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## **Polish forests must be protected, not incentivised as a source of fuel**

For the sake of policy cohesion between the EU's climate and biodiversity commitments and goals, we strongly urge that the burning of forest biomass be removed as a source of "renewable" energy from the Renewable Energy Directive. Our forests must be protected, not incentivised in renewable energy targets as a source of energy.

Poland is home to some of the most intact forests in Europe of which a great majority (around 75%) are managed by Poland's State Forests Holding, a public institution. Unfortunately, **as a consequence of a mixture of threats including the growing economic pressure from logging, flawed regulations and weak civil and institutional governance and supervision, as well because of strong lobbying from vested timber company interest groups, the survival of some of the most natural of them is seriously threatened.**

The Polish legal system does not assure citizens access to justice in the process of forest management planning. Even if management plans break national or European regulations no legal avenues are available for upholding the rule of law in the courts. Incredibly, in a place like the EU where freedom of expression is a right, virtually no remarks postulating pro-environmental modifications of forestry activities are accepted by the authorities with processes of "public consultations" regarding forest management plans being pure fiction. Furthermore, Polish law exempts so-called "rational forest management" from adhering to prohibitions concerning strict species protection. Both the lack of access to justice and exempting forestry from strict protection were the subjects of an intervention of the European Commission that eventually, on 3.12.2020, referred the case to the European Court of Justice. This has led to a situation where some of Poland's most valuable forests, such as those in the Carpathians, the Borecka Forest and the Białowieża Forest, are being gradually degraded as a result

of continuous logging and the social side has no tools to resist this process. **One of the main reasons for the increased pressure on these forests is that the amount of timber harvested in Poland has more than doubled over the past 30 years. Increased demand for energy wood would further reinforce this negative trend.**

The strategies which are being instituted at the moment on the EU level (European Green New Deal, Biodiversity Strategy to 2030, Forest Strategy post 2020) give hope that, finally, Poland's irreplaceable natural forests will finally be protected. The plans to strictly protect 10% of the land including all primary and old-growth forests are opposed in Poland by a strong forestry lobby, which makes unsubstantiated claims that such plans will result in reduction of extracted wood volumes in Poland by 40%. The argument is used to set the wood industry against the key biodiversity goals of the EU of strictly protecting forests, including here in Poland. **It is therefore extremely important to take all the necessary actions to reduce demand for wood and thus relieve Polish forests from some of the pressure.**

Stopping subsidies and any other incentives for burning forest biomass in power and heating plants is hence an extremely important measure, both economically and politically, to reduce the logging pressures on forests and allow for the protection of natural forests in Poland. A proof that the Polish government is seriously considering massive expansion in the use of forest biomass as an energy source is the fact that in October 2020 an amendment to the Polish RES Act came into force. The amendment broadened the definition of energy wood thus allowing burning deadwood and dead and decaying trees extracted from forests for bioenergy. It must be noted that removing bark-beetle infested trees was among the excuses for the illegal heavy logging in the Białowieża Forest in 2017. Previously worthless from an economic point of view, such wood now gained commercial value as a fuel which may result in a new wave of logging throughout the country.

The new definition of "energy wood" has been allegedly introduced to recoup Poland's State Forests loss in wood sales as a result of the coronavirus pandemic. An estimated 2 million cubic meters of wood (~5,6 TWh) might be used as a biomass simply as a result of the change in the definition. Though the introduced change is supposed to be temporary (from 1.10.2020 to 21.12.2021), there is a danger that it will be extended if state forests find that it brings significant profits. It is even more alarming in light of Polish climate and energy policy. **According to Poland's National Energy and Climate Plan (NECP), Poland plans to increase its overall bioenergy use by 45% between 2020 and 2030 (from 11.1 TWh to 15.5 TWh), reaching 16.1 TWh in 2040. Projections show that the use of biomass is expected to rise by 21% (from 9,6 TWh to 11,6 TWh).** However, looking only at figures for electricity generation from biomass, the projected increase in biomass will be much larger and may reach a staggering 66%.

Biomass will be used to replace coal in existing CHP plants, helping to achieve RES targets in the heating/cooling sector, currently expected to increase (RES) by 1.1% year-to-year between 2020 and 2030 (reaching 28.4% in 2030).

The recent Joint Research Centre's study into the use of woody biomass in the EU found that almost all forest biomass use scenarios (23 out of 24 scenarios assessed by the study) lead to negative outcomes for biodiversity and the climate. The scientific world has repeatedly voiced its opposition to the burning of forest biomass, an example being a letter from 800 scientists sent to the European Parliament in 2018. Looking through the perspective of scientific knowledge, it is clear that forest biomass production in Poland is a dead-end road, both in terms of climate and biodiversity, so recent developments regarding the development of its production are extremely worrying.

According to a research done by the Polish Smog Alert (PAS) **even 9 million tonnes of firewood may be burnt annually in Poland. According to the latest EIA report on air quality, Poland is the EU leader in terms of carcinogenic BaP pollution, one of the major sources of which is wood burning.** This trend must be reversed. Better housing insulation coupled with heating sourced from low emissions technologies not forest biomass should be the first priority for subsidies.

In this regard burning biomass must be phased out, not supported through EU policies.

On behalf of the undersigned organisations:

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chairman of Stowarzyszenie Pracownia na rzecz Wszystkich Istot

**PREZES PNRWI**

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## Signatories

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**Maciej Wereszczyński**, energy and climate campaigns coordinator  
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**Krzysztof Gorczyca**, chairman of Towarzystwo dla Natury i Człowieka

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