Environmental Paper Network
BIOMASS ACTION NETWORK

EU Bioeconomy Strategy - Biomass Action Network position paper.

The Biomass Action Network (BAN) welcomes this opportunity to contribute to the public consultation on the revision of the EU Bioeconomy Strategy. While we are mindful that the issue of the bioeconomy is broad and multifaceted, this position focuses on the problem of using forest biomass for energy generation, the main focus of BAN.

Forests are a key natural resource providing a range of ecosystem services related to inter alia climate change mitigation and adaptation, biodiversity conservation, protection of water resources, air purification, recreation, or supply of wood for the economy. Seeking to maximise the provision of all these services is often in conflict with each other. In particular, the economic imperative requiring wood harvesting in forests is often at odds with the effective provision of other services, and thus forests suffer from excessive logging.

These contradictions are evident in the various targets the EU aims to fulfil using forests. On the one hand, the EU has set several climate and biodiversity targets, including increased carbon removals in the LULUCF sector, strict protection of 10% of the EU's land area (including all old-growth forests), and restoration of forest ecosystems. On the other hand, EU Member States are obliged to meet RE targets. Since forest biomass is classified as a Renewable Energy Source, subsidies granted by EU member states to the bioenergy industry have led to a dramatic increase in the demand for wood and increased wood harvesting, which has driven the collapse of the EU forest carbon sink[1] and degradation of forests in Europe and around the world.

Thus, by incentivising the generation of energy from forest biomass, in the name of meeting renewable energy targets, the EU undermines its climate and biodiversity targets while contributing to the destruction of forests beyond its borders. The situation is made worse by the fact that forest biomass is no less carbon-intensive an energy source than fossil fuels, including coal.

We urge the EU to seize the opportunity presented by the revision of the Bioeconomy Strategy and move away from promoting and supporting wood burning for large-scale energy generation and instead focus on more appropriate uses of this valuable and scarce resource. This will help to protect and restore forest ecosystems for the benefit of the climate, people and the long-term sustainability of the EU economy. Below, we make the case that burning wood in large-scale energy plants contradicts the objectives of the EU Bioeconomy Strategy.

Promoting forest biomass energy undermines the EU's climate and biodiversity targets.

In the call for evidence regarding revision of the EU Bioeconomy Strategy (further: call for evidence) the European Commission claims that: *the bioeconomy plays a key role in supporting the EU in reaching its climate and energy goals by 2030 and climate neutrality by 2050, while combating biodiversity loss and pollution.* However, currently, the overconsumption of wood for energy has several negative environmental and climate impacts both within and outside the EU.

[1] Booth, M. S., & Giuntoli, J. (2025). *Burning up the carbon sink: How the EU's forest biomass policy undermines climate mitigation. GCB Bioenergy, 17*(5).

Demand for wood in the energy sector has been a key driver of increased harvesting in the EU in recent years, contributing to the sharp decline in the EU forest carbon sink. The link between increased timber harvesting and decreased carbon sequestration in forest ecosystems in the EU has been recognised by several reputable sources[2][3][4]. In multiple EU countries which produce large amounts of woody biomass for energy (including Estonia[5], Germany[6] and Finland[7]), forests have become net carbon sources. As a result, both the EU as a whole and most member states are not on track to meet their 2030 LULUCF carbon removal targets[8].

Intensification of wood harvesting threatens biodiversity in the EU and beyond and conflicts with the EU's nature conservation and restoration objectives, including those set out in the EU Biodiversity Strategy 2030, the Nature Restoration Law and the Kunming-Montreal Biodiversity Framework. According to European Environmental Agency data, forestry is the greatest threat to protected Natura 2000 forest habitats[9]. Reports from Lithuania, Estonia[10][11], Bulgaria, Romania and Slovakia[12] point to examples of impacts on forest ecosystems related to logging for energy, including clear-cutting in protected areas, felling in protected species' habitats and encroaching into old-growth forests. In Poland, the demand for wood in the energy sector is one of the main challenges blocking the creation of protected areas in forests. The demand for woody biomass for energy in the EU drives the degradation of natural ecosystems beyond its borders, contributing to, inter alia, the destruction of high-conservation value forests in Canada and the United States[13].

The sustainability criteria in the Renewable Energy Directive (RED) do not address these issues. They only have a limited impact on individual logging operations, and do not exclude primary woody biomass from the list of renewable energy sources. Consequently, they do not solve the problem of driving the intensification of logging by the growing demand for wood in the energy sector. This also applies to the obligation introduced within the RED revision to ensure

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[2] the European Scientific Advisory Board on Climate Change.(2024). *Towards EU climate neutrality: progress, policy gaps and opportunities*.

[3] European Commission.(2024). *Impact Assessment Report, accompanying Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society.*

[4] Jonsson, R., & Sotirov, M. (2025). Future Wood Availability in Europe In Light of Climate and Energy Policy and Geopolitical Developments—A Wood Resource Balance-Based Assessment. *Sustainability*, *17*(3), 1291.

[5] Eestimaa Looduse Fond. (2022). *Taustapaber: Metsaraie ja susinku sidumise seos. Eesti olukord ja valikud.*

[6] Riedel T. (2024). *Results of the 2022 National Forest Inventory*..

[7] Natural Resources Institute Finland. (2025). *Preliminary greenhouse gas inventory results for 2023: Forest land has turned into an emission source because the carbon sink of trees no longer cover emissions from forest soil.*

[8] European Commission. (2025). *Communication from the Commission to the European parliament, the Council, the European economic and social committee and the Committee of the regions: EU-wide assessment of the final updated national energy and climate plans Delivering the Union's 2030 energy and climate objectives* (COM(2025)).

[9] *Main pressures and threats*. (2019, December 19). European Environment Agency's Home Page.

[10] NOAH. (2025). *No smoke without fire: How the Danish energy transition harms the forests of Estonia and Latvia*

[11] Kuresoo, S., Kuresoo, L., Lilleväli, U., Estonian Fund for Nature, Latvian Ornithological Society, Fern, Biofuelwatch, Forests of the World, Leefmilieu, Comité Schone Lucht, David and Lucile Packard Foundation, & Estonian Fund for Nature. (2020). *Intensive logging impacts in Estonian and Latvian forests* [Report].

[12] Environmental Investigation Agency. (2022). *There is a lie at the heart of Europe's climate policy – the fallacy that burning trees for energy is good for the climate*.

[13] Biomass Action Network of EPN (2024).*BURNING UP THE BIOSPHERE*. A global threat map of biomass energy development.

that the domestic supply of wood for energy is consistent with LULUCF targets. According to the European Commission's assessment of the final updated national energy and climate plans for 2021-2030 only nine EU Member States project to reach their LULUCF targets, while the plans still lack information concerning the domestic supply of forest biomass for energy, on how forest biomass will be used for energy generation and how this relates to meeting obligations under the LULUCF Regulation.

Promoting forest biomass energy contradicts the principles of the circular economy, resource efficiency and the cascading use of biomass.

In its call for evidence, the European Commission states that the EU Bioeconomy Strategy should prioritise extended, high-value applications of biomass and resource efficiency encouraging consumers and industries to embrace circular practices, in line with the cascading use of biomass principle. Promoting large-scale forest biomass energy contradicts all of these assumptions, directing wood to the least efficient and environmentally and economically low-value application.

The proportion of wood harvested in the EU burned for energy has increased from 42 to 50% since 2005, despite the fact that, according to the principle of cascading wood use, bioenergy is the least desirable of wood uses. Nevertheless, in several EU countries, wood which can be used for material application is burned in energy plants. Unlike the bioenergy industry, the wood processing industry does not receive subsidies to buy raw materials and this reduces its competitiveness. Paradoxically, it is precisely the most carbon-intensive and lowest-added-value use of wood that is supported financially. The best evidence of the significance of this fact for the wood processing industry is the many appeals by its representatives to move away from promoting subsidies for burning wood[14].

Reliance on biomass energy will increase the EU's dependency on third-country supplies, undermining the energy security of its member states.

The call for evidence points to the need to reduce external dependencies and ensure energy security. Continued promotion of biomass energy in the EU will contribute negatively to both of these aims. The demand for wood for energy purposes in the EU is already too high to be met by domestic harvesting. As a result, EU countries are among the world's largest importers of woody biomass for energy purposes, creating energy dependence on external suppliers from other countries. Further promotion of biomass energy will only increase the gap between domestic production and demand, further increasing this dependency and reducing the EU's energy security. This is particularly important in the context of rising international tensions, which have already resulted in the instability of international trade. The number of armed conflicts is also increasing, which strengthens the case for avoiding dependence on external energy supply chains. The European Union recently experienced an energy crisis due to its dependence on fossil fuels imported from Russia, and efforts should be made to avoid repeating this mistake with biomass.

[14] Forest Defenders Alliance (2023). *Wood product manufacturers sound the alarm about burning wood for energy.* Forest Defenders Alliance.