

# A sustainable bioenergy policy for the period after 2020

## Position of the European bioenergy sector represented by AEBIOM

May 10th, 2016

## Executive summary

**A**EBIOM, the common voice of the European bioenergy sector, welcomes the initiative of the European Commission to define an EU sustainable bioenergy policy for the period after 2020. AEBIOM has long been calling for the introduction of a common, harmonised European framework for all bioenergy. For this to be successful, it must take into account the current situation on the ground, as well as the sectoral diversity covered by bioenergy technologies.

All EU scenarios show that biomass is a key component of EU 2020 and 2030 renewable energy targets and the 2050 decarbonisation objective. Key organisations, such as the International Energy Agency, indicate that *"Bioenergy has a key role to*

*play in low carbon energy systems<sup>1</sup>*". After the COP21 agreement, the EU should support the dynamism and innovation of a key sector for renewable energy production.

The bioenergy sector is characterised by hundreds of thousands of small economic operators. This makes it essential for future EU policy to reach a balanced and non-bureaucratic approach. The future EU sustainable bioenergy policy should address all issues from the beginning in a pragmatic and efficient way and not open the door to never-ending revisions and/or unclear outcomes.

In this respect, AEBIOM answers to the different sections of the consultation as follows:

<b>Role of bioenergy in the achievement of EU 2030 climate and energy objectives</b>	AEBIOM considers that bioenergy should continue to play an important role in the renewable energy mix, together with an increase of other renewable energy sources.
<b>Perception of different types of bioenergy</b>	All sustainable bioenergy should be further promoted.
<b>Benefits and opportunities from bioenergy</b>	Biomass is not only essential to achieve EU energy and climate targets, but is also a key sector for growth, jobs, innovation, competitiveness, energy security, energy affordability and rural area activities. AEBIOM regrets that the list proposed by the European Commission did not take into account the reduction of household energy bills and the boost given to rural areas, which are actually key benefits provided by the sector with and for EU territories.
<b>Risks from bioenergy production and use</b>	Existing legislations (national/EU) and certification systems allow for potential risks related to bioenergy developments to be addressed and mitigated.
<b>Effectiveness of existing EU sustainability scheme for biofuels and bioliquids</b>	The EU sustainability scheme for biofuels and bioliquids has been effective in addressing the risks identified through minimising the administrative burden. However, the European biofuel industry has been negatively impacted by political uncertainties and a lack of long-term policy perspectives (cf. ILUC debate). In addition, this policy has failed so far in promoting a successful development of advanced biofuels.

<b>Effectiveness of existing EU policies in addressing solid and gaseous biomass sustainability issues</b>	Several EU policies and legislations addressing identified potential risks are in place.
<b>Is there a need for an additional EU policy on bioenergy sustainability ?</b>	AEBIOM is in favor of the introduction of an EU harmonised sustainability policy for all bioenergy. This would contribute to secure investments, to create an level playing field and to answer concerns on related future developments.

What should the EU policy framework on the sustainability of bioenergy include? AEBIOM, along with its members, has identified the following key points that should set the future EU sustainable bioenergy policy:

**Define sustainability rules based on biomass types and categories.** Today, all types of biomass can be used in the three main energy sectors (H&C, electricity, transport). Taking a concrete example, the same woodchips can be used to produce heat, electricity and lignocellulosic biofuels. In this context, regarding the raw material sustainability, it is important that the Commission takes an approach based on the biomass types and categories rather than on the energy end use or form.

**GHG emissions reduction.** Bioenergy contributes to climate change mitigation. In order to make this contribution clear and ambitious, AEBIOM is in favor of the EU policy setting a GHG emissions savings threshold for all bioenergy (60% may be relevant and appropriate). The calculation methodologies should be the ones already endorsed by the European Commission and should be set for the period 2020-2030 in order to provide certainty to investors.

**Land sustainability criteria for agricultural biomass.** The biofuels / bioliquids sustainability land criteria set by the EU RES directive were mainly established for agricultural biomass. This biomass can be used for producing heat, electricity or biofuels. This is why AEBIOM is of the views that these criteria should be maintained and their scope extended to all primary agricultural biomass, irrespective of their final energy use.

**Risk based approach for forest biomass.** Forestry is not an EU competence. However, it is essential to ensure that forest biomass used for energy purposes does not lead to environmental concerns. To this aim, AEBIOM supports the Risk Based Approach (RBA) at macro level (regional or national). This should address possible risks related to forest resources, carbon in forests and forest ecosystems (biodiversity, soil, water...). It should consist in listing and explaining the existing tools in place at national/regional level to address and monitor the risks identified and of evaluating whether these tools allow for the mitigation of risks.

**Installations concerned.** AEBIOM has been leading the EU project BASIS, looking at energy installations consuming woodchips with a fuel capacity over 1MW. This project shows that the 20MW fuel capacity threshold represents 14,8% of the installations and 73,7% of woodchips consumption. This share remains close (75,8%) also when considering pellets. AEBIOM is of the views that this threshold should be considered in the EU policy.

**Recognition of voluntary schemes.** Voluntary schemes should have the possibility to be recognised by the Commission if they meet the EU requirements, following the same approach as biofuels voluntary schemes recognition.

- Access to AEBIOM full answer to the consultation [HERE](#)

- Access to AEBIOM position on "A sustainable bioenergy policy for the period after 2020" [HERE](#)



The European Biomass Association (AEBIOM) is the common voice of the bioenergy sector with the aim to develop a sustainable bioenergy market based on fair business conditions in Europe.

AEBIOM is a non-profit Brussels based international organisation founded in 1990 that brings together 29 national associations and around 90 companies from all over Europe thus representing more than 4000 indirect members including mainly companies and research centers.