

## Revision of the Renewable Energy Directive

Green Transition Denmark (GTD) appreciates the opportunity to provide evidence regarding the revision of the Renewable Energy Directive (RED).

GTF generally is in favor of keeping the Renewable-only Energy Directive as a backbone of the post-2030 Energy Union, with a binding EU renewable-only 2040 target to rapidly reduce dependency on energy imports and meet climate commitments.

The RED's sectoral architecture should be preserved, including sectoral targets across transport, industry, heating and cooling, and buildings, to maintain clear decarbonisation pathways and strong demand signals.

GTD wants to stress the need for two priority amendments – and hence the Impact Assessment underpinning the revision:

Climate impact of bioenergy: Burning of biomass emits significant amounts of CO<sub>2</sub>. The net climate impact is still being discussed but is certainly far from zero – in particular from burning of wood. Hence continued use of wood conflicts with the EU 2050 target of net-zero emissions and should no longer be encouraged with economic incentives.

Firstly, revision of RED must ban future direct and indirect subsidies for wood used for energy. The widespread exemption of wood-energy from national greenhouse gas and energy taxes constitute important indirect subsidies.

Secondly, use of woody biomass for energy must be included in the ETS1 with an appropriate emission factor for users above 20 MW thermal. ETS2 could cover commercially traded wood for energy. This would extend the Polluters Pay Principle to bioenergy.

Thirdly, biomass energy continued use of biomass for energy must respect RED sustainability criteria.

Direct and indirect subsidies for biomass energy distort investments in renewables away from truly carbon neutral solar and wind. They also contribute significantly to the continued decline in the EU carbon sink.

### **In regards to the Transport part:**

The contribution from renewable electricity as a transport fuel for all transport modes should be maximized. Sustainable liquid fuels for aviation and shipping should retain focus.

The current crediting mechanism should be retained and expanded, making it mandatory for Member States to include it to all transport modes.

First generation food and feed crops as feedstocks should be phased out to prevent competition with food security and land use change impacts, and to ensure regulatory consistency with the aviation, shipping, and cars CO<sub>2</sub> regulations.

EU should strengthen safeguards on problematic feedstocks in Annex IX to ensure only truly sustainable and low fraud risk feedstocks are incentivised.

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Renewable hydrogen and e-fuels should be prioritized for aviation and shipping only through a binding RFNBO target for those sectors, and exclude low-carbon hydrogen from counting toward renewable transport targets.