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**INFORMATION NOTE**

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from: General Secretariat of the Council  
to: Delegations  
Subject: Sustainability criteria for biomass  
- Information from the Swedish delegation, supported by the Austrian, Finnish, Slovenian, Latvian, Lithuanian and Estonian delegations

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The increasing demand for renewable energy will challenge European forestry and increase the need for imports of biomass. In this light we all agree on the need to address certain sustainability aspects. The Commission is currently analyzing the need for an EU-wide sustainability scheme for energy uses of biomass. Based on our long-term experience of sustainable forest management we would like to present some common points and concerns about the detailed and harmonised sustainability criteria for biomass currently under consideration. For the reasons outlined below we think that any proposal from the Commission must take into account the diversity in forestry, and allow for detailed criteria to be defined on a national level.

- Forests provide diverse products and services. In order to be able to manage forests nationally in a coherent way, all forest products should be controlled through the same guidelines and regulations. One particular forest usually gives raw material for several different purposes, and further along the refinery process this diversification continues. Different parts of the tree (stemwood, branches, crowns, stumps, bark) end up in different refining chains and could be used to generate energy in various processing stages (e.g. sawdust or black liquor). Therefore it is not reasonable to introduce a separate, tailor-made sustainability scheme for one particular end use. Forest biomass that end up in energy production should not be subject to different sustainability requirements than e.g. timber or pulp wood.
- If the EU are to introduce a sustainability scheme, a challenge would be that the scheme must be applicable at global level. Forest and forestry are characterized by great diversity, both within the EU and globally and ranges from carefully managed, slow-growing natural forests to intensive tree plantations. Given the varying national and local conditions, we question the possibility to establish harmonised and detailed sustainability criteria for forest biomass that are relevant, effective and equitable while guaranteeing that the intended environmental gains are fulfilled.
- Sustainable forest management in Europe is already controlled through various global and EU-level environmental commitments, national policies and legislation, forest management planning and forest management guidelines and supported by voluntary certification schemes (PEFC and FSC). At the pan-European level the Forest Europe process has promoted sustainable forest management and developed commonly accepted principles. Verification of the sustainable origin should be done using existing national, public or government-based law enforcement, monitoring and inventory systems. In our countries sustainability is a part and parcel of the regulatory framework, and in this context, already addressed by regulation 995/2010 laying down obligations of operators who place timber and timber products on the market.

- If some kind of EU-sustainability scheme for forest biomass would be introduced, the greenhouse gas-calculation methods should be simple. Criteria ought to be clear, quantifiable and verifiable, while avoiding unreasonable administrative burden for the actors and for verifiers. The method must also be different from current methods in the Renewable Energy Directive which are not relevant for forests. The present criteria for biofuels focus on greenhouse gas emissions from a specified area from which the biomass originates, which is hardly feasible in forestry and does not give a fair and complete picture of net emissions from forestry and active biomass use. Carbon stock in forestry must therefore be analysed in a landscape perspective. Criteria ought to be clear, quantifiable and verifiable, while avoiding unreasonable administrative burden for the actors and for verifiers. Forestry must also be seen in a much longer time perspective than agriculture. In Northern Europe forestry has a time scale ranging from 60 to well over 120 years, while the present criteria are designed to reflect that cultivation and harvest takes place on the same or next year.
- Forestry in our countries is dominated by small family businesses and a great quantity of the unused domestic biomass can be found in small-scale private forests. In Europe there are on total around 14 million forest owners. A separate sustainability scheme or verification procedure would bring additional administrative costs and risk the financial feasibility of small businesses in Europe. A high administrative burden might discourage producers from certifying and thus not offer their products to the market, although they are sustainable. It is also noteworthy that the forest owner does not know the end use of the tree at the point of harvest. This is one significant reason why all products from forestry should be subject to same criteria.
- Import of solid biofuels to the EU is likely to increase in the light of the expanding demand for biomass. The EU should continue to strengthen global efforts to promote socially, economically and environmentally sustainable forest management. In a global perspective, there may even be other criteria to monitor such as water management, water pollution, erosion etc.; factors not covered by current criteria.

- The consequences of applying an ill-adjusted system for sustainability criteria in Member States that are highly dependent on indigenous biomass may be devastating. As an illustration, Sweden's high share of renewable energy (approximately 40 percent of total energy use) is to 55 percent made up by biomass. As a share of the overall energy mix it constitutes 28 percent. In our countries biomass is largely used in district heating and is a natural alternative to coal. If our forestry is penalized in such a system, the produce could not be exempt from CO2 taxation, which would hit small producers very hard, or be calculated against our national renewable energy targets, which would risk the fulfilment of the EU 20 percent goal.
- An efficient use of sustainable biomass is an essential component for reaching the EU climate and energy objectives, both for producing and import countries. Introducing further obstacles will make the fulfilment of the EU climate and energy goals more costly, without achieving the environmental gains. We welcome all efforts to ensure availability of biomass for energy use and realizing the massive potential for solid biomass in the EU. Sustainably produced biomass for energy can create employment possibilities in rural areas, substitute fossil fuels and decrease the dependency on energy imports.

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