



Comment on Revision of the Guidelines on State aid for Environmental protection and Energy 2014-2020 (EEAG)

There are serious [mismatches](#) between science and EU's policy on forest bioenergy. Energy from burning biomass is subsidized in the EU which puts a big pressure on forests in the EU and in the world. Bioenergy is not carbon-neutral. The burning of bioenergy emits carbon dioxide immediately which contributes to the greenhouse effect just like fossil fuels. It takes many years to compensate for these carbon emissions: in a [50-100 year perspective](#), bioenergy can even have larger climate impact than fossil fuels partly due to lower energy density.

[More than 100% of Europe's annual harvest of wood](#) would be needed to supply just 1/3 of the expanded Renewable Energy Directive (RED). The increased demand for biomass leads to [biodiversity degradation](#) worldwide, and has also been linked with [illegal logging](#) in the EU.

The burning of wood also leads to air pollution and emission of fine particles such as NO_x, PM₁₀ and VOC) which are [toxic](#) for human health. Air pollution kills around [500,000 people](#) in the EU every year.

Everything possible should be done to [prevent carbon dioxide](#) from entering the atmosphere. The purported climate benefits of bioenergy need to be re-evaluated urgently and the use of both bioenergy and fossil fuels must be reduced.

The [European Academies' Science Advisory Council](#) (EASAC) has called for international action to restrict climate-damaging forest bioenergy schemes. Subsidies and other incentives for burning forest wood need to end and energy generated from burning forest wood needs to be excluded from RED. Also, forests should not be used as carbon offsets to compensate for fossil fuel emissions.

Replacing natural forests with plantations and harvested wood products to create sinks is not positive for mitigating climate change as it fails to account for the [carbon lost from the destroyed natural forest](#) and when [wood is used for energy](#). The older the forest is, the more carbon it contains, both in the soil and trees. Old-growth boreal forests aged up to [800-5000 years](#) can still continue to function as carbon sinks and do generally contain more below-ground carbon than younger forests.

By decreasing harvest rates and protecting older natural forests, carbon will continue to be absorbed and stored in the soil. Emissions from forest harvesting are not fully accounted for by the EU. Instead, harvested wood products (HWP), which include paper products and wood used for energy, are considered as carbon dioxide removals. According to a study ([Harmon, 2019](#)), the projected long-term mitigation benefits related to product substitution by wood may have been overestimated 2- to 100-fold. Most of the produced forest products, such as paper and bioenergy, are [short-lived](#). Only a small fraction ends up in long-lived products such as timber.

The EU should end its funding and support for monocultures and even-aged tree plantations, which are poor of species, instead of favoring natural regeneration. Monoculture tree plantations degrade the biodiversity. Also, there is a general pattern of [decreasing carbon pools](#) in tree plantations as compared to natural forests. The management regimes should be altered and natural species should be allowed to grow back naturally.

The support of biomass leads to [market distortions](#) since the aid granted to biomass is not used for the development of cleaner renewable alternatives. There is also a high risk of conversion of coal plants to run on biomass.

The Commission must align the current EEAG to the EU climate ambition and the 2050 climate neutrality objective by the following:

- 1) Do not define forest biomass as renewable source;
- 2) Prohibit operating aid to forest biomass and allow aid only to 'true' renewable energy sources such as solar;
- 3) Restrict aid to conversions from coal to biomass plants and operation of biomass installations;

Aid should be used to protect all high conservation value forests in order to favor natural carbon sinks and the biodiversity, to favor continuous cover forestry in forests without high conservation values and to reduce the overconsumption of all resources.

External costs for environment, climate and biodiversity and potential distortive market effects of the biomass support (especially considering the 2050 climate neutrality objective) need to be controlled. The monitoring of the various supports to biomass based on different instruments need to increase in order to avoid distortion on the renewable energy market.

Maintain the prohibition of operating aid to food-based biofuels for environmental and climate purposes.