

Bioenergy in the recast of the Renewable Energy Directive

BY BIRDLIFE EUROPE, FERN, AND TRANSPORT & ENVIRONMENT

The European Parliament is currently discussing the recast of the Renewable Energy Directive (RED II) which will determine how biomass can be used for energy towards meeting the EU's renewable energy target and minimum sustainability safeguards. Considering the many different amendments that have been tabled on this issue, the undersigned NGOs want to highlight the key priorities in order to put the EU's bioenergy policy on the right track after 2020.

1. Food-based biofuels – keep the ambition & phase them out

No new renewables target for transport with food based biofuels

The current binding target of 10% of renewable energy in transport has overwhelmingly driven the use of the highest emitting biofuels – food based biodiesel. While a new overall target for renewables in transport (suggested in articles 3 and 25) can appear attractive at first, in reality it would again drive the use of food-based biofuels repeating the mistakes of the current failed EU policy. For cleaner and more sustainable options such as renewable electricity there is already a separate target of 6.8% in the RED II proposal.

Support an ambitious limit on all food based biofuels

The Commission is proposing to cap food-based biofuels to 3,8% of the energy consumption in transport in 2030 (article 7.1). This gives the markets the right signal, even if it results in only a slight decrease in the current levels of biofuel consumption. A 7% cap as suggested by some amendments would be counterproductive for the climate, as it would lead to around 190 Mt of additional CO₂ emissions compared to the 3,8%¹. On the contrary, amendments which suggest a full phase out to 0% in 2030 with a quicker phase out of biodiesel, would bring more GHG savings than the 3,8% cap.

Take indirect emissions into account in the GHG calculations

ILUC emissions need to be included in the GHG calculations of biofuels (article 28.1) to ensure that the use of the highest emitting biofuels under the cap, like palm and soy oil biodiesel, are disqualified first. Amendments trying to distinguish different kinds of food based biofuels through a new category of “highly sustainable crop based biofuels” are misleading and would in practice exclude almost all food based biofuels from the crop cap.

1: https://ec.europa.eu/energy/sites/ener/files/documents/globiom_complimentary_2016_published.pdf

2. Advanced (bio)fuels – handle with care

Ensure only true advanced renewable fuels qualify

Only biofuels from true wastes and residues that do not lead to significant indirect displacement effects should be eligible as advanced biofuels (Annex IX) and count towards the 6,8% target proposed by the Commission for advanced fuels (article 25.1). To maintain the integrity of advanced biofuels, feedstocks like molasses or pulp wood that already have other existing uses should be removed from the Annex IX and no crop based biofuels or waste based fossil fuels should be included in eligible fuels.

To ensure that displacement effects are taken into account and that the use of incentivized residues and wastes is truly environmentally beneficial, ambitious GHG savings thresholds including indirect emissions, the waste hierarchy and cascading use principle, as well as safeguards for biodiversity and soil need to be applied.

Keep targets within sustainable boundaries

A precautionary approach is needed with advanced biofuels as there is high uncertainty and limited knowledge on availabilities of sustainable feedstocks and competing uses by other industries. The Commission's proposed target of 3,6% by 2030 for advanced biofuels (article 25.1) pushes the limits of availability of sustainable feedstocks and should therefore be lowered.

Support additional incentives for renewable electricity

Compared to the Commission proposal, the creation of a market database is needed to allow all forms of renewable energy – not just biofuels – to contribute to the 6,8% target in transport (article 25). Companies supplying renewable electricity to transport would have the opportunity to qualify for clean fuel credits which they can sell to fossil fuel suppliers. To give renewable electricity a fair chance, it should also be given a multiplier of 2.5 to reflect its higher efficiency (in terms of work it provides per unit of energy) compared to liquid biofuels.



3. Forests and biomass – don't waste trees for electricity

Only support the use of forest residues and waste for energy

Sustainable forest management criteria as proposed by the Commission (article 26.5) unfortunately won't ensure resource-efficient, climate friendly and sustainable use of wood for energy – as it would only regulate forest management. The use of wood and other solid biomass for energy should be limited to woody waste and residues only, or at least the most high risk feedstocks like roundwood and pulp wood should be excluded - as suggested by various amendments.

No support to inefficient electricity production from biomass

The RED II proposal disqualifies electricity from new, inefficient biomass installations, requiring them to be at least high efficient co-generation (article 26.8). While this is a step to the right direction, the efficiency requirements should be strengthened and they should enter into force as soon as the rest of the RED II provisions, without grace periods. Biomass co-fired with fossil fuels should not be supported as it provides a hidden subsidy for the existing fossil fuel infrastructure.

Extend the scope of all sustainability criteria

The sustainability criteria are proposed only for heat and power installations bigger than 20 MW or for biogas installations bigger than 0,5 MW, which leaves unregulated at least more than half of the biomass counted as renewable energy (article 26.1). The criteria should be extended to installations starting from 1 – 5 MW to cover the majority of biomass use, while still keeping household or private use out of the scope.

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