

Mr Frans Timmermans
Executive Vice President
European Commission
200 Rue de la Loi
1049 BRUSSELS



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Dear Vice President

Wild Europe is writing with three requests, in advance of the publication next week of the EU Biodiversity Strategy (see Appendix I for information on our partnership).

The first request is on the issue of biomass, in particular the burning of timber for bioenergy.

Contrary to what its proponents claim, this is not carbon neutral, worsens climate change, emits unhealthy particulates, is the least efficient means of generating energy, and destroys large areas of biodiversity rich forest. A series of reports all point towards this conclusion (see sample in Appendix II).

Alongside the environmental arguments, heavy subsidies for wood bioenergy which totaled some 7.5 billion EUR in 2017, represent a highly significant misallocation of taxpayer and consumer resources.

With a priority to rebuild economies in the COVID era, such misuse of scarce capital is increasingly seen as unacceptable.

Put simply, wood bioenergy undermines all eight elements of the excellent and visionary EU Green Deal, as summarized in the table below (Appendix III).

Alliances are now being developed between environmental interests and taxpayer and consumer associations, investment institutions and representatives of industrial sectors that are genuinely addressing climate change: effective sources of renewable energy (wind, photovoltaic, marine), together with those involved in emission reduction, insulation, recycling.

These diverse interests have one aim in common – to put an end to wasteful subsidies for wood bioenergy, alleviate a wholly unjustifiable burden on productive business and personal livelihoods, and reallocate resources towards the genuine address of climate change that is so urgently needed.

We confidently anticipate this collective approach will have considerably more impact on decision takers than has been the case previously with more specifically environmental representations alone.

Our requests to your office and the European Commission

We request the immediate cessation of all subsidies and discouragement of all further support for wood bioenergy, both within the European Union and, via the many channels of influence open to the EC, elsewhere in Europe and internationally.

This should lead to encouragement of the following:

- 1) Replacement of wood burning, particularly as a commercial enterprise, by greater investment into effective renewable energy sources such as offshore wind, photovoltaic, marine - where location does not compromise natural ecosystems
- 2) Redirection of funding into other means of addressing climate change – including improved energy use, emission reduction, insulation, recycling
- 3) More efficient allocation of scarce taxpayer, consumer and investor resources into areas of positive economic productivity – including support for genuinely productive forestry, agriculture and rural economies generally
- 4) Greatly increased support for ‘nature-based solutions’ which have a major and highly cost-effective role to play in addressing climate change: protection and restoration of natural ecosystems - with their high capacity for carbon storage and other ecosystem services, as well as for building resilience and assisting adaptation.

In respect of item 4) above, objectives in the 2020 Biodiversity Strategy need to be assured by the formulation of specific targets.

We request in particular that all old growth/primary forest, amounting to some 4% of total forest cover in Europe, be rapidly subject to strict protection, along with a further 6% of near-natural forest (which would also address fragmentation & ‘edge effect’ and ensure maximised ecological function and connectivity), totalling a minimum of 10% of the current forest area.

We further request that such strict protection be applied generally to 10% of Europe’s terrestrial and marine areas, to include a network of old growth/primary forest together with peatland, wetland, natural grassland and coastal habitats.

We additionally urge the promotion by the EC of such targets in non-EU countries of Europe, via the many channels of influence open to the EC including: neighbor agreements, accession treaties, trade & aid policies and exchange of best practice.

This 10% target is in accord with the strictly protected core area commitment in the draft 2020 EU Biodiversity Strategy (1/3 of the overall 30% protection target “will consist of strictly protected core areas” – see Appendix IV). The target is already echoed at national level, for example by the 10% “pleine naturalité” (“full naturalness”) declared aim of French President Macron, and 2% and 10% total protection targets for terrestrial area and state forests respectively being implemented by the Federal government in Germany.

All these targets should be accompanied by a full programme of compensation and PES related enterprise support to those parties directly involved, including local landholders and communities. Wild Europe will be making a number of further proposals here.

Confirmation and implementation of the above targets will represent the most effective address of the dual crises of climate change and species extinction, and contribute decisively via the PES agenda to recovery of the rural economy from the impact of COVID, in addition to the wellbeing of society in general.

We are grateful for your attention to this letter and its requests

With best regards

Wild Europe Initiative

Toby Aykroyd

Coordinator

Győr Office:

Pósa Lajos út 11
9011 Győr
HUNGARY

Mob: +36 20 360 6886
Skype: zoltankun71
zoltankun@wildeurope.org

London Office:

1 Pembridge Crescent
London W11 3DT
UNITED KINGDOM
Tel: +44 207 792 9776
Mob: + 44 (0)779 355 1542
Skype: Toby.Aykroyd
tobyaykroyd@wildeurope.org

Brussels Office:

64 Boulevard Louis Schmidt
Brussels 64-B-1040
BELGIUM

info@wildeurope.org



Appendix I

Background to Wild Europe

Wild Europe is a partnership initiative promoting protection and restoration of large natural ecosystem areas, focusing on non extractive socio-economic benefit for local communities and landholders alongside conservation objectives.

The initiative involves representatives and individuals from a variety of conservation NGOs, consultancies and institutions, including the EC, Bern Convention and UNESCO – with input from economists, business, landholders, forestry and ecosystem service specialists. It is chaired by Ladislav Miko, former director of natural environment at the European Commission DG Environment, and was recommended to the EC by a European Parliament Resolution in 2009, the year of its launch.

Appendix II

Sample technical reports & representations on the impact of wood burning for bioenergy

- EU Technical Expert Group (TEG) March 2020 *Report on Sustainable Finance Taxonomy*
- NRDC November 2019 Report *Burnout: EU clean energy subsidies lead to forest destruction*
- The European Academies of Science Advisory Council Statement (EASAC), June 2018: *The EU's renewable energy ambitions: Bioenergy from forests is not always carbon neutral - and may even increase the EU's carbon emissions.*
- Forestry Commission Research UK May 2018 *"Carbon impacts of biomass consumption in the EU"* report for the European Climate Foundation.
- A collective letter to the EU Parliament signed by 780 scientists, January 2018: *"Even if forests are allowed to regrow, using wood deliberately harvested for burning will increase carbon in the atmosphere and warming for decades to centuries as many studies have shown even when wood replaces coal, oil or natural gas"*
- EASAC Report, May 2017 *"Multi-functionality and Sustainability in the European Union's Forests"*
- Royal Institute of International Affairs (RIIA), February 2017 *"The Impacts of the Demand for Woody Biomass for Power and Heat on Climate Change and Forests"*

Appendix III

How wood bioenergy undermines all eight NGD elements

The eight EU Green Deal elements	The impact of wood bioenergy burning on these
1) Increasing the EU's climate ambition for 2030 and 2050	Is not carbon neutral, significantly nullifies the EU's efforts to reduce emissions, undermines its climate ambition and compromises its international image
2) Supplying clean, affordable and secure energy	Adds significantly to air pollution, is the least cost-effective energy production, contributes to fuel poverty by increasing domestic firewood prices, and causes forest carbon resource to shrink
3) Mobilizing industry for a clean and circular economy	Adds significantly to air pollution and produces levels of GHG in the atmosphere that are the antithesis of circularity. Also uses resources that could be invested in recycling.
4) Building and renovating in an energy and resource efficient way	Diverts investment and marketing support from insulation, emission-reducing technology and more efficient means of energy production
5) A zero pollution ambition for a toxic free environment	Adds significantly to air pollution and significantly reduces the air cleaning capacity of forests
6) Preserving and restoring ecosystems and biodiversity	Results in wholesale damage to ecosystems and biodiversity, through comprehensive clearance of forest biomass on a very large scale, and worsening the impact of climate change
7) From farm to fork – a fair, healthy and environmentally friendly food system	Indirectly removes land availability for food production, adds to air pollution, reduces the air cleaning capacity of forests and destroys ecosystems

8) Accelerating the shift to sustainable and smart mobility	Potentially diverts investment from efficiency improvements in mobility technology
Promoting wood bioenergy, despite its clear negative impacts, inefficiency and huge expense, risks undermining the long-established global credibility of the European Union as a highly respected proponent of best environmental practice.	

Appendix IV

10% strict protection target related to the draft Biodiversity Strategy

Page 3 Objective II B target for the Global Biodiversity Framework. “At least 30% of all terrestrial, inland water, coastal and marine areas is covered by well-connected systems of effectively managed and equitably governed Protected Areas of Other Effective Conservation Measures, covering the most important areas for biodiversity”

Page 6 EU Commitments to lead by example: 2. Protect nature. “Currently 18% of the land area is covered by Natura 2000 sites (19% without the UK) and an additional 8% by various forms of national protected areas...”

“To cover (in line with proposals made in the context of the CBD) at least 30% of both EU land and sea area by a network of effectively and equitably managed, as well as ecologically representative, protected areas and/or other area-based effective conservation measures (OECMs). They will be legally protected, covering the most important areas for biodiversity including Natura 2000 sites and other designated areas. They will be based on all relevant mapping of ecosystems and their services.”

“At least 1/3 of the EU wide network will consist of strictly protected core areas, including OECMs, covering terrestrial, marine and freshwater habitats of very high biodiversity value or potential.”