



FSC'S THREE RECOMMENDATIONS ON THE EU COMMISSION PROPOSAL ON REVISING THE EU RENEWABLE ENERGY DIRECTIVE II

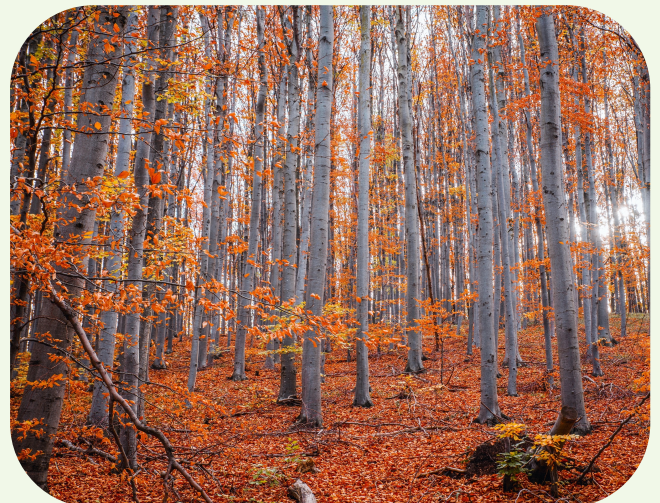
FSC supports the EU Commission goal of ensuring that the EU Renewable Energy Directive (RED) contributes to the highest climate and biodiversity ambition in line with the EU Green Deal. For this, FSC would like to share the following recommendations:

1. Reinforcing the REDII sustainability criteria for bioenergy in line with the EU Green Deal Climate ambition

The current five sustainability criteria outlined in article 29 REDII do not fully encompass the concept of sustainable forest management (SFM). Notably, the five requirements lack strong environmental criteria and do not consider social criteria, which are an essential component of SFM. Hence, in line with the EU implementing act on the sustainability criteria for forest biomass used in energy production, FSC encourages the EU Commission to raise the bar on the RED sustainability criteria, in particular to include:

- Protection of primary and old-growth forests – in line with the new EU Forest Strategy.
- That sourcing the forest biomass does not affect water courses and forest related ecosystems, such as wetlands and peatlands.
- Exclusion of conversion (from natural to semi-natural, and from (semi-)natural to plantations).

- Protection of High Conservation Values.
- That no biodiversity degradation happens in the regenerated forest area – in line with the new EU Biodiversity Strategy and 30% protection target.
- That the social and economic well-being of workers should be maintained and/or enhanced.
- Free, prior and informed consent is secured before any forest management activity occurs in the lands where Indigenous Peoples have customary or legal rights.



2. Prioritizing the “cascading use of wood” principle

FSC encourages the EU Commission to prioritise the “cascading use of wood” principle, which is defined as the “efficient utilisation of resources by using residues and recycled materials to extend total biomass availability within a given system”. This is also in line with the new EU Biodiversity Strategy which refers to use of “residues and non-reusable and non-recyclable waste” for advanced biofuels, which “should continue for all forms of bioenergy.” FSC has supported this principle since 2016: we believe that re-using wood wastes can help in reducing the harvesting pressure on forests.

Based on support for this principle, FSC supports the phasing out of subsidies for burning any primary woody biomass, i.e. materials taken straight from the forest and used for energy, rather than wastes and residues from saw mills or paper mills, post-consumer wood waste, etc.

3. Moving from the risk-based approach to the precautionary approach

Article 29 RED II follows a risk-based approach, which undermines EU climate policy objectives. In fact, according to article 29, biomass users need to assess risks at country-of-origin level (assessment at sourcing area level). Further mitigation measures (assessment at forest holding level) are only needed if the users have assessed that there are substantial risks of unsustainable forest management practices. This approach does not guarantee sustainable management of the specific use of forest for feedstock, or which feedstocks are used for energy, which ultimately leads to risks associated with biodiversity, carbon stock change and indirect land use change. FSC, instead, calls the EU to adopt a precautionary approach whereby assessment is carried out at forest holding level and strong mitigation measures, such as FSC certification, are always required.

About FSC

As the pioneer of forest certification, FSC has 25 years of experience in sustainable forest management and is widely regarded as the world’s most trusted forest certification system. FSC uses its expertise to promote the responsible management of the world’s forests, bringing together experts from the environmental, economic, and social spheres. FSC standards are based on ten core principles designed to prevent deforestation and degradation, and safeguard biodiversity, water quality, carbon storage, and workers’ rights, among other key environmental and social values. More [here](#).

Questions and queries

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