



## **THE EUROPEAN FOREST OWNERS POSITION PAPER ON THE EUROPEAN COMMISSION'S PROPOSAL FOR A DIRECTIVE ON THE PROMOTION OF THE USE OF ENERGY FROM RENEWABLE SOURCES**

The representatives of European forest owners<sup>1</sup> have the vision that forestry will be sustainable cornerstone of the evolving renewable energy market. We therefore warmly welcome and support the proposal of the European Commission for a directive on the promotion of the use of energy from renewable sources.

The European Forest Owners are the key-enablers for mobilising wood biomass, and will therefore play a key role in the implementation of renewable energy policies (e.g. wind, water).

The European Forest Owners are ready and willing to establish services and support the logistical and organisational concepts for the sustainable mobilisation of unused wood biomass, and thereby increase the biomass production in European forests. We offer our know-how and experience both to the policy making institutions on the European and the national level.

When implementing the initiatives in the RES Directive it is important to pay attention to the following aspects:

1. Existing customer relations and supply chains with well developed market-partners from the wood processing industry should be continuously developed.
2. The impact of new business developments and investments on local employment, the sustainability of forest management, value added effect and the substitution effects of materials and fossil fuels should be assessed carefully.

Today wood biomass provides a share of approximately 85% of current bio-energy production and in future it will continue to be a major source. The European Forest Owners - who are supplying a significant majority of the wood consumed in Europe - acknowledge that we have a special responsibility to ensure that the increased demand for wood will not jeopardise the multifunctional role of European forests.

In this respect we hereby outline the following issues to be addressed in the proposal:

1. The European Forest Owners understand the importance of planning the accessibility of forest biomass and therefore stress that decision makers need to clarify and define the

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<sup>1</sup> EUSTAFAFOR - European State Forest Association, FECOF - European Federation of Municipal and Local Community Forests, CEPF - Confederation of European Private Forest Owners, NSF - Nordic Family Forest Owners

interim targets and measures for the mobilisation of wood in national action plans in order to (i) secure the stable development of wood-energy markets (ii) avoid unnecessary obstacles in the forest product markets and (iii) give stability for forest investments. We acknowledge that the production of biomass must not endanger forest biodiversity.

2. The European Forest Owners support the establishment of national action plans with sectoral targets for transport, electricity and heating and cooling. Taking into account the different uses of biomass and the resulting increased demand for biomass, the mobilisation of biomass will play a crucial role in achieving targets. It is therefore of high importance that adequate policies and concrete measures to mobilise more biomass be included in the national action plans.
3. It is important to enable a fair distribution of corresponding benefits along the biomass supply chain. Support measures should take place not only on energy generation and consumption levels, but also in the biomass production sphere (with special focus on forest infrastructure, cooperation between forest owners and research) as well as in the sphere of technology development.
4. To ensure that legitimate biomass supply sources are not being excluded in an effort to screen out unsustainable biomass supply sources, it is necessary to clarify and examine the modification of the sustainability criteria and definitions in Article 15 of the proposal. The European Forest Owners propose to use the existing MCPFE process and monitor sustainability of forestry at the national level with the help of already existing regulatory framework (e.g. national forest legislation) within the framework of this process. Market-based certification schemes can complement this framework but they can not be the primary solution. Non-MCPFE signed countries will require their own special arrangements.
5. To avoid classification conflicts the European Forest Owners see the need for the harmonisation of the sustainability criteria introduced in different legislative acts and processes (for example the Green Public Procurement initiative and national standards for public procurement regarding wood products, the FLEGT regulation and respective agreements) such that additional bureaucracy and unnecessary market barriers will not arise. This will equally ensure European wood-biomass is not treated with prejudice in relation to imported biomass, agricultural biomass or even fossil fuels. As the import of bio-fuels are counted against national targets, there is a clear need for the equal treatment of wood producers inside and outside of the European Union to ensure that the sustainability criteria does not leave European forest owners in a worse market position.

In order to reach the goal of an overall reduction in emissions of 20% by 2020, and to secure the supply of energy, the European Forest Owners hope that the final proposal for a directive on the promotion of the use of energy from renewable sources can be adopted as quickly as possible.

Brussels 1<sup>th</sup> of April 2008

*The organisations representing forests owners on the European level are:*

***EUSTAFOR – European State Forest Association***

*The European State Forest Association (EUSTAFOR) acts as a representative for 28 European state forest organisations from 21 countries. EUSTAFOR members are managing an area of*

over 46 million ha, around 30% of the EU forest area and harvesting annually 110-115 million m<sup>3</sup> of wood.

***FECOF - European Federation of Municipal and Local Community Forests***

*FECOF is the umbrella organisation of municipal and local community forests in Europe, representing the national divisions from France, Germany, Italy, Czech Republic and Andorra. FECOF is acting for specific interests of the municipality forest owners with regard to their various structures and European joint solutions.*

***CEPF – Confederation of European Private Forest Owners***

*CEPF has the vision of being the heart and representative of family forestry in Europe, enhancing the values of private property through sustainable forest management. CEPF will assist and strengthen national forest owners' organisations in Europe to maintain and enhance an economical viable, social beneficial, cultural valuable and ecological responsible sustainable forest management. CEPF represents 16 million family forest owners owning approximately 100 million hectares of forest land in 23 European countries.*

***NSF - The Bureau of Nordic Family Forest Owners***

*The Bureau of Nordic Family Forest Owners represents approximately 1.000.000 Family Forest Owners in Denmark, Finland, Norway and Sweden. The one man representation is located in the middle of the EU quarters and works in a close co-operation with the Confederation of European Forest Owners, CEPF. Private families in Denmark, Finland, Norway and Sweden own about 37 million hectares of forest land which constitutes 60% of the total forest area in these countries.*