



JOINT STATEMENT

ON THE DRAFT EUROPEAN STANDARD FOR BIO-BASED PRODUCTS – SUSTAINABILITY CRITERIA

CEPEF, Copa-Cogeca, ELO, Eustafor and USSE share certain concerns about the draft European standard on bio-based products – sustainability criteria (document prEN 16751), drawn up by the Technical Committee CEN/TC 411 and submitted to national standards bodies for comments.

The proposed draft standard goes far beyond the mandate (M/492) issued by Directorate-General for Enterprise and Industry to CEN, CENELEC and ETSI to develop the specific standardisation system as outlined in the communication “A Lead Market Initiative for Europe” (COM (2007) 860 final) and exceeds the competencies of the institutions that developed it. Primary biomass production does not fall within the scope of this mandate as this provides a detailed definition of bio-based products¹, clearly stating that “the concept excludes traditional bio-based products, such as pulp and paper, and wood products, and biomass as an energy source.”

In light of the above, it is obvious that biomass production itself is not covered in the scope of the mandate, thus primary producers should not be considered within the category of economic operators to whom this standard is addressed. In our understanding the aim of this standard was not to tackle primary biomass production, but only bio-based products that are processed by the industry.

We therefore disagree with point 4.1 of the draft standard, which states that “all criteria in this European standard shall be addressed for the biomass production.” Sustainability of biomass production in both EU forest and agriculture sectors is already guaranteed by advanced and specific principles, multiple and broad ranged standards and instruments as developed, implemented and constantly updated under the framework of sustainable forest management (SFM) and cross-compliance for agriculture.

European forests have been managed in compliance with SFM, which was defined and politically adopted as the key concept by the Ministerial Conference on the Protection of Forests in Europe (MCPFE) in 1993 and subsequently enacted in all forest-related legislation and policies of EU Member States. To monitor and report regularly on SFM at national level, a sophisticated set of pan-European criteria and indicators have been developed and are widely implemented. Furthermore, there are also market-based tools - such as forest certification - giving additional assurance of SFM in practice.

¹ “non-food products derived from biomass (plants, algae, crops, trees, marine organisms and biological waste from households, animals and food production). Bio-based products may range from high-value added fine chemicals such as pharmaceuticals, cosmetics, food additives, etc., to high volume materials such as general bio-polymers or chemical feed stocks. The concept excludes traditional bio-based products, such as pulp and paper, and wood products, and bio-mass as an energy source.”

Consequently, the new EU Forest Strategy and related on-going discussions on SFM criteria for all uses of biomass in the EU, refer to the same concept, definition and instruments as developed by the Member States at national level and Forest Europe at pan-European level. At the same time, it is crucial to respect the principle of subsidiarity, as for instance highlighted in the Commission's communication on "A Lead Market Initiative for Europe".

In EU-28 sustainable production in agriculture is guaranteed by cross-compliance and many national laws (e.g. agricultural acts, environmental protection laws). They serve to protect natural resources (water, air, soil) and biodiversity by setting high environmental standards for all agricultural activities, regardless of whether they are food or non-food use. Cross-compliance is the key tool to ensure sustainable agriculture production, therefore it would be unacceptable if farmers were subject to specific requirements when producing biomass to be used for bio-based products within the framework of the CEN standards.

Yet the draft standard ignores all of the aforementioned processes and mechanisms. We therefore strongly oppose the draft standard and the proposed sustainability criteria for the supply and specific end-use of biomass, which runs counter to the mandate granted to the Technical Committee CEN/TC 411. This also ignores the European Commission's recent decision not to develop sustainability criteria for specific uses of biomass such as solid biomass for energy production.

Additional sustainability criteria for biomass production for operators, as proposed in the current draft standard, will be neither consistent with existing policies nor cost-efficient in fostering the emergence of bio-based markets with a high economic and social value. On the contrary, it will increase the administrative burden.

We also believe that the current process to establish this CEN standard lacks transparency and proper communication with relevant stakeholders, as the current draft addresses primary biomass production and producers in contradiction with the initial mandate provided by the Commission to CEN.

As outlined and requested by the mandate, this process and CEN must take into account the different relevant on-going processes and existing mechanisms of the forest and agriculture sector and co-ordinate its activities with the initiatives already taken by relevant actors at national and European level. Considering this, we recommend to consult all sector-relevant associations as well as the relevant Civil Dialogue Groups of the European Commission when developing such standards.

We urge the Commission and the Technical Committee to grant the full consideration to concerns raised in this letter.

CEPF, Copa-Cogeca, ELO, Eustafor and USSE are committed to support resource-efficiency and competitive forest and agriculture sectors for smart, sustainable and inclusive bioeconomy in Europe, provided that coherent policies are in place.

CEPF - Confederation of European Forest Owner

COPA COGECA - European Farmers European Agri-Cooperatives

ELO - European Landowners' Organization

EUSTAFOR - European State Forest Association

USSE - Union des sylviculteurs du Sud de l'Europe