

EUSTAFOR Position Paper¹

BIOENERGY HAS AN IMPORTANT ROLE TO PLAY IN EU POST-2020 CLIMATE AND ENERGY POLICY!

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Recently several NGOs published their recommendations relative to the role of biomass in the EU Climate and Energy Policy post 2020². The European State Forest Association (EUSTAFOR), the umbrella organization of 29 European State Forest Management Organizations managing 1/3 of the EU's forested area, does not agree with the conclusions. Through active forest management and the multipurpose use of biomass from sustainable sources, EUSTAFOR sees immense possibilities for society to counteract climate change, to substitute fossil fuels, to create more green jobs and to play an important part in the transition towards a more competitive bio-based European economy.

Two central pillars of European action on climate change are:

- Increasing the share of energy produced from renewable sources
- Improving energy efficiency

In October 2014, The European Council agreed on reducing greenhouse gas emissions by at least 40% compared to 1990, increasing the share of renewable energy to at least 27% and to boosting energy efficiency by at least 27% compared to projections (EU 2030 targets).

We can supply more sustainably produced biomass for the bioeconomy and bioenergy. No cap is needed.

The NGOs recommend: Introduce a cap to limit the use of biomass for energy to levels that can be sustainably supplied.

The amount of bioenergy that is allowed to contribute to 2030 targets should be capped to sustainable levels. This cap should be fixed on the basis of the EU's maximum sustainable potential of domestic biomass supply and take into consideration competing uses in other sectors.

EUSTAFOR affirms:

The members of EUSTAFOR follow strict legislation for sustainable forest production in their countries, apply the well-balanced Forest Europe criteria and indicators for sustainable forest management (SFM) agreed by the Ministers and are, in addition, certified. The various systems of law enforcement in the EU Member States, the Forest Europe tools for SFM and forest certification standards, are continuously developed. The high quality of forest management practices in European state forests is based on forest management plans and their high environmental standards. This is a guarantee for sustainable production.

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 organizations.

² <http://www.eeb.org/index.cfm/library/the-role-of-bioenergy-in-the-eu-climate-and-energy-policy-post-2020/>

It is also well known that Europe has unused resources since only approximately 60-70% of the annual increment in European state forests is harvested. Europe's forest area is increasing annually by approximately 600 000 ha (0,4% per year)(source: EU Forest Strategy). Increased efforts should be put into mobilizing more sustainably produced biomass from European forests!

Forest residues (branches, tops, low diameter timber) are always present when harvesting and processing. Even if, for ecological reasons, forest residues are not collected in all areas, there remains a great potential without increasing existing harvest levels. For example, state forest organizations do not harvest forest residues in areas of special interest to biodiversity, or areas with a high conservation value or on poor sites. State forest organizations have a good knowledge on where to harvest or not to harvest.

Use of biomass from forests for energy and for new and innovative wood products in the bioeconomy is also a way to give value to low quality forests and make forest improvements possible, e.g. coppice improvement, pre-commercial thinning, etc.

The principle of cascading use already exists but is acceptable only as a principle.

The NGOs recommend: Ensure efficient and optimal use of biomass resources, in line with the principle of cascading use.

Prioritising energy savings has multiple benefits, including reducing the need for biomass in the energy sector. The EU's biomass policy should specifically encourage resource demand reduction and ensure that biomass is used with greater efficiency while applying the principle of "cascading use". This means that biomass should be used to create materials and products first, and the energy content only recovered later, while respecting the waste hierarchy that requires a product first to be reused and/or recycled. Where sectors compete for the same limited sustainable biomass resource, priority should be given to uses which have limited or non-existent sustainable alternatives. The limited amount of sustainable biomass that is available for energy use should then only be used in the most energy efficient applications, within minimum efficiency thresholds.

EUSTAFOR affirms:

Resource efficiency is an overarching principle which is already ruling the multi-purpose use of biomass from forests. A single tree supplies a wide range of products, such as construction elements, veneer, floors, furniture, paper, board, energy and new products in the emerging bio-economy.

It is good to have cascading as a general principle that is understood as resource efficiency. In fact, cascade use already exists in a free market, in which the price is normally higher for high quality wood, which can be used for higher value-added products. No one wants to burn a veneer log when using it for veneer brings more income!

European state forests are great promoters of innovation in the forest-based sector. There are more and more new products being developed, such as biofuels and other biomaterials (plastics, composites, etc.).

Work on energy savings and the development of resource efficient methods must be continued. Subsidies to the energy sector are often criticized, but subsidies for industry when new plants are built are not uncommon. Subsidies are necessary incentives for innovation, for the energy sector to change its structure and to make it more energy



efficient and climate friendly. However, subsidies should not be permanent, since they might negatively impact the timber market. They should be reduced and taken away over time.

European State Forest Organizations strongly support open market rules in the entire forest sector and strongly oppose over-regulating it with administrative restrictions. A cascading principle should not hinder the transition towards a bio-based economy based on, among others, a supply of sustainably produced, renewable, climate friendly raw material from forests!

Carbon accounting for forest biomass is already correct.

The NGOs recommend: Include correct carbon accounting for biomass.

All biomass that receives support and subsidies under EU law should be subject to comprehensive accounting of carbon emissions and minimum requirements for the delivery of real emission savings. This accounting should include a full carbon footprint of bioenergy use including fossil fuel substitution, carbon debt, indirect land use change, foregone carbon sequestration, and displacement of other uses of biomass. Emissions from all aspects of biomass cultivation, processing, transport and combustion should also be accounted for.

EUSTAFOR affirms:

Biomass from forests **is** carbon neutral. Forest grows and sequesters carbon dioxide through photosynthesis in a long life cycle that ranges between approximately 40 years for fast growing species (e.g. poplar) to as much as 180 years for slow growing species (e.g. oaks). There are also emissions from forestry operations such as those from harvesting and processing timber. However, these emissions are much smaller than the total uptake of CO₂ during the lifetime of the trees. In the overall accounting, transport emissions must be taken into account as well, but normally they are very small and "regulated" by the fact that the profit on producing and selling biomass for energy is much too small to allow for anything other than short transport distances. Therefore, the use of forest biomass for energy adds no new carbon into the atmosphere, as is the case for fossil fuels.

A further possibility to minimize carbon emissions in policy-relevant time frames, keeping the global warming increase below two degrees Celsius, is to increase the use of wood in construction by, for example, building wooden houses. The wood used for this purpose substitutes for other materials which have bigger carbon emissions. At the same time, the carbon in wood used for construction is locked in for an average of 80 years.

No need to introduce a new system with sustainability criteria and indicators.

The NGOs recommend: Introduce comprehensive and binding sustainability criteria.

In order to ensure that only sustainable forms of bioenergy are promoted, robust safeguards that cover environmental and social impacts are needed. In particular, biomass production must not cause direct or indirect destruction or degradation of forests or other ecosystems with high biodiversity and/or carbon storage value. Only bioenergy practices that fully meet robust sustainability criteria should be counted towards renewable energy targets or be eligible for any type of financial support.

Biomass sustainability criteria must help ensure that land management practices contribute to biodiversity and environmental objectives and prevent further negative environmental impacts including carbon stock decreases in soils and ecosystems, biodiversity loss, soil erosion, depletion of water resources and loss of soil health due to increased use of synthetic fertilizers, pesticides and herbicides. (IFES).



EUSTAFOR affirms:

The sustainability of forest management - and its products and services in general - is well covered and ensured by national legislation and practices and the governance systems developed by individual member states.

In addition, forest certification (a market-based third party verification system) has, to a great extent, been applied in European state forests. This ensures high environmental standards in forest management. Both legislation and certification schemes are continuously under development to incorporate new knowledge and to be adjusted to the objectives of other relevant sectoral policies.

Sustainable forest management (SFM) as a land use concept is complex and has to meet environmental, economic and social challenges and the requirements of the multi-functionality of forests. This is why the criteria and indicators of SFM have been defined to cover the entire spectrum of forests and their management and NOT only product-based criteria and indicators.

This is of significant importance because to be resource efficient and use trees in an optimal way, different parts of the tree are used for different purposes. A single tree can provide veneer, floors, chairs, paper, board, energy and so on. With product-based criteria and indicators this would lead to a situation where the manager would need many different sets/systems matching all different possible products.

EUSTAFOR members are certified and are therefore familiar with using criteria and indicators. However, these criteria and indicators cover how forests are managed and NOT those relative to different end products.

For all the above reasons, European state forest organizations are continuously in favor of a legally binding agreement and criteria and indicators based on the Forest Europe (FE) process, which should provide a legally binding common denominator of SFM internationally and a reference to all other policies which address the sustainability of forest management and its products. We acknowledge there is a need to continuously develop the FE criteria and indicators to ensure that they include the latest knowledge, including the latest knowledge in the fields of climate change and bioenergy.

EUSTAFOR's 29 members (state forest organizations managing state forests) represent around one third of the EU forest area. They are committed to sustainable forest management and work with the existing forest certification schemes. The total harvest of EUSTAFOR members is over 123 million m³ of round timber per annum and together they employ more than 100 000 individuals.

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