



Mr Karl Falkenberg
Director General
DG Environment
European Commission
1049 Brussels

Brussels, 7 December 2009

Re: The need for binding biomass sustainability criteria

Dear Mr Falkenberg,

We are alarmed by the apparent change in the position of the European Commission to not consider *legally binding* sustainability criteria for the production of biomass. We have been informed that the European Commission will now propose *voluntary* standards and therefore urge DG Environment not to sign off on any Commission report that does not propose legally binding criteria.

The need for binding sustainability criteria for biomass used in heat and electricity production came out clearly in the public consultation in July – September 2008, with a large majority of stakeholders advocating for legally binding criteria.

By adopting legally binding sustainability criteria for biofuels and bioliquids, and not requesting legally binding criteria for solid biomass, the European Commission will create perverse incentives as well as unfair competition between different biomass sources. For example woody biomass used for the production of second generation biofuels needs to comply with legally binding sustainability criteria, whereas woody biomass used for co-firing in power plants to produce heat and electricity does not need to fulfil sustainability criteria.

Furthermore, as already shown in studies, the projected EU demand for bio-energy cannot sustainably be met by a European supply, meaning that imports are expected to increase. By not limiting the use or imports of unsustainably produced timber for energy, the EU undermines its own position to halt global forest loss and reduce tropical deforestation as expressed in the EU Communication ‘Addressing the Challenges of Deforestation and Forest Degradation to Tackle Climate Change and Biodiversity’ of October 2008. Mandatory criteria are therefore essential to ensure only sustainably produced timber will be used.

Last, reducing greenhouse gas emissions by increasing biomass use for heat and energy production will only work if all emissions are taken into account, including those related to forest management. If not, increased biomass use may lead to more, not less emissions from energy production. The need for mandatory criteria specifying greenhouse gas reductions, are therefore required.

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We urge you to ensure DG Environment does not sign off on any Commission report that proposes voluntary standards. We further ask you to set up an inclusive and participative process to develop a set of viable sensible sustainability criteria for biomass. We look forward to your reply.

Yours sincerely

Saskia Ozinga, Campaign coordinator, FERN

Risto Sulkava, President of the Board, Suomen luonnonsuojeluliitto (Finnish Association for Nature Conservation)

Stuart Wilson, Director, Forests Monitor

Andrew St Ledger, The Woodland League

Magda Stoczkiewicz, Director Friends of the Earth Europe

CC: Mr Stravos Dimas, Commissioner for Environment