

European Commission
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Svebio position on the Post-2030 Renewable energy framework – Public consultation

Swedish Bioenergy – Svebio – represents around 250 companies that produce, distribute, sell and store bioenergy. Our goal is to develop the bioenergy sector – for the benefit of all, based on knowledge, an overall view of the energy system and in cooperation with our environment. Svebio's members come from the district heating and combined heat and power sector, biorefineries, biofuel producers, farmers and forest owners, technology suppliers, academia, researchers, and consultants.

Svebio will also respond to the Commission's questionnaire linked to the consultation.

Summary

- *In 2025, bioenergy accounted for 37 percent of total energy use (including heating, biogas, biofuels, and electricity) in Sweden. The predominantly biofuel-based district heating and combined heat and power (CHP) sector supplies half of the country's heating in residential buildings and industry (90 percent in multi-family residential buildings) and one-tenth of electricity production.*
- *Bioenergy is based on residual products from forestry (i.e. tree tops and branches) and the forest industry (such as sawdust and other by-products), as well as biogenic waste such as demolition and waste wood.*
- *Roughly 70 percent of Sweden's land area is covered by forest and Sweden has just over 330.000 forest owners, and approximately 70 percent of the country's farmers own forest land.*
- *Any restriction on the ability to use biomass creates challenges for the bioenergy sector, reducing Sweden's energy security and weakening the economic conditions for agriculture and forestry.*

- *Sweden has a lower average temperature than most other EU Member States and therefore requires favorable conditions for the biomass-based heating in both residential buildings and industry.*
- *Sweden also has a long-standing tradition of sustainable forestry based on extensive replanting after harvesting.*
- *For these reasons, there should be scope for exemptions from the strict framework currently applied under Fit for 55 in general, and the Renewable Energy Directive (RED) in particular. The regulatory framework should be applicable in a way that reflects Nordic conditions. Several of the requirements introduced under RED are clearly not designed for Nordic conditions. Prioritizing biodiversity, protecting wetlands, and safeguarding conservation-worthy forests have shaped Swedish forestry for generations.*
- *Future policy instruments should aim to enable this balance. This requires that an expansion of fossil-free energy supply is matched by the development of demand and by adequate system flexibility. Such an approach is necessary to reduce dependence on fossil fuels and to strengthen Europe's competitiveness and resilience. Today, more permits and certificates are required to start and operate bioenergy production than to run oil refineries.*
- *As RED III has only recently entered into force, the review of the post-2030 renewable energy framework should prioritize regulatory stability, simplification, and enhanced coherence. Before initiating any amendments, the Commission should ensure that implementation has stabilized and that the effects of RED III on markets, investment conditions, and the functioning of the internal market have been assessed.*
- *Effective implementation of the existing regulatory framework and a stable regulatory environment are crucial for achieving the 2030 targets. This is particularly important given that a majority of Member States did not meet the deadline for transposing RED III into national law.*
- *In Sweden, the sustainability criteria are embedded in well-functioning national legislation and form the basis for the extensive use of sustainable bioenergy in district heating and combined heat and power. The existing sustainability criteria for biofuels and biomass are therefore considered fit for purpose and should not be reopened for renegotiation.*
- *Svebio also believes that the cascade principle should follow market-economic principles: the actor willing to pay the highest price for the biomass should receive the raw material. The market is best suited to handle this and does not need to be regulated through directives or other legislation. However, we should continue to avoid state aid that distorts competition in this area.*

Bioenergy and forestry are essential for Sweden

- Bioenergy

Bioenergy's importance has increased over the past 40 years. Today it accounts for roughly 37 percent (including heating, biogas, biofuels, and electricity) of total energy use in Sweden, of which forest-based bioenergy represents around 80 percent, primarily in the form of residual and by-products from

forestry and the forest industry. The predominantly biofuel-based district heating and combined heat and power (CHP) sector supplies half of the country's heating in residential buildings and industry (90 percent in multi-family residential buildings) and one-tenth of electricity production.

The need to protect and strengthen the forest's biological diversity is significant. If changes in forestry practices—introduced to safeguard biodiversity—lead to reduced harvesting volumes, the availability of the biomass typically used for energy purposes will also decline. There remains strong potential to increase forestry's contribution to the energy supply even after accounting for biodiversity considerations.

In times of risk and uncertainty, bioenergy serves as a potential substitute for—and complement to—other energy sources. Maintaining and developing bioenergy production and value chains is therefore a matter of energy security. In this context, biofuels take on particular importance. For long-distance aviation and maritime transport, as well as for road vehicles in areas with limited charging infrastructure, biofuels are likely to remain important in the coming decades.

The climate benefits of bioenergy are also determined by the substitution effect (the emissions avoided when fossil fuels are not used) and by how carbon storage in vegetation, soils, and biobased products is affected when biomass is used for energy purposes.

The forest industry's residues and by-products are today used almost exclusively for energy production. However, this may change in the near future as demand increases for biobased raw materials to produce, for example, bioplastics, new textile fibres, and materials with a high substitution effect such as construction materials.

Long-lived wood-based products have the advantage of storing carbon outside the atmosphere for longer periods than biofuels, but total carbon storage may either increase or decrease when forestry practices and biomass use change in response to rising demand for bioenergy.

Biogenic carbon dioxide captured from flue gases—for example in the pulp and paper industry or in combined heat and power plants—can be stored in geological formations or used to produce new products. Together with increased reuse and recycling, this can further contribute to limiting global warming.

- *Forestry*

Sweden is highly dependent on its forest industry. The sector's value-added amounts to approximately SEK 150 billion¹ per year. For every SEK of value added generated within the forest sector, an additional SEK 1.3 is generated in other industries. The export value of forest products amounts to around SEK 185 billion.

Roughly 70 percent of Sweden's land area is covered by forest. Approximately 140.000 people are employed directly or indirectly within the forest industry's value chain and there are more than 330.000

¹ 1 SEK = 0,09 EUR

forest owners. Approximately 70 percent of Swedish farmers' own forest. A reduction of the possibilities to harvest forest, due to new regulations, would harm food production as well.

A normal year sees approximately 80–90 million cubic meters of forest harvested, after which the area is replanted (around 400 million new tree plants annually). Estimates show that a reduction of 5 million cubic meters would have resulted in a total loss of SEK 8 billion in value added and put 7.200 jobs at risk.

Reduced availability of raw materials affects the entire value chain. It would lead to fewer jobs and lower levels of investment in the development of new sustainable products for the future. It would also diminish the economic value of Swedish forests and reduce the degree of value creation.

- *Nordic conditions*

Svebio shares the Commission's ambition to protect endangered species and safeguard sensitive natural areas. However, the criteria and provisions set out in RED do not appear to be adapted to Nordic conditions. Sweden is a cold country with substantial heating needs. The country's annual average temperature is 5°C, but winter temperatures are significantly lower — around –1°C in southern Sweden, approximately –4°C in central Sweden, and between –10°C and –15°C in northern Sweden.

The specific conditions that exist in Sweden must be taken into account. Bioenergy has a long tradition, closely linked to sustainable forestry that is based on careful forest management and stewardship across generations. Already today, 25 percent of Sweden's forests are protected from logging, including in national parks, nature reserves and Natura 2000 areas.

Alongside bioenergy's importance for heating, it also plays a significant role in the transport sector. Today, biofuels account for almost 20 percent of the road transport fuel mix, and their use is increasing in aviation and shipping. The recent instability in Ukraine and the Middle East has shown how vulnerable Europe is when it comes to fuel security. Making it more difficult to produce biofuels would be devastating.

Svebio also supports the Commission's objective of increasing electrification. This is necessary to meet the climate targets. However, the electrification of heavy vehicles such as trucks, construction machinery, and forestry and agricultural machines will take time. In addition, forestry and agricultural machines need to be as light as possible to minimise soil damage. When it comes to the aviation and maritime sectors, electrification lies far into the future. Here, biofuels offer an appropriate and cost-effective solution that can reduce oil dependence on Russia and countries in the Middle East.

To further increase the availability of biomass, the Commission should abandon its negative stance on crop-based bioenergy. There are large areas of underutilised agricultural land that can be used to grow energy crops. This is necessary in order to produce more sustainable fuels for road transport, aviation and shipping, and to meet the climate targets.

Simplification must be prioritized

The revised Renewable Energy Directive (RED III) has been effective for two years, but has only been implemented in a few Member States. In Sweden since February 2026.

For the post-2030 framework, it is essential that fossil-free energy supply and electricity demand develop broadly in parallel. Taking into account that the RED III was recently implemented, the review of the post-2030 renewable energy framework should prioritize regulatory stability, simplification and coherence. Before initiating any revisions, the Commission should allow sufficient time to stabilize implementation and evaluate the effects of RED III on markets, investment conditions and the functioning of the internal market. In the current geopolitical context, policy predictability is also a prerequisite for maintaining and scaling dispatchable renewable energy and strengthening Europe's security of supply. Against this background, it is of utmost importance to recognize the role of mature and well-functioning RES and bioenergy systems in Member States in the Nordic-Baltic region.

To provide regulatory stability and enhance investment certainty, RED should build on existing achievements without reopening well-functioning parts of the legal framework, and instead focus on fine-tuning rules, strengthening implementation and enabling faster more cost-efficient renewable rollout across the EU.

A systemic approach to energy security

The renewable energy framework for the Post-2030 period must adopt a more systemic perspective. In light of increasing geopolitical volatility, the EU needs to expand its renewable energy capacity and reinforce its energy independence through a reliable, domestically anchored, affordable, and fully decarbonised energy system.

Sustainable bioenergy remains a foundational pillar of this transition. As a flexible and dispatchable resource, it provides essential system stability. Weakening its role risks undermining hard-won decarbonisation achievements, driving up costs, and reducing overall system reliability. The post-2030 framework must therefore continue to recognise sustainable biomass as a strategic enabler of sector integration and a key pathway for decarbonising the EU energy system.

Legislative harmonisation and reduced administrative burden

To improve effectiveness and reduce administrative complexity, the EU must harmonise overlapping legislation—particularly the Renewable Energy Directive, the Emissions Trading System (EU ETS), and the Taxonomy Regulation. Today, operators face conflicting definitions, duplicative documentation, and divergent verification systems.

Aligning criteria, terminology, and documentation requirements across the renewable energy framework would reduce bureaucracy while strengthening compliance and transparency. To ensure a stable investment environment, Svebio recommends:

- Flexible biomass allocation — Avoid rigid cascading rules and support market-based allocation that reflects regional conditions, industrial structures, and optimal climate outcomes.
- Predictable sustainability criteria — Maintain the existing sustainability framework, which effectively safeguards climate and biodiversity outcomes while preventing carbon debt. These criteria should be extended to non-energy uses to ensure a level playing field.

Several proposals within the Fit for 55 package reflect a persistently negative stance toward bioenergy. This includes:

- EU Forest Strategy and LULUCF impacts — Reduced harvesting and lower production of forest raw materials diminish the availability of biomass, including residues and industrial by-products.
- Energy Taxation Directive revision — Introducing minimum tax rates on biofuels for transport and heating, without justification, places bioenergy at a disadvantage compared with other renewables and undermines fossil-fuel substitution.
- Transport emissions regulation — A strict zero-tailpipe approach effectively removes the market for biofuels, including biogas, for affected vehicle categories.

A similar negative trend is evident in the latest revision of RED III, which introduces new barriers to mobilising forest biomass and continues to restrict agricultural biomass use. This limits bioenergy's contribution to the climate transition, resulting in higher fossil emissions and increased transition costs.

For Sweden, defending the sustainable use of bioenergy—from both forests and agricultural land—is essential. Bioenergy is the country's largest energy source, and domestic production could potentially double. As a homegrown resource, it reduces dependence on imported energy—particularly relevant given high fossil fuel prices and restrictions on imports from Russia.

Bioenergy is therefore a critical component of strengthened energy security and should not be subjected to additional EU-level restrictions.

The existing sustainability criterias for biofuels and biomass should not be reopened

The regulatory framework affecting bioenergy needs better alignment. Biofuels and biomass are subject to multiple directives, including the RED and the Energy Efficiency Directive. Overlapping obligations should be addressed to improve clarity and reduce complexity, particularly for district heating and CHP operators.

Today, fewer permits are required to import crude oil and produce diesel and petrol than to purchase and produce bioenergy. Due to requirements such as sustainability declarations, companies in the district heating sector have faced long processing times, uncertainty and increased costs that have ultimately affected customers. This must change.

The existing sustainability criteria for biofuels and biomass should not be reopened. Reopening the criteria would increase uncertainty, create investment risk, and could unintentionally constrain an important domestic energy source that contributes to system flexibility and security of supply. Policy efforts should instead focus on effective application of existing rules whilst recognizing differences between local and regional prerequisites.

The use of biomass is the backbone of regional bioeconomy clusters. What may be regarded as efficient or optimal use of biomass depends on local and regional conditions, such as the regional energy system, existing industries, available biomass resources use and infrastructure. Extraction and transport of biomass are generally high in relation to other energy sources and hence local utilization and upgrading is preferred. It is of utmost importance that EU Policies recognize regional diversity and support efficient biomass use based on regionally rooted value networks as intended in the European Bioeconomy Strategy.

Sustainable bioenergy in District Heating and Combined Heat and Power (CHP) play a critical role in energy efficiency, system flexibility and security of supply. A predictable and coherent EU framework is therefore essential to safeguard these contributions and support a resilient energy system. It is also essential to include common definitions and sustainability principles to avoid fragmentation and competitive distortions.

Simplification should strive to implementation that is proportionate and risk-based, reducing administrative burden while maintaining harmonized EU outcomes. Where robust national frameworks already exist, reporting and verification should be simplified and duplication avoided, for example through greater reliance on established national systems and mutual trust in competent authorities.

This approach supports a level playing field in the internal market while ensuring regulation remains targeted and effective.

To further regulate the cascading principle is unnecessary

Since bioenergy consists mainly of low-value residual streams (such as bark, sawdust, black liquor, branches and tree tops) generated in the production of high-value products (such as pulp, paper, board and sawn timber), bioenergy accounts for only a very small share of the forest industry's total value added. Bioenergy is often sold at low margins and is also used internally in mills for energy and steam.

The raw materials for bioenergy are estimated to represent less than 5 percent of the forest industry's total value added. Further regulating the cascade principle therefore appears both unnecessary and unreasonable.



Instead, the cascade principle should follow market-economic principles: the actor willing to pay the highest price for the biomass should receive the raw material. The market is best suited to handle this and does not need to be regulated through directives or other legislation. However, we should continue to avoid state aid that distorts competition in this area.

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