

A joint non-paper from Czech Republic, Estonia, Hungary, Latvia, Lithuania and Poland on the biomass and bioenergy aspects of the EU taxonomy

The agreement on the overarching Taxonomy Regulation (EU 2020/852) stipulated as one of its guiding principles that EU taxonomy must be based on the current agreed EU legislation.

This principle should be respected when developing the biomass and bioenergy aspects of the delegated act deriving from the EU Taxonomy.

The future EU policy for bioenergy should be developed in close cooperation with Member States and within the appropriate sectoral legislation, i.e. energy policy.

Forests play many important roles in the EU manifesting in several industries like chemical, buildings, wood products (e.g. furniture, construction materials) and energy production. In a similar fashion forests and forestry itself is integral for the achievement of EU Green Deal goals. The way we use our land has immense effects on our possibility to sequester carbon, fight against climate change and adapt to it, protect and restore biodiversity and ecosystems, produce food and use our valuable natural resources.

Forests are the basis of our ecosystem services, our ever-important carbon sinks, our biodiversity and our bioeconomy. For forest rich countries, securing a proper balance between all these aspects is sometimes difficult but always vital. **The sustainability criteria on forest biomass usage in energy at the EU level were established with the Renewable Energy Directive (EU 2018/2001),** to ensure that biomass for energy is produced, processed and used in a sustainable and efficient way in order to optimise greenhouse gas savings and maintain ecosystem services.

In this regard, we would like to stress the following aspects:

- **The EU forests are diverse and the composition can vary significantly from one Member State to another.** The national circumstances largely dictate the forest management rules and principles established in individual Member States under the concept of sustainable forest management. Therefore, the approach of Renewable Energy Directive taking into consideration national requirements for ensuring the sustainability of forest biomass is highly appropriate and should be respected.
- **It is vital for securing a stable regulatory environment for the biomass sector for the next decade.** Large private investments are needed in the transition to climate neutrality. Long-term clarity at EU level is vital for these investments to take place. The uncertainty regarding the policy direction is one of the most important investment barriers in the field of renewable energy.
- The transposition of the Renewable Energy Directive should be implemented by mid-summer 2021. **The impact of enforcing the new biomass sustainability criteria cannot be credibly assessed at this stage.**

We urge the Commission while developing the EU taxonomy framework to retain the approach of using Europe's renewable sources in the most cost-efficient and sustainable way possible,

while substituting fossils. Furthermore, the Taxonomy Regulation stipulated as one of its main principles that the **delegated regulation being developed must be based on the most recently agreed and enforced EU legislation to ensure the consistency with sectoral legislations and maintain investor certainty in the sectors. In the case of bioenergy, this is the current Renewable Energy Directive (EU 2018/2001).**

As energy sector still contributes to 75% of greenhouse gas emissions, the transition to clean energy systems and climate neutrality will require all renewable energy sources to be effectively and sustainably used. **Biomass for energy is currently the main source of renewable energy in the EU, with a share of almost 60%¹.** It therefore plays a key role in achieving the EU's renewable energy targets for 2030.

We want to assure the Commission, that we are ready to **actively participate in the further Commission's analysis** of the current situation and the specificities of Member States regarding forest biomass use for energy and if the need arises, **in designing a fair and practical future legislative framework within the energy policy** with well-functioning and understandable definitions taking into account different national circumstances.

¹ Brief on biomass for energy use in the European Union – The European Commission's Knowledge Centre for Bioeconomy.