

June 4, 2018

Re: Final Negotiations on Renewable Energy Directive

To Members of the European Parliament,

This past January, we and other scientists wrote to you and your fellow MEPs warning that the expansive eligibility for forest biomass in the EU's Renewable Energy Directive would likely lead to increases in greenhouse gas emissions for decades, quite plausibly lead to an additional harvest of wood equal to all of Europe's present harvest, and seriously threaten European and global forests. Nearly 800 scientists signed the letter, including many IPCC lead authors and winners of the Nobel Prize and US Medal of Science.

Last week, the research agency of the UK Government's Forestry Commission published a report, which similarly warned that "unless appropriate policy measures are taken" that are not present in the directive, "a significant increase in bioenergy use in the EU is likely to lead to a net increase, rather than decrease, in GHG emissions being contributed from bioenergy sources." This report should be significant for EU deliberations because the European Commission commissioned and claimed to rely heavily on work by this same research group when preparing the directive.

The directive now includes no significant criteria on greenhouse gas emissions for eligible biomass. The greenhouse gas criteria only cover the emissions from fossil fuel use and some trace gases involved in the supply chain, such as those involved in running harvesting or pelleting machines, and do not include the emissions from burning biomass or any reductions of carbon stored in the forest. This approach is equivalent to estimating the emissions from coal by counting emissions from coal-mining machinery but not from burning the coal itself. Language about sustainable forest management is largely irrelevant to the climate impact of forest biomass use over many decades. So too is the provision requiring that countries account for emissions from the land use sector. Even a much more strongly written requirement than that in the directive would have no serious effect because it would not alter the incentive the directive gives to power plants and others to import wood from another country even when doing so increases net emissions for decades. At best, the Renewable Energy Directive is creating a requirement that European energy users subsidize activity that increases carbon in the atmosphere by decreasing carbon in forests in the hope that other countries might pay more money to mitigate those increases somewhere in their economies.

Although the Parliament rejected an amendment to restrict forest biomass to residues and wastes, other provisions if preserved and strengthened could potentially limit some of the damage, and we urge you to include them. They are:

- A provision prohibiting Member States from financially rewarding the use of biomass that has other markets.
- Restrictions on the efficiency of plants burning biomass fuels, which would reduce not merely the quantity of biomass but hold down the efficiency penalty of burning biomass instead of fossil fuels.
- The option for Member States to impose more stringent criteria for forest biomass at national level.

- A commitment to review the sustainability criteria for forest biomass at an early stage – for example in 2023 as proposed by the Commission and endorsed by the Parliament. Not to revisit this policy given the scientific warnings would be an egregious disregard of science, particularly given the risk that other countries around the world may well decide to copy the EU’s approach to forest biomass.

We urge you to insist in your negotiations with the Council and Commission on strong versions of these provisions in the final Renewable Energy Directive. We are copying this letter to those institutions so that they are also aware of our concerns.

Sincerely,

Jean Pascal van Ypersele, Professor, Université Catholique de Louvain, Former IPCC Vice-chair, member of the Royal Academy of Belgium

Eric Lambin, Professor Université Catholique de Louvain and Stanford University, member European and U.S. Academies of Science, 2014 laureate of Volvo Environment Prize

Wolfgang Cramer, Research Director, CNRS, Mediterranean Institute of marine and terrestrial Biodiversity and Ecology, Aix-en-Provence, member Académie d'Agriculture de France, Coordinating lead author and lead author of multiple IPCC reports

Wolfgang Lucht, Professor Humboldt University and Co-Chair of Potsdam Institute for Climate Research Research Domain on Earth System Analysis, lead author of multiple IPCC reports

Peter Raven, Director Emeritus Missouri Botanical Society, Recipient U.S. National Medal of Science and former President of American Association for Advancement of Science

Timothy D. Searchinger, Research Scholar, Princeton University

Bjart Holtmark, Senior Researcher, Statistics Norway