

EUSTAfor POSITION PAPER ON THE EUROPEAN COMMISSION'S PROPOSAL FOR A DIRECTIVE ON THE PROMOTION OF THE USE OF ENERGY FROM RENEWABLE SOURCES

Adopted by the General Assembly of EUSTAfor in Brussels on the 4th of March 2008¹

The members of EUSTAfor, a forum for the European state forest organisations, have a vision that forestry is a cornerstone for sustainability in the renewable energy market. EUSTAfor therefore welcomes and supports the proposal of the European Commission for a directive on the promotion of the use of energy from renewable sources.

EUSTAfor and its members want to be the key-enablers for mobilising wood biomass and further support the implementation of renewable energy policies (e.g. wind, water) on their managed forest area.

From a mid- and long-term perspective EUSTAfor members dealing with biomass issues are ready and willing to establish services and support the logistical and organisational concepts for the sustainable mobilisation of unused forest biomass potentials, and thereby increase the biomass production in European forests. EUSTAfor members will offer their know-how and experience both to the policy making institutions and the private forest owners and their associations. From a short-term perspective EUSTAfor members will actively participate as stakeholders in establishing the national renewable energy action plans.

These activities will be implemented with specific 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.

Today wood biomass provides a share of approximately 85 % of current bio-energy production and in the future it will continue to be a major source. The members of EUSTAfor - who are supplying one third of European wood - perceive it as their role to act on the wording of the named directive in order to secure the legislative procedure with reliable forestry expertise. In this respect EUSTAfor hereby outline the following issues to be addressed in the proposal:

1. EUSTAfor understands the importance of planning the accessibility of forest biomass and therefore stresses that decision makers need to clarify and define the 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 of the markets of forest products and (iii) give stability for forest investments. EUSTAfor accepts the potential concerns for biodiversity when dealing with biomass issues.

¹ Any statement in this document is to be considered as a reflection of the best available professional expertise and does not necessarily reflect the political commitments of individual member states

2. EUSTAFOR sees it as 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 and research) as well as in the sphere of technology development.
3. To make sure 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. EUSTAFOR proposes to use the existing MCPFE process and monitor sustainability of forestry at the national level within the framework of this process. Non-MCPFE signed countries will require their own special arrangements.
4. According to the proposal biomass can be defined as a biodegradable fraction of industrial and municipal waste, thus some oil products then could be classified as biomass. EUSTAFOR stresses that this definition should be revised.
5. To avoid classification conflicts EUSTAFOR sees the need for 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.
6. EUSTAFOR calls to consider a revision of Article 12 paragraph 5 regarding the conversion efficiency targets for residential applications to allow the households using current technologies to deliver against the national target.
7. As the small scale heat production from renewable biomass is one of the most efficient and viable renewable energy applications, EUSTAFOR suggest that small scale renewable heat producers should also be given the option to join the guarantee of origin system.

To reach the goals of an overall reduction on emissions of 20% by 2020 and to secure the supply of energy, EUSTAFOR hopes 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.