

### Solid biomass Sustainability Criteria

The European pulp and paper industry is a significant user of wood, a natural and renewable raw material. Over years, CEPI 's members have continuously committed to use raw materials – especially wood fibre – that comes from legal and sustainable sources. Such a commitment is increasingly third party verified according to the standards and principles of credible independent certification systems<sup>1</sup>.

In 2008, on top of the industry's strong commitment to only source legal wood<sup>2</sup>, 59 % of the wood used by the European pulp and paper industry was certified by one or more of the credible independent forest certification schemes, operating in Europe and this share is growing.

In the context of Europe's climate change policy and of the ambitious targets set in the field of renewable energy sources, CEPI welcomes and supports the need to link the achievement of the 20% share of renewable energy target to sustainability requirements applicable to both liquid biofuels for transport and solid biomass for the generation of heat and power.

From CEPI point of view, such sustainability requirements are crucial for the following reasons:

- It would firm up the true environmental and climate benefits of the EU ambitions in the field of renewable energy sources
- It would guarantee the sourcing of legal and sustainable feedstocks for the production of energy, not leading to over-exploitation.
- It would further incentivise the producers of feedstocks from agriculture, forestry, fisheries and aquaculture to manage and source sustainable resources, irrespective of the final use of them
- It would complement in a coherent manner other EU policies, for example on Green Public Procurement

Therefore, CEPI is willing to contribute to the elaboration of the forthcoming sustainability criteria for solid biomass that are due for the end of 2009, and urges the Commission to take into consideration the following key principles:

- Renewability can only be assured if the total consumption of feedstocks does not exceed the growth and regeneration.
- Sustainability criteria cannot undistinctly and equally apply to all kind of feedstocks. The management and sourcing of biomass from Europe's forests is in many respects different from annual agricultural crops or from the harvest of marine resources. "One size fit all" sustainability criteria would weaken the environmental and climate benefits of the proposed policy.

<sup>1</sup> CEPI position on Forest Certification (FOR/063/05 final)

<sup>2</sup> CEPI 6 principles for legal logging, Legal logging Code of Conduct for the paper industry, November 2005



- Sustainability criteria that are relevant for certain types of forests and sources of feedstocks (in particular, tropical forests) and certain management practices might be irrelevant and create an unnecessary burden on the European producers and users of solid biomass, be it as raw material or as a resource for energy generation. As an example, the sustainability criteria applicable to woody biomass should acknowledge that forests are increasing, both in surface and volume, and that land rights are firmly established. They should as well recognise that no inappropriate conversion of forest land, especially to energy crops, is taking place in Europe, hence making sustainability criteria to prevent land conversion irrelevant..
- The future sustainability criteria for biomass should take stock of all the existing achievements and tools that already exist in Europe, for example the Criteria and Indicators and the Pan-European Operational Level Guidelines for Sustainable Forest Management, elaborated and approved at the Ministerial Conferences for the Protection of Forests in Europe, and the credible independent forest certification systems that build on consensus-based standards and principles for responsible stewardship of forests.
- The sustainability criteria for solid biomass should only refer to well-accepted concepts. In that context, making any reference to “High Conservation Value Land” or “High Conservation Value Forests” would be questionable, since there is no consensus among stakeholders about the meaning and the use of such concepts.
- The sustainability criteria should contribute to a level playing field on the solid biomass markets. A balance should be found between the need to guarantee the sustainability of solid biomass, and the indispensable competitiveness of both the industries using natural resources to contribute to society’s welfare and the renewable energy sector.
- The total efficiency, in particular the carbon efficiency, of biomass-based energy should be properly assessed.
- From a McKinsey study for CEPI done in 2007<sup>3</sup>, it comes clearly that massive additional amounts of wood will have to be mobilised in order to achieve the 20% share of renewable energy by 2020. The sustainability criteria should therefore be developed in a way that doesn’t deter of mobilising the indispensable feedstocks to fulfil the policy goals and to keep competitive biomass-based industries.
- The forest industry has a long experience in sustainable management and sourcing of resources and calls for a proportionate approach, when developing the sustainability criteria for solid biomass, with a view to be at the same time effective and practical.
- Numerous initiatives about biomass sustainability are ongoing. The European approach should secure consistency with them, e.g. ISO.

## **Note to the Editor**

### **CEPI aisbl - The Confederation of European Paper Industries**

The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit making organisation regrouping the European pulp and paper industry and championing this industry’s achievements and the benefits of its products. Its mission is to promote the member’s business sector by taking specific actions notably, by monitoring and analysing activities and initiatives in the areas of industry, environment, energy, forestry, recycling, fiscal policies and competitiveness in general. Through CEPI, the paper industry increases its visibility and acts on emerging issues, making expert and constructive contributions on behalf of the industry.

Its collective expertise provides a unique source of information both for and on the industry; coordinating essential exchanges of experience and knowledge among its members, the ability to provide technical assistance to legislators and to identify independent experts on specific issues.

---

<sup>3</sup> Bio-energy and the European Pulp and Paper Industry – An Impact Assessment, MCKINSEY & COMPANY, INC. AND PÖYRY FOREST INDUSTRY CONSULTING FOR CEPI, July 2007



Through its 18 member countries (16 European Union members plus Norway and Switzerland) CEPI represents some 800 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 1200 paper mills. Together they represent 27% of world production.