

To Mr.
Gilberto Pichetto Fratin
Minister of the Environment and the Energy Security
Viale Cristoforo Colombo,44
00147 Roma

Milan, 11th November 2022

RE: Primary woody biomass issue ahead of the triologue negotiations on REDIII

Dear Minister,

In view of the Renewable Energy Directive (REDIII) triologue negotiations, the undersigned European bioenergy associations together with Bioenergy Europe are calling on European policymakers to take a strong stance against the newly proposed definition for “primary woody biomass” (PWB).

Covering over 50.000 businesses in the EU, bioenergy is an example of a true European industry with 74% of all bioenergy equipment suppliers being based in Europe. As the main legal framework for our sector, REDIII outlines the criteria which biomass must meet to be considered sustainable, to count toward renewable energy targets and to be eligible for financial support. It is very important for our sector to have a workable framework, while at the same time, we believe strong requirements for demonstrating sustainability are necessary. We are particularly concerned given that the European Parliament’s proposal defining PWB would place new and unnecessary burdens on the market, which would only constrict the supply of renewable energy without any clear benefits for sustainability.

PWB is not an indicator of quality or specific end-use. Furthermore, questioning its sustainability directly contradicts the section of the 2021 Joint Research Centre (JRC) report on the use of woody biomass for energy production in the EU, which strongly opposes a blanket ban on the use of PWB for energy.

The restrictions proposed by the European Parliament would cause significant disruptions to the EU’s energy market, impacting up to 35,7% of the feedstock for bioenergy. This would prevent the sector from receiving financial support at a time when new subsidies are being channelled into fossil fuels.

Another consequence of the ban on primary woody biomass would be to create severe market distortions in the secondary biomass market. At a time of skyrocketing energy prices and gas shortages, such restrictions on a readily available, local and renewable energy source would be counterproductive, not to mention would irresponsibly push actors to resort to fossil energy.

We strongly believe that a sound policy framework, at both the national and European levels, is essential to consolidating and increasing investors’ confidence while achieving higher ambitious targets. In this context, it is crucial that the revision and implementation of the RED is progressive yet well-reasoned and implementable on the market. We need to ensure a participatory approach that combines scientific research with the demands of the industry, and which places circularity back at the centre.

For all the reasons stated above, we oppose the creation of a “primary woody biomass” definition as well as the limitations on the use of residual and low-quality roundwood biomass. We thus call for your support in successfully deleting this definition and all associated restrictions.

Yours sincerely,
National Associations members of Bioenergy Europe



Italian Agroforestry Energy Association



Energia da Biomasse solide



Portuguese Association of Wood and Furniture Industries

Portuguese Association of Wood and Furniture Industries



Elettricità Futura



Spanish Renewable Energies Association



FEDERAZIONE ITALIANA PRODUTTORI DI ENERGIA DA FONTI RINNOVABILI

Federation of Italian Producer of Renewable Energy



Spanish Bioenergy Association



Fachverband Holzenergie im BBE



Finnish Bioenergy Association



Hellenic Biomass Association



German Bioenergy Association



Lithuanian Biomass Energy Association



Czech Pellet Cluster



Austrian Biomass Association



Czech Biomass Association



French Pellet Heating Association



Danish Bioenergy Association



Swedish Bioenergy Association