

## Public consultation on the preparation of a report on additional sustainability measures at EU level for solid and gaseous biomass used in electricity, heating and cooling

### Meta Informations

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User name

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Status

N

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en

### IDENTIFICATION

Your profile

Organisation

Is your organisation registered to the "Register of Interest representatives"?

Yes

Name of Organisation or Public authority

Quaker Council for European Affairs

Which type of Organisation?

Non Governmental organisation

Main field of activity

Other

Which other main field of activity?

Peacebuilding, Human Rights, Sustainability

What is your country of residence/country where your organisation or institution is based?

BE - Belgium

### A. DEVELOPMENTS IN THE BIO-ENERGY SECTOR

A.1. Do you consider that the EU amounts of imported solid biomass from outside the EU, for the heating / cooling and electricity sectors, will

Don't know

change in the coming years to meet renewable energy targets by 2020?	
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A.2. Please identify the most important region(s) (maximum 3) outside the EU from where you expect the majority of solid biomass imports to come from for the heating / cooling and electricity sectors by 2020?	Africa Central and Southern America Russia
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Please indicate the reasons for your choice of import regions, as well as specific countries (if relevant) and sources of information (if any)

A.3. Which types of solid biomass are most likely to be imported from outside the EU until 2020 for the heating and cooling sector and the electricity sector?	Don't know
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Please explain your view

Please provide any additional information to explain your view on part A

**B. NEW POLICY DEVELOPMENTS RELATED TO BIOMASS SUSTAINABILITY**

B.1. Do you consider that the new policy developments listed in section B of the consultation background document contribute or will contribute to ensure the sustainability of solid and gaseous biomass used in the EU for energy purposes?	Yes
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Please identify the most important developments (maximum 3) that contribute / will contribute to ensure sustainability of biomass supply in the EU?	Possible inclusion of LULUCF activities in the EU GHG emissions reduction commitment 10 years strategic plan of the Convention on Biological Diversity Reducing Emissions from Deforestation and Forest Degradation (REDD)
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Please indicate the reasons for your choice

Whilst only 3-5% biomass is currently imported, this will likely increase, given that half of the binding 20% renewable energy target by 2020 is expected to come from biomass (demand for which cannot be met within Europe). Without binding rules on sustainability, member states can import ever more biomass from third countries without considering sustainability of production, social impacts or biodiversity, or being able to effectively measure GHG life-cycles. REDD, LULUCF and the CBD are potential drivers toward sustainability, but NOT yet sufficient to ENSURE genuine sustainability.

B.2. Are there other new policy developments not listed in section B of the consultation background document, that in your opinion, contribute / will contribute to further ensure the sustainability of solid and gaseous biomass used in the EU for energy purposes? Please provide details.

**C. CONSIDERATION OF THE IMPACTS OF NATIONAL / REGIONAL BIOMASS SUSTAINABILITY SCHEMES IN THE EU**

C.1. According to your knowledge, are there regional / national rules / regulations (in place or under development) that create obligations or	Don't know
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contribute (financially or otherwise) to the sustainability of solid and gaseous biomass for energy uses at national and/or regional level?	
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**D. CONSIDERATION OF ADDITIONAL EUROPEAN MEASURES**

D.1. In your view, should the EU take additional measures regarding the sustainability of solid and gaseous biomass for electricity, heating and cooling?	Yes
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What is the main reason?	The EU policy framework is inadequate to ensure biomass sustainability
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Please explain your view	
The existing EU policy is modeled on RED sustainability criteria which are too weak, incomplete (especially with regard to ILUC) and unsuited to biomass. There is also a lack of good forestry practices criteria/ no consideration of forestry/logging related emissions (e.g. the negative impacts of increased removal of forest residues and stumps on soil organic matter and soil carbon stocks are largely ignored). Increasing EU demand may perversely incentivize third countries to use primary forest.	

What would be the most appropriate measure? The recommendations established in Report COM(2010)11 should:	other
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Please specify which other most appropriate measure?	
Binding criteria are required, for energy producers <1 MW, and for all biomass imports, as the measures simply replicate the existing inadequacies in RED (especially wrt ILUC: <a href="http://bit.ly/eSCVgs">http://bit.ly/eSCVgs</a> ).	

Please explain your view	
A binding renewables target, but no binding sustainability criteria for biomass, threatens to encourage the cheapest and most destructive forms of biomass production. Biomass harvesting guidelines must ensure a) enough coarse woody debris is left on the ground, to ensure continued soil productivity, b) enough standing dead trees remain to promote biodiversity ( <a href="http://bit.ly/ijbned">http://bit.ly/ijbned</a> ). We must ensure weakening carbon sink capacity does not outweigh potential GHG reductions ( <a href="http://bit.ly/hml7X1">http://bit.ly/hml7X1</a> ).	