



November 19, 2012

Joint Position

Forest owners question binding EU sustainability criteria for solid biomass

Woody biomass from sustainably managed European forests plays a crucial role in reaching the EU policy target of 20% renewable energy in 2020 and is fundamental to European green growth. It is, however, necessary to increase both sustainable production and mobilization of forest-based biomass to reach this target. A sound mobilization of under-used domestic biomass should be further supported in Europe under existing legislation and frameworks already in place.

Additional sustainability criteria for a single product are not operational

Solid biomass for energy production derives primarily from thinning and final harvesting operations and consists mainly of logging residues. It is basically a by-product. Applying specific sustainability criteria for a single product is - considering the wide spectrum of multiple products and functions forestry provides - not operational. Regardless of the end use of logged timber, some part of timber is normally used for energy production. Therefore applying specific criteria for biomass actually means common sustainability criteria for all timber and forest management as such.

In addition, mandatory sustainability criteria for solid biomass could

- a) weaken the competitiveness of renewable energy sources in comparison to fossil fuels,
- b) lead to a distortion of the energy market, and
- c) jeopardize investments to the European bioenergy-based green sector, which are either planned or have already been made.

Additional costs and bureaucracy placed on the shoulders of European forest owners may further hinder needed mobilization of sustainable domestic woody biomass for energy. This could cause a further increase in imports of biomass from non-EU countries where sustainability is not guaranteed and where the carbon footprint due to long transport distances compromises the carbon neutrality of woody biomass. These points would certainly be an impediment to reaching the EU 2020 targets.

Forest owners (private and public) are asking for full recognition of the potential and mutual benefits domestic carbon neutral woody biomass from sustainably managed forests in Europe are providing to the environment, society and economy, when considering the mix of renewable resources for bioenergy production. Woody biomass will and must play a role in renewable energy. Instead of questioning its sustainability and restricting the use and production of woody biomass in Europe's forests, policies should rather support green investments and new technologies, resource and energy efficiency, increase forest growth and the mobilization of domestic sustainable wood, and encourage the use of wood, not only for energy purposes, but also as a long-term product, e.g. in construction.

Forest owners expect consistency from the European climate and energy policy makers on biomass. The European Commission clearly states the positive climate benefits of wood energy in its ILUC proposal on second-generation liquid biofuels (COM(2012)/595/final). At the same time, however, the European Commission is proposing additional sustainability requirements for solid biofuels, which may even go beyond the existing criteria on liquid biofuels. This is an example of EU policy inconsistency and possible constraints, which might occur when applying single-product sustainability criteria.

Sustainable forest management is guaranteed in Europe

European forest owners (private and public) have a long-standing commitment to sustainable forest management. Forest cover and timber stocks in the EU have been steadily increasing over the last 50 years.

At sub-national and national levels, EU Member States have proper instruments and regulations in place, which safeguard the principles of sustainable forest management, i.e. forest laws and other complementary regulations such as nature or forest-protection regulations, public procurement regulations, or land-use and related planning acts. Furthermore, the scope of national forest laws has expanded over the last decades in most countries, covering the multiple social, economic and political aspects of sustainable forest management. There are also market-based tools – such as forest certification – which exists in many countries, giving additional assurance of sustainable forest management in practice.

At EU level, several well-established instruments are in place, which support and guarantee sustainable land use and forest management and regulate timber markets, such as Natura 2000 and the EU Timber Regulation.

Over the last two decades the pan-European Forest Europe process defined and developed commonly accepted principles of sustainable forest management. These principles are a core element in most national forest regulations and programs. At the Oslo summit in July 2011, Ministers and the EU agreed to start the negotiations on a Legally Binding Agreement (LBA), which will provide the necessary European framework to further support and facilitate national actions in ensuring and implementing sustainable forest management.

Any new regulation on forest biomass should comply with existing EU law and strategies as well as with international commitments on forests and should be mutually beneficial.

Private and public forest owners strongly recommend that the European Commission examines the arguments provided above before undertaking any further steps with regards to the establishment and adoption of legally binding sustainability criteria of biomass in the EU. The Secretariats of CEPF and EUSTAFOR, supported by their members, are offering to contribute their know-how and expertise during the further work on this important and challenging policy topic.

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