EuLA Feedback on the Renewable Energy Framework post-2030 call for evidence: Biomass considerations for hard-to-abate sectors

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EuLA, the European Lime Association, represents European non-captive lime production through its 24 covered Member States (companies & national associations). Lime is one of the essential building blocks of modern industry. It is used in many essential processes, such as making construction buildings, producing iron and steel, treating contaminated land, purifying drinking water, making sugar and even cleaning gases from powers stations. Lime and its derivatives are also important additives for making paper, glass, and agricultural products.

The European Lime Association (EuLA) welcomes the opportunity to contribute to the European Commission's Call for Evidence on the Renewable Energy Framework for the period post-2030. 69% of total emissions in the lime sector are process-related and result from the chemical decomposition of calcium carbonate. This means that the industry relies on a combination of solutions to decarbonise, including fuel switching, carbon capture technologies, and the sustainable use of biomass. In fact, biomass already plays a critical role in reducing emissions from lime production and will remain an essential component of the transition.

To ensure that renewable energy policy effectively supports industrial decarbonisation while maintaining competitiveness, the future framework must provide flexibility and long-term certainty regarding biomass use.

Summary of Key Messages

- **Avoid geographic restrictions** on biomass sourcing and maintain access to global sustainable biomass markets
- **Ensure long-term regulatory stability** to enable investment in biomass-based decarbonisation solutions
- **Harmonise biomass definitions and sustainability criteria** across RED, EU ETS, and carbon removal frameworks
- **Safeguard access to waste-based biomass**, including waste wood, as a key circular and low-carbon resource.
- **Build on existing sustainability criteria** and avoid introducing unnecessary additional constraints

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Key Messages

1. Avoid Restricting Biomass to "Homegrown" Sources

The future renewable energy framework should not limit biomass sourcing to domestic or "homegrown" EU resources. Sustainability criteria already govern biomass use, including lifecycle emissions and transport-related impacts. Therefore, this measure would be redundant and would complicate the supply of biomass to industry. Introducing geographic restrictions would:

- Artificially constrain supply,
- Increase costs for industry,
- Undermine the competitiveness of EU manufacturing sectors.

An open and well-regulated global sustainable biomass market is essential to ensure sufficient availability and cost-effectiveness for industrial users.

2. Ensure Long-Term Stability of the Biomass Regulatory Framework

Investment decisions in industrial decarbonisation require predictable and stable regulatory conditions. Frequent changes or uncertainty in biomass eligibility rules risk delaying or deterring investments in:

- Fuel switching infrastructure,
- Biomass supply chains,
- Hybrid decarbonisation solutions.

The EU framework should therefore provide:

- Long-term visibility on sustainability criteria,
- Regulatory stability across policy cycles,
- Clear guidance on the role of biomass in achieving climate targets.

3. Harmonise Biomass Definitions Across EU Legislation

A major barrier to effective deployment of biomass is the lack of alignment across EU regulatory frameworks. Currently, different definitions and criteria apply under:

- The Renewable Energy Directive (RED),
- The EU Emissions Trading System (ETS),
- Carbon removal and BECCS-related frameworks.

This fragmentation creates uncertainty and inefficiencies for industry. The Commission should ensure a harmonised definition of sustainable biomass, that is consistent with sustainability criteria and aligned with accounting methodologies and treatment of emissions. This coherence is essential to avoid regulatory contradictions and to enable integrated decarbonisation strategies in the long-term.

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4. Safeguard the Use of Waste-Based Biomass

Waste-derived biomass, including waste wood, is a key resource for industrial decarbonisation and circular economy objectives. The future framework should explicitly ensure that:

- Waste wood remains an eligible fuel,
- Its use is not unintentionally restricted by evolving sustainability criteria,
- Regulatory conditions support its continued and increased utilisation.

Restricting access to such resources would undermine both climate and circular economy goals.

5. Build on Existing Sustainability Criteria Rather Than Adding New Constraints

The EU already has robust sustainability criteria for biomass use. These frameworks account for lifecycle emissions, land use considerations and transport impacts. Rather than introducing additional and often redundant layers of restriction, the focus should be on:

- Effective implementation,
- Streamlining existing rules,
- Ensuring consistency across policy instruments.

This will reduce administrative burden and improve policy effectiveness.

Conclusion

To support the EU's 2040 climate targets and ensure industrial competitiveness, the post-2030 Renewable Energy Framework must:

- Maintain open and flexible biomass sourcing,
- Provide long-term regulatory certainty,
- Ensure coherence across EU legislation,
- Safeguard access to waste-based biomass,
- Build on existing sustainability frameworks without unnecessary additional constraints.

For hard to abate sectors such as lime, biomass is not a standalone solution but part of a broader decarbonisation pathway. Given the inherent process emissions in lime production, maintaining access to sustainable biomass is essential to achieve climate objectives.

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