



2 May, 2019

European Commission
 Rue de la Loi / Wetstraat 200
 1049 Brussels

Concerns: Analysis shows critical compliance gaps in draft NECPs; NGOs urge Commission to ensure transparency on bioenergy production and land impacts

Dear directors Hans Van Steen and Artur Runge-Metzger,

CC: Cristina Lobillo Borrero, Pierre Schellekens & Miguel Sagredo

We are writing because we are aware that your services are currently reviewing the draft National Energy and Climate Plans (NECPs) submitted by Member States, with a view to providing feedback on how they should be improved.

We, the undersigned groups, have also examined the draft plans and on behalf of our millions of members and supporters in Europe and North America, **we call your attention to significant deficiencies in their treatment of bioenergy. With this letter, we urge you to insist that Member States remedy these deficiencies.** Failure to do so risks the EU lending support to bioenergy with serious unintended impacts on the climate and the natural environment.

To stop bioenergy from increasing EU greenhouse gas (GHG) emissions and degrading the world's forests, it is critical that Member States are transparent about a) the share of their total renewable energy commitments met via reliance on bioenergy; b) the type and origin of biomass relied upon in their plans; and (c) the climate and environmental impact of bioenergy policies. We call upon you to ensure that EU Member States fulfill the requirements of the Governance Regulation (EU 2018/1999) in regard to bioenergy in their NECPs.

These requirements provide that NECPs shall include:

- “Estimated trajectories on bioenergy demand, disaggregated between heat, electricity and transport, and on biomass supply by feedstocks and origin (distinguishing between domestic production and imports).” (2.1.2. iv. Renewable energy)
- “For forest biomass, an assessment of its source and impact on the LULUCF [Land Use, Land Use Change and Forestry] sink”. (2.1.2. iv. Renewable energy)
- “Impacts of planned policies and measures described in section 3 on energy system and GHG emissions and removals, including comparison to projections with existing policies and measures (as described in section 4).
 - i. Projections of the development of the energy system and GHG emissions and removals as well as, where relevant of emissions of air pollutants in accordance with Directive (EU) 2016/2284 under the planned policies and measures at least until ten years after the period covered by the plan (including for the last year of the period covered by the plan), including relevant Union policies and measures.”(5.1 Impact Assessment)

Unfortunately, our review of the draft NECPs shows **that there are significant gaps in Member States’ compliance with these requirements:**

- Only half the NECPs (14) provide any trajectory on planned bioenergy use in the period until 2030; none of the NECPs provide comprehensive information on the type and origin of biomass feedstocks, such as reliance on biomass imports and crop based biofuels.
- Few Member States provide a comprehensive assessment of their domestic forest biomass supply (expressed as logging/harvesting by type of wood) and the impact of that specific activity on the LULUCF sink.
- None of the NECPs provide the required impacts assessment of policies supporting bioenergy to assess the real GHG emissions and air pollution impacts.
- Not all NECPs have a placeholder to provide information on the Forest Management Reference Level (FMRL), which forms the basis of Member States’ calculations of both wood harvests and the overall climate impact of LULUCF.
- None of the NECPs outline future policies and their impact on GHG emissions and removals as compared to current policies.

These omissions in the draft NECPs are especially concerning as most of the Member States that do provide information on trajectories for bioenergy show a planned increase of *at least* 30 per cent in the period until 2030.

Today, bioenergy already provides around 65 per cent of the EU’s renewable energy mix. EU demand for biomass has led to bioenergy production with well-known and well-documented negative impacts on the climate and critical ecosystems, such as the use of palm oil (and other crops) for biofuels production and the use of wood pellets from whole-tree harvesting. There is now scientific consensus that certain forms of bioenergy lead to an increase in greenhouse-gas emissions.

To ensure that Member States avoid reliance on high-risk biomass sources and support only volumes and types of bioenergy that genuinely advance the EU's climate and renewable energy agenda, **we urge the Commission to insist that Member States provide all the required information on bioenergy use, such as detailed information on bioenergy trajectories, feedstock types and origin, as well as an impact assessment of supporting policies.** The Commission should also ensure that plans are in compliance with the sectorial legislation, such as the relevant provisions in the Renewable Energy Directive.

Transparent planning and reporting on the use of biomass for energy is crucial if the EU is to understand and avoid the negative impacts of bioenergy on land use, forests and the climate. We need to have a better picture of all national policies and incentive frameworks that may affect forests and the climate.

Yours sincerely,

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