

EUSTAFOR Position Paper¹

Sustainability measures at EU level for solid biomass from forestry

Brussels, March, 2011

EUSTAFOR's 27 members (state forest organizations managing state forests), representing 30% of the EU forest area, are committed to sustainable forest management and working with existing certification schemes. The members' total harvest is approx. 115 million m³ per annum and together the members employ more than 100 000 people. □

EUSTAFOR has chosen to answer the consultation through this position paper but we also encourage members to answer the on-line questionnaire to give a more detailed view.

EUSTAFOR believes that biomass, in particular from forests, plays a crucial role in reaching the EU policy target of 20 % renewable energy in 2020. It is necessary, however, to increase both production and mobilization of forestry biomass to reach the goal, and this should be supported in the new Rural Development Program. It is also important to do this in a sustainable way and at the same time develop solutions for lower energy consumption.

We already have an existing policy framework for sustainable forest management (SFM) in Europe, building on the pan-European agreement on criteria for sustainable forest management (Forest Europe). Further, more than half of Europe's forests, including all forests of EUSTAFOR members, are certified through world-wide accepted voluntary certification schemes like FSC and PEFC.

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.



We also consider that sustainability criteria should be commodity based, for wood, and not product based. Product based criteria will lead to a heavy increase in administration for all forest owners who will then have to use several sets of criteria (one for each product), which is further complicated by the fact that at time for cutting you seldom know what the different parts of the tree will be used for. Consequently – in market based systems such as the European Union - the uses of wood raw material have to be issued to and decided at the commodity market places.

EUSTAFOR's position is therefore that we should not have any legally binding sustainability criteria **explicit** for biomass at EU level.

New sustainability criteria may further complicate, and make dearer, the mobilization of wood biomass for energy within the EU. This would counteract reaching the 2020 target for renewable energy, and may also lead to a further increase in imports of biomass outside of the EU where the sustainability risks are the highest.

If sustainability criteria, in spite of our view, are adopted they should be developed closely following the Forest Europe criteria for SFM. The Forest Europe criteria are well accepted across Europe and build on environmental, economic as well as social components (the three pillars of sustainability). The Forest Europe system is not product based, which simplifies the producer's handling of different woody products. Forest Europe has had a working group developing criteria for biomass. These criteria are now handled in the Forest Europe process and are therefore applicable for further integration in the EU policy development processes.

We also believe that the Forest Europe criteria should be used as a base dealing with green procurement, to avoid a flora of different systems complicating the market and the trading.

If sustainability criteria are developed, EUSTAFOR supports Forest Europe's legally binding agreement (LBA) to be adopted.

EUSTAFOR and its members are happy to support with our competence in further work on the issue.