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

* 1.2. If you are a private or public enterprise, could you please indicate your principal business sector?

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

* 1.3. If you are a private or public enterprise, could you please indicate the size of your company?

(Medium-sized enterprise: an enterprise that employs fewer than 250 persons and whose annual turnover does not exceed EUR 50 million or whose annual balance-sheet total does not exceed EUR 43 million.
Small enterprise: an enterprise that employs fewer than 50 persons and whose annual turnover and/or annual balance-sheet total does not exceed EUR 10 million.
Micro-enterprise: an enterprise that employs fewer than 10 persons and whose annual turnover and/or annual balance-sheet total does not exceed EUR 2 million.)

- large enterprise
- medium-sized enterprise
- small enterprise
- micro-enterprise
- I don't know

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

200 character(s) maximum

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Metsäliitto Cooperative, Metsä Group
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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

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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Use of industrial wood or other raw materials suitable for material product
use should not be subsidized or incentivized for bioenergy production in any
energy form or in any incentive form.
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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

Renewable energy targets have led to high feed-in-tariffs and incentives to burn biomass with very poor efficiencies to condensing electricity in some MS.

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

2500 character(s) maximum

In our view, additional future bioenergy generation is unlikely to be a major driver for further growth and jobs ,or for further investments in rural areas. This because a clear majority of the heat generation needed in rural areas has already been converted from fossil fuels to biomass (or other renewable) based generation. However, in connection to investments in new or increased production of bio-based materials there is a possibility to further increase efficient bioenergy generation from certain side-streams which are not suitable for material product use in line with the cascade use principle and the aims of circular economy.

For energy purposes, in some cases modest support may be needed to enable mobilization of forest residues and other biomass raw materials not suitable for material product use. Even in this case, the possible modest support should be eligible only for energy uses in high efficient power plants and strict time limitations should be applied.

Limited sustainable raw materials need to be used in a wise and resource efficient way. The valuable raw material should be primarily used for material product use and only at the end of the life cycle for energy use. Taking into account the global challenges, such as population and consumption growth and climate change, there will be scarcity of biomaterials in the future, but there are multiple sources of renewable energies.

GHG reduction is well justified when credible proof is given that there are systems for monitoring, reporting and verification in place ensuring that the harvesting rate in a country is below 100% in the long term. Thus, LULUCF accounting is a sufficient proof and justification to biomass carbon neutrality in energy production.

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

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Administrative costs / Red tape
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4.2. Any additional views on the risks from bioenergy production and use? Please explain

2500 character(s) maximum

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Competition between different uses of the same raw materials: The legislative
and policy framework should establish a level playing field for material
product uses vs other uses of forest biomass. Current and new bioproducts can
substitute fossil and non-renewable materials and products. The policy
framework should promote smart, resource efficient, and sustainable use of
renewable raw materials. Instead of subsidizing the use of wood for energy in
electricity, heat and transport fuels sectors, measures to enhance the
availability of wood and forest residues are needed. Heat, electricity and
transportation fuels based on solid and gaseous biomass should be produced
efficiently and only from such side streams and parts of wood that are not
suitable for material product use in line with the cascade use principle and
the circular economy.  The Member States should not support but to avoid the
use of biomass in condensing power plants and in new conversions of coal
plants with the current low efficiencies.


Issues relating to carbon stock should be accounted in similar way as today in
LULUCF. This ensures that forest remains forest after harvesting. The EU
should use climate diplomacy to expand LULUCF approach to other non-EU
countries.
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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

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The current national and EU policy framework and existing tools to demonstrate
biomass sustainability are sufficient and there is no need to create
additional layers of regulation and administrative burden. The market needs a
coherent and sound legal framework to establish a level playing field for all
biobased industries.
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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

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The current incentives for advanced biofuels, e.g. Annex IX  of the ILUC
Directive, lead to a situation where industrial wood i.e. pulpwood is
incentivized and hence directed to direct energy use on the cost of material
product use of pulpwood (Annex IX part A point (q) where pulpwood is not
excluded from other lingo-cellulosic material). This  may disturb competition
on the raw material markets and promotes direct energy use of industrial wood.
The future framework should promote resource efficient use of valuable raw
materials in line with the cascade use principle and the circular economy,
and it should not incentive direct energy uses of industrial wood.
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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

Partial one-off public funding / risk sharing of investments in demonstration and pilot plants enables and speeds up development and commercialization of new technologies. Continuous subsidies in the production phase in any form (incl. mandatory blending quotas) should be avoided, since these may lead to deployment of non-competitive technologies and may cause unforeseeable long-term economic and/or environmental impacts to society. The possible subsidies should be strictly limited in time.

It is important to have truly (partial) risk bearing partial funding, i.e. the one-off partial investment subsidy is not dependent of the new technology being successful or not. Herewith this innovation subsidy truly reduces the risk of new technology investor which anyhow needs to bear majority of the commercial risk. In this respect the previous
NER300 scheme was not optimal as the support it would have provided was dependent on successful production
phase of the new technology investment.

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	○	○	○	○	○

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

2500 character(s) maximum

Avoidance of negative impacts of forest management to water, soil and biodiversity are key issues in sustainable forest management. The EU Member States and several other European countries are committed to Forest Europe process (criteria and indicators of sustainable forest management) and moreover, national forest legislation and EU-level legislation (e.g. nature legislation, EU Timber regulation, RED) supplemented by global forest and chain of custody certification as well as other voluntary tools and schemes ensure that forests are managed sustainably. The EU Timber Regulation (EU TR) covers the legality of wood and wood-based products produced in and imported to the EU. That is tightly linked to sustainability.

Competition between different uses of the same raw materials: A competitive mechanical and chemical wood based industry is a resource efficient wood user as it produces a variety of different materials, pulp and chemical products from trees and side-streams of the production. Bioenergy is produced from low-value parts of the tree such as branches and tree tops as well as from certain side streams not suitable for material product use. The legislative and policy framework should establish a level playing field for material product uses vs other uses of forest biomass. Current and new bioproducts can substitute fossil and non-renewable materials and products. The policy framework should promote smart, resource efficient, and sustainable use of renewable raw materials. Instead of subsidizing the use of wood for energy ie combustion of wood to generate electricity, heat and transport fuels, measures to enhance the availability of wood and forest residues are needed.

Carbon stock issues should be accounted in similar way as today in LULUCF. This ensures that forest remains forest after harvesting. The EU should use climate diplomacy to expand LULUCF approach to other non-EU countries.

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	○	○	●	○	○	○	○	○	○	○

Please specify the "other" choice

200 character(s) maximum

Promote circular economy and resource efficiency.

7.2. Any other views? Please specify

2500 character(s) maximum

Ranking these objectives is challenging as many of them are closed linked to each other's and cannot be considered as alternatives. Policies should be integrated in a way that it supports global competitiveness of the EU and sustainable development (economy, social and environment) in general.

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

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

Biobased companies active in the forest industry value chain have a long history of co-operation. We contribute together significantly to the bioeconomy and circular economy and generate the greatest possible net gain to the environment, the society and the tax payer whilst contributing to the EU's job and growth agenda. The policy framework should promote efficient use of

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valuable raw materials and better utilization of industrial side streams for
material product use. This enables and promotes innovation, industrial
symbiosis and creation of long value chains.

Forest industry is a fast growing sector for the needs of growing global
population and with rising standard of living. The demand for sustainable
material products is increasing strongly and the limited raw material
resources need to be used in a wise and resource efficient  way in line with
the circular economy aims.  Hence, the potential for future bioenergy growth
is limited.

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

fa685483-9c79-45c3-b757-ae602297b985/RED_vastaus_Mets__Group_toukokuu_2016.pdf

Thank you for participation to the consultation!

Contact

✉ SG-D3-BIOENERGY@ec.europa.eu