest management. We are concerned that our know-how and expertise in sustainable forest management are not being sufficiently taken into account in the revision process of Renewable Energy Directive (REDII). Therefore, we would like to provide our insights with an aim to avoid contradictory legislation being enacted in the future.

**Revisions to RED II on the promotion of the use of energy from renewable sources**

Forest biomass is by far the most important Renewable Energy Source (RES) in the EU. All Member States who have been forerunners over the past decades in using woody biomass to fulfill the RED targets regarding the share of RES (SE, FI, LV, AT, ES) have simultaneously succeeded in increasing their forest area, the growing stock of their forests and the use of wood for products as well as energy.

Unfortunately, the ongoing debate to revise RED II ignores these success stories and, instead of simply adjusting the overall level of ambition by increasing the targets, is moving in an unrealistic manner to tighten the rules regarding the use of forest biomass. This is illustrated by the discussion on the possible imposition of an arbitrary threshold for roundwood used for bioenergy, which fails to answer the overall question of how to source wood sustainably.

The forest biomass sustainability criteria in RED II should only rely on the enforcement and monitoring of forest and nature-related legislation in the Member States. Supporting Member States in the effective implementation of their legislation should lead to success in ensuring biomass sustainability at national and local levels.

### **Forest management**

Sustainable Forest Management has been implemented as a multifunctional approach delivering benefits ranging from wood production to a variety of ecosystem services. While continuing to grow high-quality timber for construction, furniture, etc., forest managers have had to improve the resilience of their forest stands, especially in the face of changing climate conditions. In many European regions, forestry operations are not only necessary to ensure the production of high-quality wood but also to avoid the over-accumulation of biomass in forests, which can increase the risk of forest fires in dry areas, insect calamities, storm damage, etc.

Forest owners and managers' income is principally derived from the sale of high-quality timber assortments used for long life cycle wood products. The main purpose of European forests is not to deliver wood for bioenergy even though, during the early phases of forest growth, selling wood for bioenergy after thinning can provide some financing for management operations. Rather, pre-commercial and early thinnings are crucial to increase the stability and resilience of forest stands and provide trees with room to grow straight and tall. Tending operations generate wood qualities suitable for uses such as boards, panels, paper and cardboard, as well as energy.

The forest life cycle is long. Receiving an income for high-quality wood can take up to 70-100 years after forest regeneration takes place and thinnings, especially during the early phases of growth, generate costs. The quality of the wood resulting from tending operations, the market demand, the vicinity of production facilities to the forest holding, and the existence of outlets for bioenergy use are all important factors that can have an impact on the financial means which become available to undertake forest management operations.



*Figure 1 The pile on the right has been collected from the site on the left to allow the standing trees more space to grow. At the same time removing the smaller trees prevents the accumulation of dry material prone for fires. Picture Sylvain Gaudin CNPF.*

### Uses for different quality wood

Various wood and forest biomass qualities for multiple end-uses are derived from the same forest stand and, often, even from different parts of a single tree. High-quality wood with straight stems is reserved for sawn goods, whereas the wood destined for the pulp and paper industries cannot be rotten or include color defects. Certain parameters are visible during harvesting. Others are inside the tree and become visible only after felling or, in some cases, only during processing at the factory. For these reasons, in many cases large diameter logs of low quality are suitable for bioenergy.

In conclusion, the diameter of a log is only one among several criteria used to assess which use or manufacturing process the wood should be used for. The foremost determining factor is the quality of a stem. This means that large-diameter harvested wood resulting from regular forest management (including salvage logging after natural disturbances) can find a suitable outlet in bioenergy because of its low quality.



*Figure 2 Example of a good quality spruce log which can be used for sawn goods. Picture Sylvain Ougier CNPF*



*Figure 3 Spruce log with discoloration made by a fungus. Due to visual defects this log is not suitable for sawn goods or pulp. Picture by Patrick Lindenbjär.*

### On setting a threshold diameter or cap on roundwood used for bioenergy

The argument of using a metric (a diameter or volume) to safeguard sustainability lacks justification when considering the RED II sustainability criteria. RED II already covers the requirements of forest biomass sustainability such as legality, regeneration, nature protection, soil and biodiversity maintenance and long-term production capacity of forests. It must be noted that these kinds of rules are unique to the renewable bioenergy sector and by proposing to change these rules before even implementing them, the Commission risks putting its competence into question on these issues.

Furthermore, setting a potential threshold diameter or cap on wood for bioenergy would result in unnecessary additional administrative costs. There are situations, such as salvage loggings or lack of market demand or processing industries in the vicinity of the forest, which make bioenergy the most affordable option for the forest owner. A threshold diameter or cap would then leave forest owners

and managers without the possibility to gain income from their investment in order to continue managing their forests in the long run.

### **The terminology “whole tree”**

Finally, there is a misunderstanding of “whole tree concept” which is used by the EU biodiversity strategy.

Whole tree harvesting is often misinterpreted as harvesting of the roots and the stem wood. When harvesting in European forests, an average of 50 % of woody biomass is left in or on the ground, in the form of stumps, roots, and branch tops, to ensure the nutrient cycle of the forest soil.

### **To conclude**

As you notice from this note, the forest value chain is very complicated. We remain available to meet with you to directly exchange our insights on the sector. We would very much welcome a meeting with you.

### **Visualizing the different qualities and sizes**



*Figure 4 Harvesting in a spruce stand in Austria provided wide diameter range of poor quality wood. The best outlet for this pile is bioenergy. Leaving this quantity of spruce logs in the forest would create a high risk of bark beetle infestation. Bark beetles use dead and dying spruce trees as propagating material. Picture Martin Höbarth.*



*Figure 5 This large diameter spruce stem log has been infected by rot making it unusable for both sawn good or pulp. Picture Martin Höbarth.*



*Figure 3 This large diameter oak log is rotten and curved. The rotten parts cannot be used for sawn goods and oak is not a suitable raw material for pulp. This rot is only detectable after felling. The curve of the stem makes it difficult to use it for sawn goods. Picture Luc Bouvarel.*



Figure 4 Example of a good quality oak log: straight and without defects. Picture Mael Grauer CNPF.

Yours sincerely,

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