

Roadmap: Revision of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources

The Confederation of European Forest Owners (CEPF) welcomes the EC initiative to possibly review the EU renewable energy rules in order to contribute to higher climate ambition as part of the European Green Deal and in support to the objectives of the EU Climate Law and 2030 Climate Target Plan. We do want to note some remarks and concerns regarding the content of the options described in the inception impact assessment and their possible impacts on the use of forest-based renewable energy.

The production and use of renewable forest-based energy have important local and regional level impacts in the recovery of the rural areas after the COVID-19, economically as well as socially. 88 % of bioenergy plants are small and medium scale plants located across EU.

We support the option to explore the possibility for a higher target in share of renewable energy consumption. All forms of renewable energy sources should contribute to the 2050 EU climate ambitions and should be supported. Climate Target 2050 cannot be reached without phasing out fossil fuels. The energy derived from biomass answers today to almost 60 % out of the total renewable energy production in EU and projections show that bioenergy will contribute to the achievement of the the EU 2050 climate neutrality objective.

Regarding the Option 4 we do not find it reasonable to amend the articles 29-31 in the REDII at this point of policy development. The implementing guidelines for REDII are almost finalized and the implementation of the REDII is just beginning. Possible amendments of these rules should only be considered after the implementation of the current regulation has been in place and evaluation results are available. We also emphasize the importance of stable policy environment in order to engage the stakeholders in implementation.

Regarding the sentence: "The risk of unintended incentives for using unsustainable biomass will be assessed and minimised through appropriate safeguards.", the terminology "unsustainable biomass" is worth being clarified. The REDII regulation and its articles 29-31 are especially developed to ensure that the biomass used for energy purposes is sustainable. Also, as indicated above, CEPF is of the views that this regulatory system should be implemented before considering possible changes.

Lastly, CEPF would like to remind that bioenergy developments can support forest owners in sustainably managing their forests through providing them an opportunity to get a revenue from management operations on co-products or low-quality wood. These management operations are essential to produce high value timber. EU policy framework stability and predictability regarding bioenergy developments is therefore important for the forest-based sector as a whole.

