

# A sustainable bioenergy policy for the period after 2020

Fields marked with \* are mandatory.

## Introduction

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EU Member States have agreed on a new policy framework for climate and energy, including EU-wide targets for the period between 2020 and 2030. The targets include reducing the Union's greenhouse gas (GHG) emissions by 40 % relative to emissions in 2005 and ensuring that at least 27 % of the EU's energy comes from renewable sources. They should help to make the EU's energy system more competitive, secure and sustainable, and help it meet its long-term (2050) GHG reductions target.

In January 2014, in its Communication on A policy framework for climate and energy in the period from 2020 to 2030,[1] the Commission stated that '[a]n improved biomass policy will also be necessary to maximise the resource-efficient use of biomass in order to deliver robust and verifiable greenhouse gas savings and to allow for fair competition between the various uses of biomass resources in the construction sector, paper and pulp industries and biochemical and energy production. This should also encompass the sustainable use of land, the sustainable management of forests in line with the EU's forest strategy and address indirect land-use effects as with biofuels'.

In 2015, in its Energy Union strategy,[2] the Commission announced that it would come forward with an updated bioenergy sustainability policy, as part of a renewable energy package for the period after 2020.

Bioenergy is the form of renewable energy used most in the EU and it is expected to continue to make up a significant part of the overall energy mix in the future. On the other hand, concerns have been raised about the sustainability impacts and competition for resources stemming from the increasing reliance on bioenergy production and use.

Currently, the Renewable Energy Directive[3] and the Fuel Quality Directive[4] provide an EU-level sustainability framework for biofuels[5] and bioliquids.[6] This includes harmonised sustainability criteria for biofuels and provisions aimed at limiting indirect land-use change,[7] which were introduced in 2015.[8]

In 2010, the Commission issued a Recommendation[9] that included non-binding sustainability criteria for solid and gaseous biomass used for electricity, heating and cooling (applicable to installations with a capacity of over 1 MW). Sustainability schemes have also been developed in a number of Member States.

The Commission is now reviewing the sustainability of all bioenergy sources and final uses for the period after 2020. Identified sustainability risks under examination include lifecycle greenhouse gas emissions from bioenergy production and use; impacts on the carbon stock of forests and other ecosystems; impacts on biodiversity, soil and water, and emissions to the air; indirect land use change impacts; as well as impacts on the competition for the use of biomass between different sectors (energy, industrial uses, food). The Commission has carried out a number of studies to examine these issues more in detail.

The development of bioenergy also needs to be seen in the wider context of a number of priorities for the Energy Union, including the ambition for the Union to become the world leader in renewable energy, to lead the fight against global warming, to ensure security of supply and integrated and efficient energy markets, as well as broader EU objectives such as reinforcing Europe's industrial base, stimulating research and innovation and promoting competitiveness and job creation, including in rural areas. The Commission also stated in its 2015 Communication on the circular economy<sup>[10]</sup> that it will 'promote synergies with the circular economy when examining the sustainability of bioenergy under the Energy Union'. Finally, the EU and its Member States have committed themselves to meeting the 2030 Sustainable Development Goals.

[1] COM(2014) 15.

[2] COM/2015/080 final.

[3] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC (OJ L 140, 5.6.2009, p. 16).

[4] Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

[5] Used for transport.

[6] Used for electricity, heating and cooling.

[7] Biomass production can take place on land that was previously used for other forms of agricultural production, such as growing food or feed. Since such production is still necessary, it may be (partly) displaced to land not previously used for crops, e.g. grassland and forests. This process is known as indirect land use change (ILUC); see <http://ec.europa.eu/energy/en/topics/renewable-energy/biofuels/land-use-change>.

[8] See more details on the existing sustainability framework for biofuels and bioliquids in section 5.

[9] COM/2010/0011 final.

[10] Closing the loop – an EU action plan for the circular economy (COM(2015) 614/2).

## 1. General information about respondents

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★ 1.1. In what capacity are you completing this questionnaire?

- ☐ academic/research institution
- ☐ as an individual / private person
- ☐ civil society organisation
- ☐

- international organisation
- ☐ other
- ☐ private enterprise
- ☒ professional organisation
- ☐ public authority
- ☐ public enterprise

\* 1.4. If you are a professional organisation, which sector(s) does your organisation represent?

- ☒ Agriculture
- ☐ Automotive
- ☐ Biotechnology
- ☐ Chemicals
- ☒ Energy
- ☐ Food
- ☒ Forestry
- ☐ Furniture
- ☐ Mechanical Engineering
- ☐ Other
- ☐ Printing
- ☐ Pulp and Paper
- ☐ Woodworking

1.5. If you are a professional organisation, where are your member companies located?

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal

- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☒ Sweden
- ☐ United Kingdom
- ☐ non-EU country(ies)

1.8. If replying as an individual/private person, please give your name; otherwise give the name of your organisation

*200 character(s) maximum*

The Federation of Swedish Farmers (LRF)

1.9. If your organisation is registered in the Transparency Register, please give your Register ID number.

(If your organisation/institution responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.)

*200 character(s) maximum*

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1.10. Please give your country of residence/establishment

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland

- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☒ Sweden
- ☐ United Kingdom
- ☐ Other non-EU European country
- ☐ Other non-EU Asian country
- ☐ Other non-EU African country
- ☐ Other non-EU American country

★ 1.11. Please indicate your preference for the publication of your response on the Commission's website:

(Please note that regardless the option chosen, your contribution may be subject to a request for access to documents under [Regulation 1049/2001](#) on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable [data protection rules](#).)

- ☐ Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- ☒ Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- ☐ Please keep my contribution confidential. (it will not be published, but will be used internally within the Commission)

## Perceptions of bioenergy

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### 2.1. Role of bioenergy in the achievement of EU 2030 climate and energy objectives














































Please indicate which of the statements below best corresponds to your perception of the role of bioenergy in the renewable energy mix, in particular in view of the EU's 2030 climate and energy objectives:

- ☒ Bioenergy should continue to play a dominant role in the renewable energy mix.
- ☐ Bioenergy should continue to play an important role in the renewable energy mix, but the share of other renewable energy sources (such as solar, wind, hydro and geothermal) should increase significantly.
- ☐ Bioenergy should not play an important role in the renewable energy mix: other renewable energy sources should become dominant.

### 2.2. Perception of different types of bioenergy

Please indicate, for each type of bioenergy described below, which statement best corresponds to your perception of the need for public (EU, national, regional) policy intervention (tick one option in each line):

	Should be further promoted	Should be further promoted, but within limits	Should be neither promoted nor discouraged	Should be discouraged	No opinion
Biofuels from food crops	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from energy crops (grass, short rotation coppice, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from waste (municipal solid waste, wood waste)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from agricultural and forest residues	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from algae	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biogas from manure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biogas from food crops (e.g. maize)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biogas from waste, sewage sludge, etc.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heat and power from forest biomass (except forest residues)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heat and power from forest residues (tree tops, branches, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Heat and power from agricultural biomass (energy crops, short rotation coppice)					
Heat and power from industrial residues (such as sawdust or black liquor)					
Heat and power from waste					
Large-scale electricity generation (50 MW or more) from solid biomass					
Commercial heat generation from solid biomass					
Large-scale combined heat and power generation from solid biomass					
Small-scale combined heat and power generation from solid biomass					
Heat generation from biomass in domestic (household) installations					
Bioenergy based on locally sourced feedstocks					

Bioenergy based on feedstocks sourced in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bioenergy based on feedstocks imported from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the "other" choice

200 character(s) maximum

EU needs to reduce fossil energy. In order to do so all renewables are needed and it must be a level playing field between bioenergy and other renewables. Waste should be minimized and preferably used

### 3. Benefits and opportunities from bioenergy

#### 3.1. Benefits and opportunities from bioenergy

Bioenergy (biofuel for transport, biomass and biogas for heat and power) is currently promoted as it is considered to be contributing to the EU's renewable energy and climate objectives, and also having other potential benefits to the EU economy and society.

Please rate the contribution of bioenergy, as you see it, to the benefits listed below (one answer per line):

	of critical importance	important	neutral	negative	No opinion
Europe's energy security: safe, secure and affordable energy for European citizens	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Grid balancing including through storage of biomass (in an electricity system with a high proportion of electricity from intermittent renewables)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of GHG emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental benefits (including biodiversity)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Resource efficiency and waste management	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Boosting research and innovation in bio-based industries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of European industry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growth and jobs, including in rural areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable development in developing countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the "other" choice

*200 character(s) maximum*

It's neither food or fuel nor bioenergy or forest products. With smart production, high efficiency and consumption the possibility to meet the demands with renewable biomass will be achieved.

3.2. Any additional views on the benefits and opportunities from bioenergy? Please explain

*2500 character(s) maximum*

LRF underlines the importance of promoting forest biomass in the heating/cooling sectors including CHP and the transport sectors. Variable renewable electricity (wind, solar) needs to be balanced in the energy system, hence biomass have a large advantage.

EU needs to minimize greenhouse gas (GHG) emissions, which will benefit climate as well as other environmental values (incl. biodiversity). Without keeping the temperature rise below 2 degrees C (or even 1.5) the climate will severely affect the environmental values.

Bioenergy is needed in order to reach the EU 2030-goals. All avoided GHG-emissions are beneficiary. By using renewable raw material, e.g. as bioenergy, landowners will be inspired to produce more. Today only 60 % of the forest growth is harvested in the EU and if the market grows there is possibility to have a higher yield with better silviculture. Improved techniques and increasing production will make full use of production capacity and green growth. Also agricultural crops and residues for bioenergy use can pay a large role in many EU countries.

This approach would ensure consistency between EU energy, climate and

agricultural policies and would support investments in the bioeconomy; one of the difficulties the bioeconomy has is establishing biomass supply chains. The transition must be supported and promoted, as this will bring: Economic growth, new jobs and rural development. The Swedish experience is that bioenergy is a steppingstone for the whole bioeconomy.

Bioenergy and biofuel production has and will encourage investments in farms and forests and related industry as well as research. This is beneficial for the whole bioeconomy as well as rural development.

## 4. Risks from bioenergy production and use

### 4.1. Identification of risks

A number of risks have been identified (e.g. by certain scientists, stakeholders and studies) in relation to bioenergy production and use. These may concern specific biomass resources (agriculture, forest, waste), their origin (sourced in the EU or imported) or their end-uses (heat, electricity, transport).

Please rate the relevance of each of these risks as you see it (one answer per line):

	critical	significant	not very significant	non-existent	No opinion
Change in carbon stock due to deforestation and other direct land-use change in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Change in carbon stock due to deforestation and other direct land-use change in non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect land-use change impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
GHG emissions from the supply chain (e.g. cultivation, processing and transport)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions from combustion of biomass ('biogenic emissions')	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on air quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Impacts on water and soil	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on biodiversity	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Varying degrees of efficiency of biomass conversion to energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition between different uses of biomass (energy, food, industrial uses) due to limited availability of land and feedstocks and/or subsidies for specific uses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Internal market impact of divergent national sustainability schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the "other" choice

*200 character(s) maximum*

Ideas that bioenergy is unsustainable is a critical risk, although untrue as CAP, RED and EU Timber Regulation ensures sustainable production as this is a significant part of the MS forest legislation

4.2. Any additional views on the risks from bioenergy production and use? Please explain

*2500 character(s) maximum*

Energy is cheap due to low coal and oil prices and this hampers the transition to a fossil free energy mix. There is nothing that suggests that the prices will rise so the change into renewables must be justified by reduced GHG emissions and the need to fight climate change. Further burdens on bioenergy due to administration will not help the situation. EU faces a great challenge to develop the economy to a circular and biobased economy. EU needs to stop using fossil energy and fossil raw material and today's fossil supply chains, infrastructure, and logistics need to be changed to new ones. A major societal challenge.

Competition between uses of renewable raw material is not a problem, as some suggest, it is fruitful and creates new market for farmers and forest owners.

Naturally, more efficient use is better than less efficient use, but all use of bioenergy will keep the fossil in the ground and this is the most important. High performing solutions should be promoted.

Market barriers can be a risk for bioenergy, why all legally produced biomass should be accepted within the EU, e.g. CAP, RED and the EU timber regulation. The research by the Swedish Energy Agency, among others, has led to that Sweden have formed legislation and guiding principles as to how and where extraction of forest biomass can be conducted.

## 5. Effectiveness of existing EU sustainability scheme for biofuels and bioliquids

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In 2009, the EU established a set of sustainability criteria for biofuels (used in transport) and bioliquids (used for electricity and heating). Only biofuels and bioliquids that comply with the criteria can receive government support or count towards national renewable energy targets. The main criteria are as follows:

- Biofuels produced in new installations must achieve GHG savings of at least 60 % in comparison with fossil fuels. In the case of installations that were in operation before 5 October 2015, biofuels must achieve a GHG emissions saving of at least 35 % until 31 December 2017 and at least 50 % from 1 January 2018. Lifecycle emissions taken into account when calculating GHG savings from biofuels include emissions from cultivation, processing, transport and direct land-use change;
- Biofuels cannot be grown in areas converted from land with previously (before 2008) high carbon stock, such as wetlands or forests;
- Biofuels cannot be produced from raw materials obtained from land with high biodiversity, such as primary forests or highly biodiverse grasslands.

In 2015, new rules<sup>[1]</sup> came into force that amend the EU legislation on biofuel sustainability (i.e. the Renewable Energy Directive and the Fuel Quality Directive) with a view to reducing the risk of indirect land-use change, preparing the transition to advanced biofuels and supporting renewable electricity in transport. The amendments:

- limit to 7 % the proportion of biofuels from food crops that can be counted towards the 2020 renewable energy targets;
- set an indicative 0.5 % target for advanced biofuels as a reference for national targets to be set by EU countries in 2017;
- maintain the double-counting of advanced biofuels towards the 2020 target of 10 % renewable energy in transport and lay down a harmonised EU list of eligible feedstocks; and
- introduce stronger incentives for the use of renewable electricity in transport (by counting it more towards the 2020 target of 10 % renewable energy use in transport).

[1] Directive (EU) 2015/1513 of the European Parliament and of the Council of 9 September 2015 amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources (OJ L 239, 15.9.2015, p. 1).

### 5.1. Effectiveness in addressing sustainability risks of biofuels and bioliquids

In your view, how effective has the existing EU sustainability scheme for biofuels and bioliquids been in addressing the risks listed below? (one answer per line)

	effective	partly effective	neutral	counter-productive	No opinion
GHG emissions from cultivation, processing and transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions from direct land-use change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on biodiversity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on soil, air and water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any additional comments?

*2500 character(s) maximum*

The EU have established the most ambitious sustainability policy for biofuels and bioliquids in the world. Common Agricultural Policy (CAP) ensures the highest level of environmental performance (including impact on soil, air and water), and all MS have adopted legislation based on Forest Europe criteria.

RED has created a level playing field, as it's now possible to compare the emissions of GHG. On the downside, current RED discriminates first generation biofuels without defining a scientific argumentation for this. There has been a lack of long term policy regarding sustainability criteria, and the ILUC debate and decisions have led to major uncertainties on the biofuels sector and decreased development in biofuel production. By adopting the ILUC directive with increased double-counting, the dependence on fossil fuels will be higher in 2020, than the earlier RED targets. There is no scientific consensus on the nature and impacts of ILUC.

Instead of having lists with double and quadruple counting the GHG saving should be in focus - regardless of source. All renewable energy sources are needed in order to cut-off the fossil demand. The dependence of imported oil is still very high in the transport sector, and RED has made little to change this. Only a couple of member states so far have and will reach the 2020-targets.

The methodology regarding the calculation of GHG in Annex V of the RED needs revision.

## 5.2. Effectiveness in promoting advanced biofuels

In your view, how effective has the sustainability framework for biofuels, including its provisions on indirect land-use change, been in driving the development of 'advanced' biofuels, in particular biofuels produced from ligno-cellulosic material (e.g. grass or straw) or from waste material (e.g. waste vegetable oils)?

- ☐ very effective
- ☐ effective
- ☐ neutral
- ☒ counter-productive
- ☐ no opinion

What additional measures could be taken to further improve the effectiveness in promoting advanced biofuels?

*2500 character(s) maximum*

RED was effective at first but after alterations and inclusion of caps, and ILUC it became counterproductive. There is no scientific consensus on the nature and impacts of ILUC. The uncertainty of the ILUC-directive has decreased development in biofuel production. Development in the biofuel and bioliquid sector, depends on a strong market for existing production. To develop new biofuels from e.g. cellulosic feedstock and new production processes, massive support is needed for research, development and demonstration of these new technologies. A number of large-scale production units must be built in the coming years. For this to happen, the investors and bankers need secure, long-term conditions. Today, the opposite is the case. The conditions after 2020 are unknown. Large investments in biorefineries which is needed in order to produce advanced biofuels, needs stability. Any adjustment, whether good or bad, creates insecurity.

One fundamental barrier is that EU has not indicated any target for renewable energy in the transport sector for 2030. Another barrier is the regulation of state aid rules. In order to replace fossil fuels the regulation of state aid is a huge barrier since it does not consider the difference between fossil and renewable fuels. An exemption from CO<sub>2</sub>-tax for renewable fuel is regarded as giving the renewable fuel a subsidy, which of course is not the case since renewable fuels do not contribute to climate harm.

All renewable sources are needed in order to cut-off the fossil demand. Instead of having lists with double and quadruple counting the GHG saving should be in focus – regardless of source. To reach the EU 2050 target it's vital to use new partners and start new trading routes. The development of alternative fuels is an interaction between the market and the production sector. However, this complex interaction is moving forwards thanks to industrial initiatives and directed financial support. The problem is the lack

of political direction, lack of long term policies, and a lack of transparency in developing renewable energy policies. This is unfortunate as it hampers the biofuel industry.

### 5.3. Effectiveness in minimising the administrative burden on operators

In your view, how effective has the EU biofuel sustainability policy been in reducing the administrative burden on operators placing biofuels on the internal market by harmonising sustainability requirements in the Member States (as compared with a situation where these matter would be regulated by national schemes for biofuel sustainability)?

- ☐ very effective
- ☒ effective
- ☐ not effective
- ☐ no opinion

What are the lessons to be learned from implementation of the EU sustainability criteria for biofuels? What additional measures could be taken to reduce the administrative burden further?

*2500 character(s) maximum*

It is useful to have the same rules within the whole EU and the possibilities for farmers to make self-declaration are effective in reducing the administrative burden. However, the administrative burden can be reduced for producers and distributors of biofuels and bioliquids that only handle small volumes. All actors have to present identical paper work, regardless of volumes, why the administrative burden is considerably higher for small actors. A volume threshold should therefore be implemented.

In order to not create additional administrative burdens for forest owners, all biomass produced in the forests under the EU Timber regulation needs to be considered as sustainable. Forest biomass shall come from countries with mandatory LULUCF accounting. If not, credible proof has to be given that the harvesting rate in this country does not exceed 100% and the biomass does not come from land conversion. Where there is overharvesting at the country level, the operator has to give sufficient proof that there is no overharvesting at the relevant regional level of the biomass origin.

If consumer demands even more proof of sustainability there are certifications schemes as PEFC or FSC that could give an extra value on the market. However, these market driven schemes should not be needed in order to be a legal producer of renewable raw material.

### 5.4. Deployment of innovative technologies

In your view, what is needed to facilitate faster development and deployment of innovative technologies in the area of bioenergy? What are the lessons to be learned from the existing support mechanisms for innovative low-carbon technologies relating to bioenergy?

Stable and long term rules, with ambitious targets for renewables, are needed to encourage continued investment in innovative technologies. In that respect, the bioenergy policy and the RED need to tie into a single, sustainable, technology-open framework.

At the moment fossil fuels are not carrying the full total cost (excl. environmental externalities). Hence monetary policy, e.g. taxation of fossil GHG-emissions is needed. It's also necessary to remove all monetary subsidies for fossils and instead promote use of bioenergy and other renewables with high GHG-emissions savings.

When innovative technologies and approaches are introduced, there may be a need for funding of research, development and market introduction. It is important to stress the need for a flexible approach as new technologies are being developed constantly in this field, all the time, thus quickly making projection inexact, and in some cases hindering development.

Electric vehicles or hybrids can be a positive contribution as long as the source of the electricity is not fossil. However, the transition will take a very long time if there is no fuel with good GHG-emission saving values possible to use in the existing fleet of vehicles.















































## 6. Effectiveness of existing EU policies in addressing solid and gaseous biomass sustainability issues

6.1. In addition to the non-binding criteria proposed by the Commission in 2010, a number of other EU policies can contribute to the sustainability of solid and gaseous bioenergy in the EU. These include measures in the areas of energy, climate, environment and agriculture.

In your view, how effective are current EU policies in addressing the following risks of negative environmental impacts associated with solid and gaseous biomass used for heat and power? (one answer per line)

	effective	partly effective	neutral	counter-productive	No opinion
Change in carbon stock due to deforestation, forest degradation and other direct land-use change in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Change in carbon stock due to deforestation, forest	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



degradation and other direct land-use change in non-EU countries					
Indirect land-use change impacts					
GHG emissions from supply chain, e.g. cultivation, processing and transport					
GHG emissions from combustion of biomass ('biogenic emissions')					
Air quality					
Water and soil quality					
Biodiversity impacts					
Varying degrees of efficiency of biomass conversion to energy					
Competition between different uses of biomass (energy, food, industrial uses) due to limited availability of land and feedstocks					
Other					

## 6.2. Any additional views on the effectiveness of existing EU policies on solid and gaseous biomass? Please explain

*2500 character(s) maximum*

CAP ensures the highest level of environmental performance and all MS have adopted legislation based on Forest Europe criteria. There is no scientific consensus on the nature and impacts of ILUC.

The sustainable management of forests concerns all European forest products and has already been implemented and put into practice by forest owners and foresters for generations. The sustainability of biomass is an issue which cannot be addressed according to the specific use of the biomass. Establishing new or additional sustainability criteria for specific qualities of trees or parts of trees depending on their use makes absolutely no sense. Biomass is

plentiful in most EU regions.

The suggested risk for competition between different uses is not relevant as different biomass can be used differently. The cascade principle needs to be regulated by market conditions.

The EU should support the Forest Europe process and promote inclusion of FE indicators in 3rd countries legislation, as it is a vital reference for the sustainable use of forest resources as well as being part of the production of renewable energy sources. This together with the EUTR will be sufficient.

The principle of carbon neutrality of forest biomass must be maintained in line with existing international rules. LULUCF do consider carbon stock changes.

GHG-emissions from the supply chain are accounted for in the industry and transport sector , and double counting should be avoided.

Energy Efficiency Directive (EED) indicates that effective CHP should be used but as of today there are no sanctions.

Agricultural biomass from agricultural holdings which are eligible for the CAP should be considered as complying with sustainability criteria. The use of agricultural commodities for energy purposes should not be outlawed by legislation.

The EU bioenergy policy is not a legislation that can resolve the environmental problems in Third Countries. EU can encourage the introduction of effective environmental legislation in third countries in order to prevent land use change through international agreements, as is suggested by the EP Resolution of 15th March 2012 under point 44 of the Roadmap for moving to a low-carbon economy in 2050 (P7\_TA(2012)0086).

## 7. Policy objectives for a post-2020 bioenergy sustainability policy

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7.1. In your view, what should be the key objectives of an improved EU bioenergy sustainability policy post-2020? Please rank the following objectives in order of importance: most important first; least important 9th/10th (you can rank fewer than 9/10 objectives):

	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th
Contribute to climate change objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoid environmental impacts (biodiversity, air and water quality)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mitigate the impacts of indirect land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promote efficient use of the biomass resource, including efficient energy conversion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote free trade and competition in										

the EU among all end-users of the biomass resource	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure long-term legal certainty for operators	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimise administrative burden for operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote energy security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote EU industrial competitiveness, growth and jobs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify the "other" choice

*200 character(s) maximum*

Promote active management for higher yield of biomass.

## 7.2. Any other views? Please specify

*2500 character(s) maximum*

Stable rules, free trade and minimal administrative burden will promote jobs and industrial competitiveness.

There is no scientific consensus on the nature and impacts of ILUC.

EU faces a great challenge to become a bioeconomy but with smart sustainable and inclusive growth this can be met. Competition between uses of renewable raw material is not a problem, as some suggest. Instead LRF believes that competition will result in a more sustainable production of biomass and the promotion of better forest growth and a sustainable intensification in agriculture. Naturally, more efficient use is better than less efficient use, but all use of bioenergy will keep the fossil in the ground and this is the most important. High performing solutions should be promoted.

Today's energymix in the EU is not sustainable with regard to climate change. Therefore, a sustainable bioenergy policy should ensure continuation and development of secure energy with low GHG-emissions within the EU. The policy should not create rules or burdens, but instead promote bioenergy and establish the crucial value bioenergy has for the whole of EU and that bioenergy contributes to the post-2020 goals. Domestic energy is more secure and conducive to investment in the Member States, which creates prosperity. It is also easier to ensure good working conditions with domestically produced energy.

By promoting bioenergy all three pillars of sustainability is promoted within the EU. EU need to reduce the use of fossils substantially and therefore active management of the "green sector" and sustainable intensification should be promoted. Use of bioenergy will create jobs in the EU and enhance rural development if the policy aims at a higher production of biomass from agriculture, forests and so on within the EU. It is inevitable to reduce GHG-emissions from fossil energy in order to keep the temperature rise below 2 degrees Celsius and this will be necessary in order to safeguard biodiversity as well as other environmental issues.

The European Union established the most ambitious sustainability regime for biofuels and bioliquids in the world. RED together with CAP ensures good agricultural practice. In order to not create additional administrative burdens for forest owners, all biomass produced in the forests under the EU Timber regulation needs to be considered as sustainable as this is a significant part of the MS forest legislations.

## 8. EU action on sustainability of bioenergy

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8.1. In your view, is there a need for additional EU policy on bioenergy sustainability?

- ☒ No: the current policy framework (including the sustainability scheme for biofuels and bioliquids, and other EU and national policies covering solid and gaseous biomass) is sufficient.
- ☐ Yes: additional policy is needed for solid and gaseous biomass, but for biofuels and bioliquids the existing scheme is sufficient.
- ☐ Yes: additional policy is needed on biofuels and bioliquids, but for solid and gaseous biomass existing EU and national policies are sufficient.
- ☐ Yes: a new policy is needed covering all types of bioenergy.

8.2. In your view, and given your answers to the previous questions, what should the EU policy framework on the sustainability of bioenergy include? Please be specific

*5000 character(s) maximum*

Differentiate between sustainable production and sustainable use. Biomass sourcing must be compatible with and take into account existing national legislation and international regulation schemes. Carbon sustainability is assured through LULUCF and if biomass is procured from non-LULUCF accounting countries, credible proof can be given, at relevant regional level, that the harvesting rate does not exceed 100%. Forest biomass shall come from legal sources and this is verified via the EU Timber Regulation EC/995/2010. Use of Biomass should be as efficient as possible. All renewable sources are needed in order to cut-off the fossil demand. Instead of having lists with double and quadruple counting the GHG saving should be in focus – regardless of source. To reach the EU 2050 target its vital to use biomass, have new partners and start new trading routes. Mobilisation of biomass is a critical issue. A new policy needs to stimulate farmers and forest owner to active manage their land. New supply chains, infrastructure, and logistics also need to be encouraged.

There is no need for further EU policies but the sustainability criteria as defined from Article 17.3 to 17.7 of Directive 2009/28/EC do not apply to the majority of wastes and residues listed in Annex IX of Directive (EU) 2015/1513. Due to this, biodiesel derived from palm oil produced on holdings made possible because of deforestation can benefit from double counting in incorporation obligations without any sustainability requirements. This needs to be resolved.

## 9. Additional contribution

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Do you have other specific views that could not be expressed in the context of your replies to the above questions?

*5000 character(s) maximum*

Finally, you may upload here any relevant documents, e.g. position papers, that you would like the European Commission to be aware of.

**Thank you for participation to the consultation!**

## **Contact**

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