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Research on Land Use, Land-Use Change, and Forestry (LULUCF)



The EU claim that it's GHG criteria, the Sustainability criteria, and the LULUCF criteria ensure that biomass burned for energy reduces emissions relative to fossil fuels is simply wrong. As a result it undermines its own purpose of reducing GHG emissions, violates the treaty obligations and infringes the fundamental rights of humanity.

Serious Mismatch Between Science & Policy

[2019-08-22-bioenergy-serious-mismatches-continue-between-science-and-policy-in-forest-bioenergy-english.pdf](#)

This report based on recent work by Europe's Academies of Science was commissioned by 16 international institutions and finds that current policies are failing to recognize that removing forest carbon stocks for bioenergy leads to an initial increase in emissions and states the periods during which atmospheric CO₂ levels are raised before forest regrowth can reabsorb the excess emissions are incompatible with the urgency of reducing emissions to comply with the objectives enshrined in the Paris Agreement.

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ATTENTION!

"...The UNFCCC accounting rules already mentioned allowing an importing country to count emissions from biomass as zero, are based on the assumption that reductions in forest biomass are accounted in the exporting country's LULUCF statistics. Since implementation and verification of the latter vary considerably between countries, the trade-off between reductions in carbon stock and emissions into the atmosphere at the point of combustion lacks transparency. Emissions reporting can thus be highly misleading since the importing country will record biomass emissions as zero and as reducing its national emissions inventory, even though the net effect of switching from coal to biomass pellets may be to increase atmospheric CO2 levels for decades..."

"...The IPCC accounting rules aggregating all forestry-related emissions to the LULUCF category have created a reward for countries importing biomass since, even though overall emissions are likely to have increased as a result of switching from coal to imported biomass, the country can count them as zero and report a reduction. Considerable economic assets are now locked into the converted coal-fired power stations, the transport infrastructure and the forest biomass supply chain which could be stranded if the simplistic assumption of carbon neutrality was corrected..."

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EU Biomass Legal Case Main Arguments

[2019-08-00-eu-biomass-legal-case-main-arguments-english.pdf](#)

This legal document contains the main arguments in the EU Biomass Legal Case where the applicants seek annulment of the inclusion of "forest biomass" – essentially trees, including, stems, stumps, branches and bark – as a renewable fuel within the Renewable Energy Directive (recast) 2018.

"...The claim that the GHG criteria, the Sustainability criteria, and the LULUCF criteria ensure that biomass burned for energy reduces emissions relative to fossil fuels is simply wrong.

As a result it undermines its own purpose of reducing GHG emissions, violates the treaty obligations and infringes the fundamental rights of humanity.

We are analyzing reports and creating & posting new summaries every day. This is time consuming work but we will try to deliver multiple summaries per day. We are currently processing reports from 2019 and will work our way back into the [hundreds of official research reports commissioned the last decade.](#)

"...LULUCF for biomass qualification criteria are far too weak to protect against the harms to forests that are allowable under the sustainability criteria or to justify the zero-rating of biogenic emissions for forest biomass under the GHG criteria..."

It follows from the fact that biomass can comply with the LULUCF criteria merely by coming from a country that is a party to the Paris Agreement. This is an exceptionally weak requirement which includes all biomass sourced from any of the 184 countries who have (to date) ratified the Paris Agreement, without even any requirement that the party in question is complying with its Paris Agreement obligations. The requirement that the source country has an accounting system in place covering emissions and removals from forestry... is insufficient to compensate for the inadequacies of the GHG and sustainability criteria. The LULUCF requirement simply assesses the balance of forest carbon stocks at the national level. A requirement that LULUCF sector emissions do not exceed removals does not ensure that any particular forest site will be protected or regrown.

"...The LULUCF criteria which assume the application of the LULUCF Regulation in EU Member States, represent an attempt to balance of GHG emissions and removals nationally, and reflect necessary compromise with administrative practicality. The approach is not a perfect reflection of emissions that actually occur when forest wood is harvested and burned. Thus, the Directive wrongly treats the LULUCF criteria as a protective justification for the zero-rating of forest biomass emissions..."

"...the new LULUCF Regulation does not perfectly account for forest carbon losses due to biomass burning. However, even if it did, this would not resolve the incompatibility of the goals of building the forest carbon sink for climate change mitigation, and authorizing member states to provide incentives for biomass burning, thus encouraging transfer of forest carbon to the atmosphere..."

"...EU Member States are not free to adopt more onerous criteria or insist that only the most onerous criterion it sets out be used. This means that the EU has outsourced oversight of the accounting of emissions from biomass to source countries, including those outside the EU, without mandating any requirement for carbon stocks to be maintained or increased. Further, as explained above, even if the LULUCF criteria required carbon stocks to be maintained, this still would not ensure that forest biomass delivers carbon savings relative to fossil fuels..."

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Sustainable Biomass for the Production of Hydrogen

[2019-06-23-wageningen-university-research-duurzame-biomassa-voor-de-productie-van-waterstof-dutch.pdf](#)

This report discusses the burning of woody biomass to generate electricity to be used for the production of hydrogen.

"..The arguments of the proponents and opponents [of burning woody biomass] have to do with the:

- CO₂ and energy balance in the chain and the moment at which you measure the carbon stock;*
- biomass additional growth in relation to consumption and the effects of harvest on the landscape and the ecosystem;*
- guaranteeing sustainability through an administrative system of certification;*
- market forces and market failures, due to the exploitation of subsidies (level playing field) and the absence of a CO₂-related market mechanism;.."*

"...[proposed] requirements for the various parties in the chain:

The use of biomass must lead to a substantial reduction in greenhouse gas emissions, calculated over the entire chain. The calculated reduction in greenhouse gas emissions must be at least 70% relative to the reference value for fossil fuels.

- production of raw biomass must not lead to destruction of carbon reservoirs.*
- biomass production may not lead to long-term carbon debt.*
- biomass production must not lead to indirect land use change (ILUC) with a negative impact on carbon capture.*
- relevant international, national and regional / local laws and regulations are followed.*
- biodiversity must be preserved and, where possible, strengthened.*
- the production capacity of each forest type must be maintained.*
- forest management contributes to local economy and employment.*
- sustainable forest management is realized on the basis of a management system..."*

"... if nature areas are converted for the production of biomass, this will have serious negative effects on biodiversity in the short term (direct effects) ... With these kind of conversions, it can take centuries for the effects of land use change on biodiversity to be restored..."

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Assessment for the National Forestry Accounting Plans
[2019-06-18-european-commission-staff-working-document-assessment-for-the-national-forestry-accounting-plans-english.pdf](#)

This report is commissioned by the European Commission and contains an assessment for the national forestry accounting plans.

"...Member States should ensure that sinks and reservoirs, including forests, are conserved or enhanced with a view to meeting the ambitious greenhouse gas emissions reduction targets of the Union by 2030 and strategies to reduce emissions to net zero by 2050, in line with the Paris Agreement..."

"...To help achieve these goals, the LULUCF Regulation sets out a robust accounting system. This Regulation sets a binding commitment for each Member State to ensure that accounted emissions from land use are at least compensated by an equivalent removal of CO₂ from the atmosphere through action in the sector. This is known as the 'no debit' rule..."

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