

PositionPaper

FOR-164-09final

26 February 2010

Biomass sustainability criteria should be binding and harmonized!

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 systems¹.

In 2008, on top of the industry's strong commitment to only source legal wood², 56 % 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. The European Paper Industry is also the biggest single user and producer of bio-energy in Europe, since its biomass based energy consumption corresponds to more than a quarter of the total solid biomass based energy used in Europe.

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.

Concerning the feedstocks used to reach those targets, it has to be stressed that sustainability criteria cannot undistinctly and equally apply to all kind of feedstocks. Sustainability criteria that are relevant for certain types of forests and sources of feedstocks 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. Further key principles of the content of biomass sustainability requirements are laid down in CEPI's position paper from September 2009.

With respect to the report on requirements for a sustainability scheme for solid biomass, which has been published 25 February 2010, the European Pulp and Paper Industry is of the opinion that it does not go far enough. Biomass sustainability criteria should be binding and harmonized at European level.

Compared with individual approaches by the Member States, a harmonised European scheme is a more effective way

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

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



- to ensure the efficient functioning of the internal market for biomass. It should therefore be avoided that biomass is transported to areas where the support mechanisms are the highest and sustainability criteria are the weakest;
- to secure a level playing field among the various sectors using the same raw material for products, with the objective to ensure cascading material use (priority to high value goods, that can be recycled and, at the end of life, used for energy production). Forest products already have to comply with sustainability criteria through Green Public Procurement policies today;
- to avoid perverse incentives to use wood in a manner that is less demanding from sustainability performance and efficiencies (both energy and raw material efficiencies) perspective;
- to avoid loopholes such as exemptions for small installations or small raw material suppliers. A significant share of district heating plants will have capacities inferior to 1 MW. An exemption for less than 1MW installations (district heating, households) would create an exemption for their feedstocks suppliers to comply to the sustainability requirements, even if they are large scale operators.
- to ensure that imported biomass will originate from sustainable sources. It is clear that several member states will rely on imports, including from non-EU countries, to achieve their renewable energy targets. Imported feedstocks or energy should match the level of sustainability of domestically sourced ones;
- to confirm the status of black liquor as solid biomass: the pulp and paper industry's biomass based primary energy consumption corresponds to more than a quarter of the total solid biomass based energy used in Europe.
- to ensure that taxpayers' money, through its use for subsidies in the bioenergy sector, does not contribute to unsustainable practices in the forest.

In conclusion, CEPI urges the European Commission to quickly consider a legislative proposal for harmonized and binding sustainability criteria at European level.

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.



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.