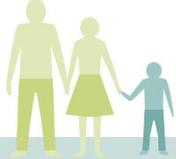




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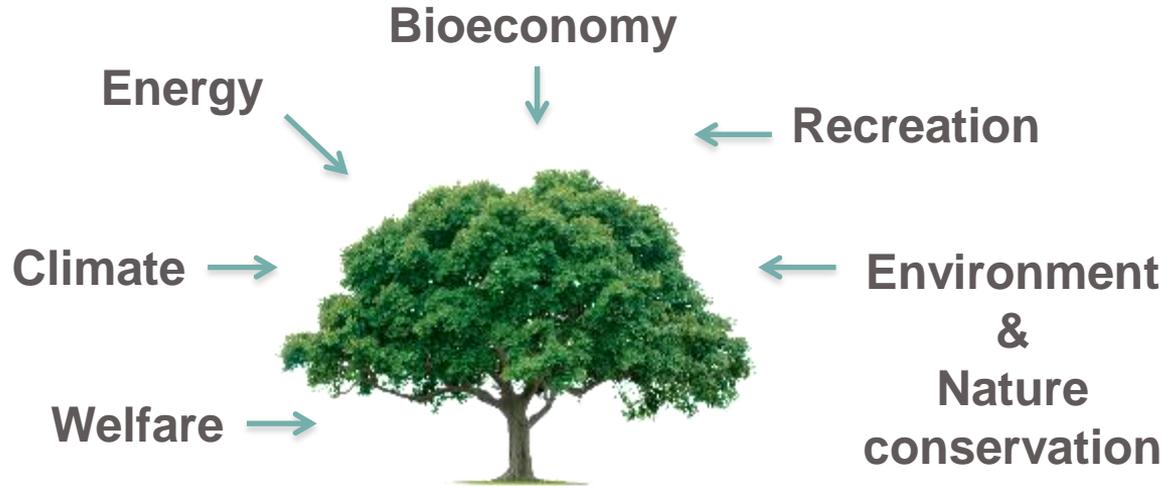


# Confederation of European Forest Owners



## Views on the recast of the Renewable Energy Directive

# Increasing pressure towards forestry



- Sustainability criteria
- Questioning climate benefits
- Cascade use principle



## Current legislative framework ➤ Current state of Europe's forests

Forestry is Member State competence based on **national forest and nature laws**, strategies and voluntary tools already **regulating the use of forests**.

These tools are based on the concept of **Sustainable Forest Management** as developed under **FOREST EUROPE**

Market-based tools such as **Certification schemes**

Plus a number of **EU regulations**, eg: LULUCF under Kyoto, REDI without sustainability criteria for forest biomass or Natura2000

- In past 25 years EU **forest area increased** by 9 million ha = size of PT
- In past 25 years EU's **forest stock increased** by 7.4 billion m<sup>3</sup> = 38%
- More than 90% of forests are **natural or semi-natural, mixed species** stands dominate
- 21% of EU's forests are included in **Natura2000** and amount of **deadwood** in forests is increasing
- 90% of EU **timber** need is supplied from our own forests
- 4 million **employees**, 8% of EU's manufacturing GDP
- Growing forests **sequester 10%** of EU's total GHG emissions
- 90% of the forests are available for **recreational** purposes



# Forest owners views on the REDII bioenergy sustainability criteria

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## Strengths of the Commission proposal:

- Recognition of existing forest legislations and systems via risk-based approach;
- No cascading use principle in the legislation

## Weaknesses of the Commission proposal:

- Risk-based approach's second level too narrow as regards to forest holdings. Should be a broader sourcing area.
- EC concluded in the impact assessment that there is no need for criteria 4 on soil quality and biodiversity is covered in the criterion 3;
- Criterion 5 on long-term production capacity is not static, and with sustainable forest management both productivity and harvesting can increase. Moreover, strict requirements of sustainable forest management criteria are not consistent with the subsidiarity principle and do not respect the competence of EU Member States on forests.

# Advantages of the Risk-Based Approach for forest bioenergy

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## An improved RBA with simple and clear criteria would:

- acknowledge and respect MS competence on forest policy
- ensure further mobilisation of EU grown biomass
- decrease dependence on pellet imports overseas
- Do not embed cascading use principle to the directive – unacceptable to exclude certain feedstock types, e.g. stemwood or thinnings, as this would mean a planned economy where the forest owner cannot choose freely where to sell her/his wood

→ crucial that COM ENVI is in line with the Commission and COM AGRI when deciding about sustainability articles



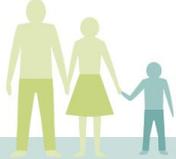
# Conclusion

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- There is no reason and not any valid argument for the implementation of sustainability criteria for solid biomass
- If there is somehow a need for rules concerning this issue, smart solutions – based on a risk based approach – are necessary.
- This approach has to be verified on national level considering existing data.
- No cascading use principle in the legislation



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**Thank you!**



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