



To the attention of the
 Member of the European Parliament
 Nils Torvalds
 60, Rue Wiertz
 B-1047 Brüssel
 Per email: nils.torvalds@ep.europa.eu

December 22nd 2022

RE: Deletion of Primary woody biomass in REDIII

Dear Mr Torvalds,

As part of the Green Deal and the "Fit for 55" package, the EU has decided to revise the Renewable Energy Directive (EU 2018/2001 - RED II). The course set by RED III is of crucial importance for the attainability of the climate targets, the success of the energy transition and climate adapted forest-management.

We are particularly concerned about the provisions related to "primary woody biomass" demanded by the EU Parliament. The definition includes all forest wood, with exceptions that will be difficult to handle in practice. According to the Parliament's proposal, "primary woody biomass" should be excluded from support for renewable energy and its eligibility as renewable energy should be limited

to the share of the years 2017-2022, with a phase-down to 2030. The undersigned associations ask to support a complete deletion of "primary woody biomass" in the ongoing dialogue negotiations.

The European Parliament's proposal would place new and unnecessary burdens on the market, which would only constrict the supply of renewable energy without any clear benefits for sustainability. The undersigned associations support strong sustainability criteria for forestry, in line with the Council General Approach. But "primary woody biomass" is not an indicator of quality or specific end-use.

The consequences of "primary woody biomass" would be severe:

- "Primary woody biomass" would apply independently of the threshold for the sustainability criteria in Article 29, paragraph 1, subparagraph 4, as the threshold only applies to the sustainability criteria in paragraphs 2-7 and 10. This jeopardizes, among other things, the zero-emission factor for wood in the ETS as well as any national support schemes for renewable energy. So far, it is only foreseen that support for consumption should be excluded, but experience with RED II implementation shows that member states also apply the RED criteria beyond the scope foreseen. An extension to support programs for investments in renewable energies - and not their consumption - is thus to be expected.
- It is to be expected that total energy consumption will decrease due to energy saving and efficiency measures. Limiting the accountability of "primary woody biomass" to the (relative) share that "primary woody biomass" had in total energy consumption in 2017-2022 would thus also lead to a decreasing amount of "primary woody biomass" in absolute terms.
- The proposal would also jeopardize the adaptation of forests to the climate crisis and the improvement of wood quality by prohibiting all thinning operations, particularly in hardwood stands, as the income that can be generated from the energetic use of low quality wood from sustainably managed forests helps to finance forest management and the establishment of climate resilient forests, especially in small private forests. For small and medium-sized wood-fired power plants that supply local heating networks or provide process and industrial heat, and thus for the further expansion of renewable heat, these wood assortments also represent important fuels.
- In the medium term, the Sustainable Finance Taxonomy is also expected to take up the definition of "primary woody biomass" and would thus have an impact on the financing of energy transition projects: Since Art. 19, Para. 5 of the Taxonomy Regulation [(EU) 2020/852] provides for the regular review of the technical assessment criteria, it can be expected that an adjustment to the RED III criteria will take place and thus the use of primary woody biomass will no longer be considered "green" in the sense of the taxonomy.

We would also like to highlight the risk of detailed policy on the cascading principle, since the optimal use from an economic and environmental perspective can vary according to local circumstances, material properties and timing.

Already today, the cascade of utilization is automatically implemented via market prices, since every market participant has an interest in utilizing wood and waste wood in the best possible way and several times.

For all the reasons stated above, and in line with the Council's General approach on this issue, we oppose the creation of "primary woody biomass" as well as the limitations on the use of residual and low-quality roundwood biomass. We thus call for your support in successfully deleting all provisions related to primary wood biomass and all associated restrictions.

Please do not hesitate to contact us if you wish to further discuss wood use or other forest-related matters to RED III. We wish you a joyful and relaxing holiday season.

Yours sincerely,

AGDW – die Waldeigentümer	Dr. Irene Seling, Executive Director
Bundesverband Bioenergie e.V. Fachverband Holzenergie CZ Biom	Gerolf Bücheler, Executive Director
Dansk Skovforening	Jan Habert, Executive Director
Deutsche Säge- und Holzindustrie	Anders Frandsen , Managing Director
Eesti Erametsaliit	Julia Möbus, Executive Director
EFF – Experts forestiers de France	Ando Eelmaa, Head of the Board
Familienbetriebe Land und Forst	Sylvestre Coudert, President
Fédération Nationale du Bois	Fabian Wendenburg, Executive Director
France Bois Forêt	Nicolas Douzain-Didier, Executive Director
Fransylva	Jean- Michel Servant, President
FOAL – Forest and landowner association of Lithuania	Antoine d’Amécourt, President
LKF – Latvian timber industry federation	Dr. Algis Gaizutis, Chairman
LRF – Federation of Swedish family forest owners	Kristaps Klauss, Vice-President
MIB – Latvian forest owner association	Magnus Kindbom, Director
MTK	Arnis Muiznieks, Chairman
Norges Skogeierforbund	Marko Mäki-Hakola, Director
Österreichischer Biomasseverband	Per Skorge, Director
Seila – Syndicat de l’emballage industriel et de la logistique associé	Christoph Pfemeter, Executive Director
Swedish Wood-Fuel Association	Nicolas Derouault, President
SYPAL – Commission FNB de la palette bois	Bertil Leijding, Chairman
SZVT – Slovakian association of heat producers	Jean-Philippe Gaussorgues, Executive Director
UCFF - Union de la Coopération Forestière Française	Stanislav Janiš, President
ÚNIA - Union of regional association of non state owned forest from Slovak Republic	Bertrand Servois, President
Waldverband Österreich	Milan Ovseník, President
	Rudi Rosenstatter, President
	Martin Höbarth, Managing Director