

EUSTAFOR Position Paper¹

No Mandatory Criteria for Solid Biomass at This Stage

Brussels 17th November 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's position is that there should not be any legally binding sustainability criteria **explicitly** for biomass at the EU level.

EUSTAFOR believes that biomass, in particular from sustainably managed forests, plays a crucial role in reaching the EU policy target of 20 % renewable energy in 2020. It is necessary, however, to increase both sustainable production and mobilization of forest-based biomass and to increase energy efficiency as well as to reduce energy consumption in order to reach this goal.

New additional sustainability criteria may further hinder needed mobilization of wood biomass for energy within the EU. This would be an impediment to reaching the 2020 target for renewable energy and may also lead to a further increase in imports of biomass from non-EU countries where the sustainability risks are much higher than within the EU.

Solid biomass does not originate only from forests and forestry, but also from sources such as agriculture and waste. At the moment the European Commission has suggested excluding waste from any sustainability criteria. Different regulation for different types of biomass may lead to a distortion in the market and cause a shift to less sustainable energy sources. Additional sustainability criteria for solid biomass could also weaken the competitiveness of renewable energy sources in compari-

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.

son to fossil fuels and hence work against achieving the EU renewable energy targets.

We also consider that sustainability criteria for wood should be commodity-based and not product-based. Product-based criteria will lead to a heavy increase in administration for all forest owners where they have to handle several systems with criteria that are all slightly different.

Furthermore, EUSTAFOR members have already put different voluntary certification systems in place in order to ensure the sustainability of their forest management and wood production.

It is also obvious that there are now decisions and ongoing work in several fields regarding sustainability and biomass (REDD+, Timber Regulation - including the Due Diligence Regulation, LULUCF, and negotiations for a Legally Binding Agreement (LBA) within the Forest Europe Process). To start adding yet another approach, even before some of the regulations mentioned above are in force and their effects can be evaluated, would only result in additional complications.

It also seems a bit odd to us that the European Commission, being involved in the negotiations on the LBA within the Forest Europe Process, would work in parallel on a separate regulation concerning the same issue.

In view of all the above remarks, we suggest the EU first consider the outcome of the LBA negotiations, try to achieve as good a result as possible, and only then consider the need for further action. We especially favor this approach because, contrary to the EU criteria discussions, the overall LBA approach balances environmental, production and social interests.

EUSTAFOR and its members would, as always, be happy to offer their know-how and support in the further work on these issues.