



Confédération Européenne des Propriétaires Forestiers
Confederation of European Forest Owners
Zentralverband der Europäischen Waldbesitzer

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CEPF position on the sustainability of forest based biomass

The EU Renewable Energy source directive (RES) imposes stretching renewables targets for 2020 across the EU. The growing energy demand poses a significant challenge to forest based biomass as one of the major source of renewable energy in Europe. Particular concerns have been raised over the need to ensure the sustainability of biomass. Legally binding sustainability criteria for liquid biofuels have been implemented. Furthermore there is provision in the directive to take further actions on the sustainability criteria for solid biomass.

The Confederation of European Forest Owners (CEPF) has a long history in reinforcing sustainable development and management of European forest resources. These practices and the existing national forest legislations set a solid basis for sustainable production of biomass in the EU. However, prognoses for a boost in demand of biomass for energy purpose add certain pressure to the European forest sector in terms of the availability of wood and anticipated increase of imports. This supports further development of a sustainability scheme in order to ensure a level playing field as well as to address the environmental concerns, in particularly the global loss of biodiversity.

CEPF encourages the Commission to consider the following points in further course of action:

- A large share of the unused biomass potential can be found in small-scale private forests. Hence, a sound mobilization of the under-used domestic biomass should be further supported. On the basis of the latest data (e.g. NREAPs¹), however, it can be foreseen that by 2020 the demand for solid biomass in the EU cannot be covered solely by the domestic production. This development will inevitably lead to an increase of imports. The condition under which the imported biomass is produced does not fulfill the existing sustainability standards in the EU. Further more imports of biomass bear the risk of being an entry point for alien invasive pests and pathogens, e.g. pine wood nematodes.
- Over the last two decades the Forest Europe² process developed commonly accepted principles of sustainable forest management (SFM). These principles and good practice guidance cover not only the production of biomass for energy but all kinds of forest products.
- Any new EU legislation on sustainability criteria for biomass should be developed closely following the Forest Europe process, the national legislation and the certification schemes. Moreover, they should be closely interlinked with the existing criteria for liquid biofuels as outlined in the RES directive.
- Almost 50% of the European forests comply with the voluntary certification standards PEFC³ and FSC⁴. The voluntary certification schemes in addition to the national legislation provide a strong platform for sustainable forest management (SFM) in Europe.

¹ National Renewable Energy Action Plans

² Former MCPFE process

³ Programme for the Endorsement of Forest Certification





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- Solid biomass utilized for energy production does not only originate from forest and forestry (residues from forest based industry), but also from agriculture and other sources. Sustainability criteria covering only a specific type of solid biomass, would lead to a shift in the demand for cheaper and unsustainable produced biomass. This would distort the biomass market and weaken the intention of a regulation. Sustainability criteria should take all types of solid biomass into consideration in order to unfold the entire outreach.
- Energy produced from biomass will compete with other energy sources as e.g. gas and oil. Introducing sustainability criteria for biomass without focusing on the sustainability of other energy sources as well could weaken the competitiveness of biomass as a renewable energy source and lead to a distortion of the energy market.
- A legal framework at the EU level, which solves the problems with trading and importing of unsustainable produced biomass, is needed. However, enough room has to be left for the Member States to adjust already existing and successfully working schemes to a potential new European framework. Therefore CEPF calls on the principle of subsidiarity.

When it comes to the practicability and feasibility of any regulation the large number of 16 million forest owners in the EU must not be forgotten. The administrative burden of an overregulation and the thereof resulting costs might exclude a great number of SMEs from the market and lead to even higher imports of biomass. This may have negative impacts on the economic and social prosperity of Europe's rural areas.

CEPF supports the use of sustainable produced biomass for energy production as it creates income and employment in rural areas, substitutes fossil fuels and decreases the dependency on energy imports. Additionally, the utilization of solid biomass for energy production helps to mitigate climate change due to its neutral carbon balance. Thus, the use of sustainable produced biomass in Europe should be further promoted.

⁴ Forest Stewardship Council

