

# Forest Watch Special Report

## Biomass Report shows increasing lack of policy coherence on forest protection

By Veerle Dossche

On 1 March 2010, the European Commission launched a Green Paper on forest protection<sup>1</sup> to initiate a public debate about how to address the impact of climate change on forests in the EU, with Connie Hedegaard, the new EU Commissioner for Climate Action stating, “I very much welcome the timely launch of the debate”.<sup>2</sup> NGOs were at a loss as to how to interpret such a statement, given that only days before the European Commission had adopted a biomass report<sup>3</sup> that is very likely to have a negative impact on the forests in Europe and globally.

The biomass report is part of the Commission’s follow up to the 2009 Renewable Energy Directive,<sup>4</sup> which requested that the European Commission report on a biomass sustainability scheme for energy uses of biomass, other than biofuels and bioliquids (i.e., for electricity, heating and cooling) by the end of December 2009. The directive currently contains only criteria (but binding) for biofuels and bioliquids, with the aim of ensuring the sustainability of biofuels - a concept that was heavily criticised by NGOs.<sup>5</sup>

In mid 2009, the Commission considered presenting a legally binding standard for biomass, as was earlier supported by a large majority of submissions to a public consultation that organised by this institution on biomass criteria. The Commission report, finally launched in February 2010, proposed neither binding criteria nor any other proposal on how to ensure sustainability of biomass production for energy purposes, containing instead only recommendations for Member States that wished to introduce biomass criteria at the national level.

Having a binding target for renewable energy in place but no binding sustainability criteria for biomass threatens to encourage the cheapest and often most destructive forms of biomass production. Moreover, the report recommends that Member States use the biofuels criteria as a basis for biomass (subject to some amendments). The EU’s biofuels sustainability scheme is not only too weak, it is also not suited for biomass as, for example, the greenhouse gas performance levels should be much more ambitious, there are no criteria guaranteeing good forestry practises and it does not address emissions associated with forestry or logging activities.

While biomass should be included in the future energy mix, it can be considered a “renewable” energy source only under certain conditions – yet all of these conditions have been completely disregarded in the Commission’s biomass report. The Commission’s message – and indeed its intentions – is therefore unclear. Commissioner Janez Potočnik states that “the stakes [for forest protection] are high” while the biomass report launched just days earlier will undermine forest protection and threatens the EU’s policies on fighting deforestation and halting the loss of biodiversity.

Despite these concerns, political support for the Green Paper is important because responses to it will guide the Commission’s view on whether additional action for forest protection is needed at EU level. At the same time, however, action cannot wait until the end of 2011 - the date proposed in the biomass report by which the Commission must consider whether additional measures are needed to address sustainability issues related to biomass use - to correct the likely damage caused by the EU’s biomass policy. The Commission has failed to come up with binding criteria for biomass used for energy production. Member States’ commitment to set up a participative process to develop biomass criteria at national level that will contribute to reducing greenhouse gas emissions and not lead to environmental and social negative impacts will now become the test that will show where the EU’s priorities lie – in forest protection or meeting biomass energy targets irrespective of the environmental and social costs.

### Biomass Report, Green Paper and other examples of policy incoherence

One of the recommendations of the midterm report of the EU’s Biodiversity Action Plan<sup>6</sup> is that “there is a need to further strengthen the mechanisms for cooperation within and between the Community and Member States in implementing this Action Plan, especially with regards to policy sectors affecting biodiversity.” Although at the EU and national levels many policies shaping forest use and management exist, coherence among different plans is usually lacking. The biomass report compounds this lack of coherence.



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The biomass report refers to the Renewable Energy Roadmap of 2006,<sup>7</sup> which indicated that biomass use can be expected to more than double by 2020. The Commission argues that most biomass comes from European forest residues and by-products of other industries (processing industries), and that, as forest management governance structures in the EU are strong, the sustainability risks are low. All this is not very reassuring to those who have been following the issue. Some EU countries already import considerable quantities of biomass; strong forest governance structures do not necessarily guarantee a better conservation of forests; and the negative impacts of increased removal of forest residues and stumps on the soil organic matter and the soil carbon stocks are largely ignored. Moreover, the absence of any binding rules gives Member States carte blanche to import unlimited amounts of biomass from third countries without asking questions as regards sustainability of the production systems and their social impacts, adding another driver to already rampant deforestation.

Yet, the recently launched Green Paper warns of the impact climate change will have on forests. The paper states that the need to protect the carbon storage capacity of forests is great and increased use of biomass could lead to an intensification of forestry practises and a reduction of the forest carbon stocks as a result. This warning is based on no uncertain sources: "Projections made by the UN-ECE and FAO suggest a possible imbalance between supply and demand to meet existing material use and extrapolated renewable energy needs, if the importance of wood in the biomass component of the total renewable energy supply remains constant."<sup>8</sup>

The Commission's biomass report also mentions issues such as loss of terrestrial carbon that can result from harvesting practices, and refers to ongoing international climate change negotiations to decide on accounting methods for land use, land use change and forestry (LULUCF). In this context, it states that proper accounting can make an important contribution in the context of sustainable production of biomass. However, carbon accounting as part of LULUCF is not working, and the ongoing negotiations, focussing on small improvements to the rules, will not change the fundamental flaws in the system.

## It's lack of information systems, stupid

One of the crucial topics addressed by the Green Paper is the tools and systems needed to assess information about forest resources and condition. The need for more harmonised, reliable and comprehensive information on forests is increasingly recognised by the Commission, the Member States and the economic operators, according to the Green Paper. Yet this urgency is lacking in the Commission's biomass report. Information systems should be one of the backbones of the biomass policy. There are gaps in the EU's knowledge about the availability of biomass resources and the impact that extraction of biomass will have on the total carbon storage of forest ecosystems.

The impact assessment from the biomass report states that "[t]he core indicator for meeting the objectives is the increasing use of biomass without leading to deforestation and other negative environmental impacts. Reporting and monitoring systems are available through Eurostat at EU level, but will need to be strengthened, including at national level, for more accurate results." Although the biomass report itself recognises that national and European statistics have large knowledge gaps concerning the amount of biomass used for energy purposes, it goes no further than "recommendations" to Member States to keep records of the origin of biomass used for energy production. The gaps do not seem to worry the Commission as otherwise it would have used the biomass report to adopt a precautionary approach, ensuring the current policy will contribute truly to reducing emissions and be based on solid information.

## How to proceed after this false start

The Commission has fallen short of outlining meaningful measures to ensure the EU biomass policy will not harm biodiversity. It is therefore now incumbent on Member States to demonstrate their own policy coherence. The most supportive next step would be for Member States to set up a participative process to develop biomass criteria that will help reduce greenhouse gas emissions without leading to environmental and social negative impacts.

In 2010, the protection of forests needs to be high on the political agenda. There should be a serious analysis of why protection of forests failed so as to come up with the right measures to improve the situation. 2011 as the international year of the forest will provide a good opportunity to assess how serious the EU is in ensuring coherent policy that will protect forests and increase their resilience to climate change.

### END NOTES

1. Green paper on forest protection and information in the EU: preparing forests for climate change. COM(2010)66 Final
2. Press release European Commission "European Commission launches public debate on protecting Europe's forests against climate changes". IP/10/207, 1 March 2010
3. Report on sustainability requirements for the use of solid and gaseous biomass sources in electricity, heating and cooling. COM(2010)11
4. Directive 2009/28/EC on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC.
5. See NGO report "Biofuels, handle with care". <http://www.transportenvironment.org/Pages/Low-Carbon-Fuels/>
6. Communication on the mid-term assessment of implementing the EC Biodiversity Action Plan COM(2008)864
7. Communication on the Renewable Energy Road Map. Renewable energies in the 21st century: building a more sustainable future. COM(2006)848
8. [www.unece.org/timber/docs/dp/dp-41.pdf](http://www.unece.org/timber/docs/dp/dp-41.pdf)