



Confédération Européenne des Propriétaires Forestiers
Confederation of European Forest Owners
Zentralverband der Europäischen Waldbesitzer

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Position paper

ILUC: The role of wood must be secured in tomorrow's energy mix

On 17 October 2012 the European Commission published a Directive proposal *amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources*. The proposal aims to limit the contribution that conventional biofuels (with a risk of indirect land use change (ILUC) emissions) make towards attainment of the targets in the Renewable Energy Directive and improving the greenhouse gas performance of different biofuel production processes.

The Confederation of European Forest Owners (CEPF) welcomes the overarching idea and steps taken in the Commission's (ILUC) proposal to move towards advanced second-generation biofuels. Forests in Europe provide a tremendous domestic potential and sustainable raw material, which does neither compete with food production nor cause indirect land use change.

The potential of forest-based biomass should be acknowledged and promoted when moving towards meeting the targets set for the future biofuels. Unfortunately the proposals made by the European Parliament (EP) rapporteur Corinne Lepage would lead exactly to the reverse. By questioning the sustainability of forestry and requiring sustainability verification for forest-based biomass, the EP proposal would in practice exclude forest-based raw materials from biofuel production for many years. Meaning the achievement of the EU 2020 target for biofuels, and in particular the further development of second-generation biofuels, would be seriously put on risk.

To secure sustainability, EU Member States have proper instruments and regulations in place at sub-national and national levels, which safeguard the principles of sustainable forest management (SFM), i.e. forest laws and other complementary regulations such as nature or forest-protection regulations, public procurement regulations, or land-use and related planning acts. Furthermore, the scope of national forest laws has expanded over the last decades, covering now the multiple social, economic and ecological aspects of SFM. In addition there are also market-based tools – such as forest certification to give additional assurance for SFM in practice.

At EU level, there are several well-established instruments in place, that support and guarantee sustainable land use and forest management and regulate timber markets, such as the EU Forest Strategy, Natura 2000 or the EU Timber Regulation. Furthermore, the RES Directive already defines sustainability requirements for biofuels in article 17.

CEPF wishes to underline that according to the latest Eurostat statistical report on forests¹, forests in Europe have been growing both in area and volume during the past 60 years, and currently only 60% of the

¹ Forestry in the EU and the world - A statistical portrait. Eurostat 2011.

http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-31-11-137/EN/KS-31-11-137-EN.PDF



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annual increment is harvested (EP Am.10, 22, 50). This positive situation has been reached by large investments made towards SFM implementation and an active use of wood in several industry sectors and countries all over Europe.

CEPF shares the Commission's view that indirect land use change (ILUC) is an issue that needs to be addressed. However, in case Lepage's proposals get adopted much more pressure will be put on food based feedstock. Therefore, CEPF supports the Commission's view of promoting the use of developed second-generation biofuel stocks by using different multiple accounting factors on their energy content. As sustainably managed forests in Europe produce large amounts of ligno-cellulosic material, which has no or very low estimated ILUC effects, this material should naturally be provided with a multiplying factor. For this reason CEPF strongly supports the double accounting of the energy content of ligno-cellulosic material and fourfold accounting of forest and wood working residues (EP Am. 23, 76, 77), as originally proposed by the Commission.

The European forest owners wish to remind that wood material used for liquid biofuel production is only one product of SFM operations carried out during the long forest life cycle (50-150 years). Furthermore, it needs to be underlined that biomass already plays an important role in many countries energy mix (EP Am. 23, 51). As the material removed from forests to biofuel production is mainly low quality wood, it does not normally compete with the material produced for the wood working industry. On the contrary, the extraction of forest biomass helps to grow good quality wood and has a positive effect on the condition and health of forests (EP Am. 22, 50). For example, in the Mediterranean/Southern region the risk of forest fires gets significantly reduced through increased forest management and regular thinning operations and a sustainable mobilisation of low quality timber (to e.g. local industry) that otherwise would accumulate in the forests.

In many countries in Europe the cutting levels could be still increased as the forests are growing and the annual fellings are far below the annual increment. This counts in particular for small diameter and/or low quality wood, as the markets traditionally for these kinds of assortments in some parts of Europe do not exist. Excluding or not further mobilising the potential of ligno-cellulosic material within the limits of SFM, as Ms Lepage proposes by removing the double accounting from small diameter wood, would be against the original idea of the Commission's ILUC proposal.

To conclude, and support the Commission's view: Wood as a domestic, renewable, climate friendly and energy efficient material for biofuel production can and should not be ruled out from Europe's energy mix.

For further information, please contact:

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