



European
Landowners'
Organization

ELO hopes the new EU Bioeconomy Strategy sets a turn point for faster decarbonisation

Brussels, 28 November 2025 — The European Landowners' Organization (ELO) welcomes the publication of the new *Strategic Framework for a Competitive and Sustainable EU Bioeconomy* and a **clearer recognition that agriculture and forestry are central to Europe's shift away from fossil-based products.**

As Europe faces growing climate, energy, and competitiveness pressures, the **bioeconomy represents one of the continent's most strategic opportunities, provided that farmers, foresters, and landowners are genuinely empowered to drive this transformation.** To achieve this, the EU must remove long-standing obstacles to innovation and investment, from biocontrols to biobased chemicals and advanced biofuels. The new framework must simplify procedures, cut red tape, and ensure fair returns for primary producers.

While circularity is crucial, primary biomass remains indispensable for decarbonisation. Delivering Europe's transition will require all sustainable options: bio-based materials, renewable energy from biomass, biomanufacturing, biocontrol solutions, nutrient recycling, and innovative value chains that generate new income streams and rural jobs. This will in turn provide more investment and dynamism to help land-based sectors adapting to unprecedented pressures.

ELO warns against policy interpretations that **unintentionally undermine the viability of sustainable land management**, including overly rigid applications of the cascading principle and strict criteria. Landowners need flexibility to choose the most practical, sustainable, and economically viable pathways for their biomass. Limiting options through prescriptive rules risks discouraging active management, harming rural economies, and weakening Europe's ability to have a transformative and leading role in the bioeconomy. The focus should be on expanding their toolbox and **not prioritising monitoring tools alone.** Primary sectors need to be fully involved in its implementation, risk assessments, and regulatory design of such tools, a role in which their contribution is still too often overlooked.

ELO stands **ready to support policymakers in delivering the Strategy** and to contribute actively to the planned Stakeholders' Platform to ensure that the Strategy becomes an engine of rural prosperity, innovation, and long-term European resilience, while finally rewarding those who sustainably manage Europe's natural resources.

BIOECONOMY

ELO welcomes recognition of agriculture and forestry as strategic sectors in the future EU Bioeconomy Strategy. These sectors are essential for scaling up the circular bioeconomy and should benefit fully from its opportunities. The bioeconomy can deliver new opportunities for agriculture, forestry, and the entire food system, especially in rural areas. We believe that Bio-based solutions, biomanufacturing, and innovation can drive the transition to a new bio-based economy, creating new income sources, value chains, and business models for European farmers and foresters. However, to realise these opportunities, we must enable these opportunities and enhance growth, competitiveness, and rural development. We consider the bioeconomy **as a way to contribute to the effort to replace fossil-based materials with sustainable, renewable alternatives**. We believe this is a good strategic approach to promoting key markets and supporting **the scale-up of innovative solutions, while recognising the vital role of primary producers and removing existing market barriers and regulatory complexity arising from divergent national rules**.

ELO stresses that success depends on **fair economic returns for farmers and foresters and avoiding excessive bureaucracy or new regulatory burdens**. It is essential to acknowledge that European farm and forest products already meet some of **the world's highest sustainability standards**. Therefore, the strategy should **focus on removing barriers, simplifying procedures, and ensuring fair competition with imported biomass**.

ELO welcomes **the European Investment Bank Group's analysis**, which identifies investment needs across bioeconomy sectors and outlines pathways for advancing sustainable, nature-positive action. As some stakeholders have noted, there is a pressing need to close financing gaps and accelerate the sustainable transition. The findings highlight significant shortfalls along the value chain, particularly in scaling biomanufacturing, developing bio-based materials, and building circular bioeconomy infrastructure. These gaps currently hinder promising innovations from reaching the market. To deploy the bioeconomy effectively, key barriers such as insufficient skills, challenges in scaling innovations, investment uncertainty, and securing a reliable supply of sustainable biomass must be clearly addressed.

ELO recalls that **bioeconomy sovereignty is crucial for the EU to maintain its position in the global market**. To achieve this, the EU needs to ensure that its external relations foster fair and strategic partnerships for primary producers, enabling them to access new markets.

ELO welcomes the creation of the European Bioeconomy Regulators and Innovators' Forum but stresses that its success depends on meaningful involvement of ground-level stakeholders, with practical, on-the-ground perspectives fully integrated into risk assessments and regulatory pathways, and early, continuous dialogue ensuring that EU and national actions reflect real implementation conditions.

BIOMASS

ELO is satisfied to see that the mention of **the "cascading principle" for biomass, particularly in the context of revision of the Renewable Energy Directive (RED III), has been removed compared to previous drafts** of the Bioeconomy Strategy. However, the European Commission appears to have

found a compromise between the various draft versions that were circulated, with the analysis and exchange of best practices on cascading use within the EC Knowledge Centre for Bioeconomy. As an organisation representing landowners and forest owners of all types, we are keen to contribute and share practical, on-the-ground insights with this community of practitioners on cascading use.

According to the European Commission, the efficient use of biomass means directing it towards higher-value applications and where feasible, biomass should be used for products and materials that store carbon for longer periods, with residual and secondary streams utilised for energy, particularly where no alternative decarbonisation solutions exist. ELO wishes to recall that wood is a highly diverse raw material, offering different uses and processing options depending on its species, quality, and strength. As many types of timber are unsuitable for the production of wood-based products, and transport distances to processing facilities can be considerable, policies should recognise these practical constraints and allow landowners the flexibility to make economically viable and sustainable choices.

ELO welcomes the new strategy's recognition that **biomass should, where feasible, be used for products and materials that store carbon over the long term, with residual and secondary streams utilised for energy, particularly when no alternative decarbonisation solutions are available.** Indeed, ELO strongly disagrees with any EU initiative that would arbitrarily disincentivise the use of biomass for energy without fully considering local realities and systemic benefits. Furthermore, it is important for the EU to consider that limiting biomass use for energy, where no practical alternative material use exists, could unintentionally affect certain economic sectors.

The role of agriculture in renewable energy must not be overlooked. **Intermediate crops offer additional sustainable biomass without using more land or competing with food production.** They improve soil health, enhance climate resilience and provide new income opportunities for farmers, while strengthening EU protein self-sufficiency and feedstock autonomy. Europe can sustainably increase its own biomass supply, but restrictive measures such as the Annex IX Part B cap risk holding back investment and innovation. A stable and enabling policy framework is needed to let European farmers fully contribute to renewable energy and bioeconomy goals.

BIOCONTROL & BIOFERTILISERS

ELO welcomes the recognition of the crucial role that biofertilisers and biopesticides play in advancing the EU bioeconomy. Their importance is two-fold. On one hand, biocontrol and biofertiliser solutions are themselves part of the growing bio-based industries, contributing directly to innovation and sustainability within the sector. On the other hand, these products act as key enablers of biomass production. For example, the use of biocontrol products in forestry and crop production helps enhance plant health, resilience, and productivity in a sustainable manner.

The Bioeconomy Strategy should therefore work hand in hand with the upcoming “Food and feed safety – simplification omnibus” to ensure faster and safer market access for these products. This will not only strengthen European competitiveness but also support the transition toward a more sustainable and resilient agricultural and forestry system. In the short and medium term, we highlight the following enablers of timely access-to-market for biocontrol:

- the need for a future-proof EU-wide **definition** of biocontrol;

- the promotion of **mutual recognition** of authorisations between Member States to ensure equal access to products across the Single Market;
- the re-activation of **provisional authorisations** under Article 30 of Regulation (EC) No 1107/2009, allowing farmers faster access to safe and effective solutions while full assessments are finalised;
- **extending authorisation periods** for biological and low risk PPPs, thereby reducing unnecessary re-application burdens;
- introducing **automatic or simplified re-authorisation procedures** for products with well-established safety and efficacy profiles;
- increased **investment in staff and technical capacity** at both Member State level and EFSA.

ELO welcomes the Strategy's recognition of bio-based and recovered fertilising products as key enablers of a circular bioeconomy. Beyond manure alone, Europe can recover valuable nutrients from a broad range of agricultural, food-processing, biowaste, digestate and aquaculture by-products, helping reduce dependence on imported synthetic fertilisers while improving soil health and closing nutrient loops.

We support the planned simplification of authorisation procedures for microbial fertilisers and the 2026 evaluation of the Fertilising Products Regulation, which should lead to clearer guidance and more proportionate rules. ELO also welcomes EU work on RENURE, biogas/digestate valorisation, and future options for the safe use of aquaculture sludge.

To unlock nutrient recovery at scale, Europe needs stable rules, investment in processing technologies, and practical, locally adapted guidance. Above all, farmers and landowners must remain central actors, with flexible pathways that encourage innovation rather than impose new administrative burdens.

DATA

Furthermore, factors such as water availability, land productivity, harvesting levels and biomass potential are highly context-specific and are best assessed through local expertise and management practices, rather than relying solely on EU-level tools such as EU wide Bioeconomy monitoring system, Copernicus or the Soil Monitoring Directive. **Disproportionate reliance on satellite-based systems risks misinterpreting land-use dynamics and could unfairly penalise agricultural and forestry activities.** ELO believes that it's a constructive approach to strengthen modelling and data through the Knowledge Centre for Bioeconomy. Consensus-building will be supported by continued cooperation with Member States, researchers, and stakeholders such as Forest Europe. However, it is essential that other relevant stakeholders, **including landowners**, are also properly taken into account

WHAT IS MISSING

Despite their importance, the role of small private landowners in managing forests sustainably and their contribution to the rural economy are **not recognised in this future strategy**. Their voices are rarely heard in decision-making processes, yet they are **key actors in our forests and rural landscapes**, and their contributions **are frequently overlooked in the wider bioeconomy debate**,

where there is a tendency to look everywhere but to the primary biomass producers. Some owners are committed to sustainable and resilient management, but they need **locally adapted and economically viable practices.** However, these Small Forest Owners operate in an increasingly **complex policy landscape**, including multiple EU regulations such as RED III, the EU Taxonomy, the Nature Restoration Regulation, and EUDR. In particular, applying the cascading principle to biomass and restricting the use of forest biomass for energy will seriously undermine **the economic viability of sustainable forest management.** As a result, **essential investments in the quality of forest ecosystems**—such as thinning operations—will be significantly reduced.

Moreover, ELO agrees that, in forests, **locally adapted sustainable management** can secure a long-term supply of raw materials for industry while maintaining a **resilient and reliable carbon sink.** However, this objective cannot be achieved without appropriate **funding mechanisms, education and training programmes, and thorough assessments of local forest conditions,** all of which must reflect **regional ecological, climatic, and socio-economic differences.** In addition, several further factors may undermine sustainable forest management and carbon-cycle functioning across Europe. These include **land abandonment**, which can increase fuel loads and wildfire risk; **tree-species migration, maladaptation, and climate-induced stress;** the spread of **pests and diseases such as bark beetle infestations,** which can rapidly weaken or destroy large areas of forest; **forest fragmentation; competing land-use demands** from agriculture, urbanisation, and infrastructure; as well as **varying levels of regulatory enforcement** between countries and regions.

While the Commission promotes carbon and biodiversity credit markets as new income sources for rural areas, **its approach risks repeating well-known shortcomings of the voluntary carbon market.** High-quality credits do depend on solid measurement and reporting, yet introducing overly complex and rigid rules from the outset could exclude smaller landowners and early developers, slowing the very restoration efforts these schemes aim to support. Moreover, ELO recalls that integrating nature credits into the CRCF is misguided. The CRCF criteria underline these challenges: quantification is straightforward for carbon but not for ecosystems; additionality is harder to prove in dynamic habitats; permanence applies to stored carbon, not fragile ecological gains; and for biodiversity, sustainability safeguards are not side-conditions but core to success. Merging the two frameworks risks reducing biodiversity to a mere co-benefit of carbon and pushing markets toward what is easiest to measure rather than what ecosystems most urgently require. A distinct, phased, and practical framework for biodiversity credits is therefore essential to ensure both climate and biodiversity finance.

ELO welcomes the European Commission's initiative to create an EU-wide knowledge repository offering practical, locally adapted guidance for farmers, foresters, and land managers to enhance productivity, resilience, and the delivery of ecosystem services. Indeed, despite being a longstanding agenda topic, Payments for Ecosystem Services (PES) have yet to take off. ELO recalls these resources must reach forest owners and managers directly, rather than being diluted along the value chain. Implementing PES at the landscape scale is crucial. PES should focus on active forest management, tailored to local conditions, rather than set-aside measures.

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About the European Landowners' Organization (ELO)

The European Landowners' Organization (ELO) is a leading voice representing the interests of landowners, rural entrepreneurs, and rural land managers in Europe. ELO promotes sustainable land management practices, fosters innovation, and advocates for the recognition of landowners' crucial role in shaping Europe's landscapes and rural areas.

