



Subject: Your vote on the Renewable Energy Directive (RED III):

Burning biomass is not healthy

Berlin, 8 July 2022

Dear member of the ITRE-committee,

Next week you will vote on RED III and whether wood burning should continue to be classified as "renewable" and subsidised. Your vote will have implications not only how the EU will tackle climate change and the preservation of our forests, but also on the air quality in Europe, on which our health depends quite decisively.

Air quality is the greatest environmental risk to human health in Europe and worldwide. In 2019, 307,000 people in Europe alone died prematurely from exposure to particulate matter in the PM2.5 category. (1)

For the World Health Organization (WHO), air pollution is now one of the key risk factors for the increase in cardiovascular and respiratory diseases, as well as many types of cancer, such as lung, breast and colon cancer, in addition to alcohol and tobacco consumption, poor nutrition, and insufficient exercise (2). Furthermore, new studies link particulate matter also to diseases such as diabetes, obesity, and neurodegenerative diseases including Alzheimer's and Parkinson's (3,4). These chronic diseases cause not only untold suffering, but also enormous costs to the health care system.

Burning of fossil fuels is indeed a major common cause of air pollution and of the climate crisis. However, due to the promotion of wood as an energy source, the burning of wood, in addition to the burning of fossil fuels, is also becoming an ever greater threat to the climate and health, because the burning of wood also produces the greenhouse gas CO₂ and air pollutants such as particulate matter. This applies not only to combustion in power plants, but also to combustion in wood heaters and in fireplaces in private households.

Moreover, wood is too valuable a raw material to be burned on a large scale and should be used sparingly and for long-lasting products, e.g. in construction. Burning wood is not climate-neutral, as trees take decades to recapture the CO₂ released. In addition, the thermal use of wood increases demand and thus utilization pressure on forests that are already overexploited, and weakened by climate change and air pollutants.

The Clean Air Working Group at KLUG (German Alliance on Climate Change and Health) addresses the links between air pollution, climate change, and health and has published a position paper ([Positionspapier](#)) on this topic. We emphasize that many measures for clean air help at the same time to combat global warming and environmental pollution and thus have further positive effects (co-benefits) on health.

To protect health and the climate, fossil fuels must not be replaced by wood. Especially in the current political situation, in which Europe needs to become independent of fossil fuels particularly quickly, the wrong promotion by the RED threatens an increase of wood-fired power plants and of wood heating in households and thus further pollution of the air, destruction of forests and fuelling the climate crisis.

The energy poverty in some European countries, but also the general perception that wood burning is sustainable, have led to an increase of fireplaces in private homes for several years. These pollute the air not only with particulate matter, but also with carcinogenic substances in particular, which makes emissions from fireplaces particularly harmful to health. In Germany, for example, about 90% of all emissions of polycyclic aromatic hydrocarbons come from private households. (Figures from the German Federal Environment Agency). In Europe, wood-based home appliances are responsible for 12,6 billion euros of health-related costs. (5)

As the Clean Air Working Group at KLUG and the undersigning health organisations HEAL, EPHA, DGPH and ClientEarth, we therefore call on you to no longer classify wood as a renewable energy source in the new RED III and to stop subsidies for wood as an energy source. Wood burning in power plants, heaters and fireplaces pollutes air, contributes to the climate crisis, and is therefore harmful to health in several ways.

Yours sincerely,



Dr. Anja Behrens

Spokeswomen for the Clean Air Working Group at KLUG

Signatories:

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Sources:

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2. Weltgesundheitsorganisation, Regionalbüro Europa 2019: <https://bit.ly/3f4q4Zd>
3. <https://www.mdpi.com/1660-4601/15/8/1704>
4. [https://www.thelancet.com/journals/lanpla/article/PIIS2542-5196\(18\)30140-2/fulltext](https://www.thelancet.com/journals/lanpla/article/PIIS2542-5196(18)30140-2/fulltext)
5. <https://epha.org/replacing-fossil-fuels-and-biomass-with-cleaner-alternatives-in-residential-heating-and-cooking/>