A sustainable bioenergy policy for the period after 2020

Fields marked with * are mandatory.

Introduction

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[10] 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

* 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

* 1.7. If you are a public authority, can you define more specifically your area of competence?

- national government
- national parliament
- regional government
- regional parliament
- local authority
- governmental agency
- other

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

200 character(s) maximum

Region Skåne

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

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

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	○	◉	○	○	○
Biofuels from energy crops (grass, short rotation coppice, etc.)	◉	○	○	○	○
Biofuels from waste (municipal solid waste, wood waste)	◉	○	○	○	○
Biofuels from agricultural and forest residues	○	◉	○	○	○
Biofuels from algae	◉	○	○	○	○
Biogas from manure	◉	○	○	○	○
Biogas from food crops (e.g. maize)	○	◉	○	○	○
Biogas from waste, sewage sludge, etc.	◉	○	○	○	○

Heat and power from forest biomass (except forest residues)	◉	○	○	○	○
Heat and power from forest residues (tree tops, branches, etc.)	◉	○	○	○	○
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	○	●	○	○	○
Bioenergy based on feedstocks imported from non-EU countries	○	●	○	○	○
Other	●	○	○	○	○

Please specify the "other" choice

200 character(s) maximum

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- BIOGAS from energy crops, agricultural and forest residues should also be
promoted, not only liquid biofuels.

- Fuel from crops can be used with no ILUC effect. The term food crops is
misleading.
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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	◉	○	○	○	○
Grid balancing including through storage of biomass (in an electricity system with a high proportion of electricity from intermittent renewables)	◉	○	○	○	○
Reduction of GHG emissions	◉	○	○	○	○
Environmental benefits (including biodiversity)	○	○	◉	○	○
Resource efficiency and waste management	◉	○	○	○	○
Boosting research and innovation in bio-based industries	◉	○	○	○	○
Competitiveness of European industry	◉	○	○	○	○
Growth and jobs, including in rural areas	◉	○	○	○	○
Sustainable development in developing countries	◉	○	○	○	○
Other	◉	○	○	○	○

Please specify the "other" choice

200 character(s) maximum

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Biogas as transport fuel (biomethane) improves European air quality by
reducing local emissions such as NOx
and particulate matter.
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3.2. Any additional views on the benefits and opportunities from bioenergy? Please explain

2500 character(s) maximum

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The benefits from bioenergy are many. Using bioenergy will substantially
improve our ability to achieve set goals regarding both the environment and
climate change. Bioenergy can be extracted from many different sources, such
as household waste, manure, sewage, forest residues and from algae in the sea,
to mention only some examples. The potential is significant. Many of these
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materials has to be handled by society anyway. If we don't produce bioenergy out of our household waste we will have to find some other solution for our leftovers. Landfill is not a good one. Bioenergy is absolutely crucial if we are to meet set climate goals.

Bio fertilizers
Production of bioenergy gives us the opportunity to, simultaneously, handle our waste, partly solve the problem with air pollution from transports, decrease GHG emissions and also gain bio fertilizers. To produce biogas you can use the method of anaerobic digestion. The remaining material coming out of a digester is rich in nutrients, water and organic carbon, making an excellent organic fertiliser. This can replace mineral fertilisers, a product that relies on intense use of energy and the finite resource phosphor.

Decarbonizing the transport sector
One major challenge in reducing GHG emission is the transport sector. In Sweden a system has been developed for using bioenergy in the form of biogas as vehicle fuel. This is a very successful way if decreasing emissions from transports as well as using society's waste in an efficient way.
In Skåne there is no competition between crops for food and crops for energy. The matter of underutilized land is a more current issue. This land becomes less and less suitable for food production as it deteriorates. If this land instead is used for farming of energy crops, it stays utilized and maintained. In case of need food production a shift of the land is easily made.

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 asnwer 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	○	○	○	◉	○

Change in carbon stock due to deforestation and other direct land-use change in non-EU countries	○	●	○	○	○
Indirect land-use change impacts	○	○	●	○	○
GHG emissions from the supply chain (e.g. cultivation, processing and transport)	○	○	○	●	○
GHG emissions from combustion of biomass (‘biogenic emissions’)	○	○	○	●	○
Impacts on air quality	○	○	●	○	○
Impacts on water and soil	○	●	○	○	○
Impacts on biodiversity	○	●	○	○	○
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 and/or subsidies for specific uses	○	○	●	○	○
Internal market impact of divergent national sustainability schemes	○	●	○	○	○
Other	○	○	○	○	●

Please specify the "other" choice

200 character(s) maximum

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

2500 character(s) maximum

We find that the current discussion of risks are in some ways to narrow. All kind of production is associated with some risk, but with knowledge and careful planning most of them can be avoided.

Forestry
Sweden has, as do all the different member states, certain areas of expertise and certain conditions to take in to consideration. For example, Sweden has a long tradition of sustainable forestry. More about this in 6.2.

Biogenic versus fossil CO2
We find the matter of GHG emissions from combustion of biogas in a vehicle to be none existing. The CO2-emission from combustion are biogenic and should not be mistaken for fossil emissions. The biogenic emissions do not lead to a net gain of CO2 in the atmosphere. Treating biogenic and fossil CO2 as the same hinders the much needed development of renewable energy. In Sweden this is linked to a system of CO2 tax, which has been very effective. More about this in 5.4.

Trade
When it comes to trade and the matter of import and export of energy we are concerned with the risk of double subsidies. If the product is subsidies in one way in the exporting country and in another way in the importing country, it leads to an unbalanced market. With twice the price benefit, imported energy may weaken domestic production. It can also lead to increased transports of energy, which is counterproductive. The different member states must be able to benefit from their unique resources. The EU market must be harmonized and fair to make this possible.

ILUC
Existing EU policies point out certain crops to cause supposed ILUC effects. Consequently, the policy framework is clearly saying that biofuels produced from these crops should not be further promoted. This rules out the great potential of second annual crops. These are one of many examples of how biofuels can be produced from crops with no ILUC effects, with high GHG savings and with a whole range of other benefits to the environment and the society. For example, second annual crops actually enhances biodiversity.

In this context, Region Skåne would also like to point out that it is necessary that member states have ways to efficiently support sustainable bioenergy with reference to their GHG performance, independent of their origin. Sustainable bioenergy, also from agricultural crops, with high GHG-savings due to efficient cultivation and production should not be penalized.

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

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[1] 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	○	◉	○	○	○

GHG emissions from direct land-use change	○	○	◉	○	○
Indirect land-use change	○	○	○	◉	○
Impacts on biodiversity	○	○	◉	○	○
Impact on soil, air and water	○	○	○	○	◉

Any additional comments?

2500 character(s) maximum

All types of bioenergy should be evaluated based on climate reduction potential and sustainability properties. A proper framework for this kind of evaluation was set up in the RED (directive 2009/28/EC). In that sense, GHG emission risks have already been addressed in a very effective way by the existing sustainability scheme. However, with the new rules (directive (EU) 2015/1513) the EU abandoned the effectiveness of the scheme by introducing a division of biofuels into "first generation" and "advanced", based on the type of feedstock. The refusal to accept so called first generation (or "conventional") biofuels has hampered development of biofuels with a high GHG savings potential and low ILUC risk.

Similarly, further promotion of the ILUC factor will NOT be an effective tool to tackle the indirect emissions of the bioenergy sector. ILUC risks should instead be addressed by promoting sustainable production practices, for example by providing incentives for production on currently underutilized land. That would be a more effective way of actually preventing ILUC risks from all types of bio-based industries.

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

• The decrease in use of fossil fuel should always be the focus and the main target. Measures to prevent fossil fuels are as important as measures to increase renewable ones.
• To substantially increase use of bioenergy there is a need for better infrastructure for both production and consumption. This must be addressed.
• Further research and development is key to efficient production and use of energy in the future. The EU has to possibility to, with funds, support and facilitate towards a more effective change in the energy sector.
• Abandon existing approach to ILUC since it is based on questionable modelling
• Calculation of GHG emission reduction should be based on a systems perspective:

Currently, allocation of emissions between biofuels and co-products are based on energy content according to the RED. With current practice, it is normally not possible to include the fact that digestate from advanced biogas production replace mineral fertilizers. Nor is it possible to consider alternative pathways. Using manure as feedstock for biogas production (advanced) could e.g. reduce methane emissions from conventional manure handling systems substantially which is not included today. These two aspects have a high impact on the overall GHG balance for biogas systems as compared to other bioenergy systems. Hence biogas/biomethane as an advanced biofuel is unfairly treated in existing sustainability scheme. Introducing a systems perspective in GHG emission calculations would promote advanced biofuels such as biogas/biomethane and create a more fair comparison between gaseous and liquid biofuels on the market.

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

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?

2500 character(s) maximum

The priority and focus must be on:
- Funds for research and development.
- Creating positive forces towards a change. Make demands on the private sector and research will follow.
- All measures must be aimed at set goals.
- Ensure long-term investment security and stable support mechanisms.

A CO2 tax or levy would be an effective and transparent system and should therefore be introduced as a nonstate-aid support mechanism for low-carbon technologies relating to bioenergy. Sweden has long experience from a CO2 tax system that has made Sweden to one of the world's leading bio economies. However, state aid regulations (overcompensation rules) prevent biofuels from being competitive in relation to fossil fuels. In the recent years, this has been a huge barrier for further development of renewable energy in Swedish transport sector. It is only logical and normal that in order to replace oil products the renewable alternatives will need to be more affordable to the consumer than the oil products they are replacing.

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	○	○	○	◉	○
Change in carbon stock due to deforestation, forest 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	○	○	○	○	◉

Please specify the "other" choice

200 character(s) maximum

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

2500 character(s) maximum

Higher mobilisation of wood, and more use of forest fuels, is a necessary part of a European climate strategy. The existing national forest legislations in EU member states guarantee replanting of forests after harvest. As well as for second annual crops, sustainable production and utilisation of the energy the forest offers are without question possible. This has been shown by the

Swedish way of forestry for decades.

EU policies should encourage good practices rather than counteract bioenergy from forests. Lessons can be learned from the Swedish experience of biomass mobilisation and increased forest productivity. Since 1926 the annual harvest has doubled, while at the same time forest growing stock has increased by 80 percent.
Environmental consideration is one of the strengths in Swedish forestry. A care for values like sustainability, biodiversity and also the recreational value of the forest are as necessary now as in the future. There is no conflict between these values and an increased production of bioenergy.

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

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	●	○	○	○	○	○	○	○	○	○
Avoid environmental impacts (biodiversity, air and water quality)	○	●	○	○	○	○	○	○	○	○
Mitigate the impacts of indirect land-use change	○	○	○	○	○	●	○	○	○	○
Promote efficient use of the biomass resource, including efficient energy conversion	○	○	○	○	○	○	○	●	○	○
Promote free trade and competition in										

the EU among all end-users of the biomass resource	○	○	○	○	○	○	●	○	○	○
Ensure long-term legal certainty for operators	○	○	●	○	○	○	○	○	○	○
Minimise administrative burden for operators	○	○	○	○	○	○	○	○	●	○
Promote energy security	○	○	○	○	●	○	○	○	○	○
Promote EU industrial competitiveness, growth and jobs	○	○	○	●	○	○	○	○	○	○
Other	○	○	○	○	○	○	○	○	○	○

7.2. Any other views? Please specify

2500 character(s) maximum

8. EU action on sustainability of bioenergy

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

As the biggest user and producer of bioenergy in the EU, Sweden takes a close interest in the updated bioenergy sustainability policy. Region Skåne has the largest production of biogas in the country and the public busses are to an extent of 90 % driven by biomethane. The public transports are to be 100 % fossil fuel free by 2020. Many investments have been done, both by public and private sector, in the region to strengthen and increase sustainable production of bioenergy.

The possibility to utilize household waste, manure and second annual crops to produce renewable energy for cars, busses and heave duty vehicles in a cost-efficient way are of most importance for regional growth and decrease of GHG emissions.

As a region with a large agriculture sector and large production of organic foods, the demand for bio fertilizers are increasing. This demand can to a large extent be fulfilled trough the production of biogas.

The key objectives should be:
- Ensure long-term investment security and stable support mechanisms.
- EU policies should encourage good practices rather than counteract bioenergy from forests and crops with no actual ILUC effect.
- The decrease in use of fossil fuel should always be at the focus and the main target. Measures to prevent fossil fuels are as important as measures to enhance renewable ones.
- To substantially increase use of bioenergy there is a need for better infrastructure for both production and consumption. This must be addressed.

- Further research and development is key to efficient production and use of energy in the future. The EU has to possibility to support and facilitate with funds towards a more effective change in the energy sector.
- Calculation of GHG emission reduction should be based on a systems perspective.
- Sustainable bioenergy, also from agricultural crops, with high GHG-savings due to efficient cultivation and production should not be penalized. Abandon existing approach to ILUC since it is based on questionable modelling
- The EU market must be harmonized and fair.

9. Additional contribution

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

Countries like Sweden and Finland are forerunners in terms of large scale deployment of bioenergy and meeting ambitious climate targets. With many years of experience and research these countries have developed sustainable ways of producing bioenergy, including biomass from forestry and agricultural sectors. These countries can serve as good examples on how the EU sustainability policy should be improved and evolved. In setting up the new EU bioenergy sustainability policy post-2020, the EU Commission and other EU institutions should learn from those countries with the highest level of knowledge and experience in terms of bioenergy deployment.

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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