



Mr Günther Oettinger
European Commissioner for Energy
European Commission Directorate-General for Energy
B - 1049 Brussels

CC.:

Mr Philip Lowe
Mr Michael Hager
Mr Joachim Balke
Mr Hans van Steen

Brussels, 5 September 2013

Ref.: Sustainability criteria for solid and gaseous biomass

Dear Commissioner,

CEPF, Copa-Cogeca, ELO, EUSTAFOR and USSE strongly oppose the draft text on sustainability criteria for solid and gaseous biomass currently in inter-service consultation in the Commission. Trees are not grown for one single purpose. Applying specific sustainability criteria for a single product – considering the wide spectrum of products and functions forestry provides – is simply not feasible and completely distorts the principle of sustainable provision of biomass as such. Furthermore, we are convinced that such a proposal would not be effective, cost efficient and consistent with existing policies as required by the Commission report on biomass sustainability requirements in 2010.

We are concerned that the draft text exceeds the boundaries of the EU's competence in forestry. The Commission has no mandate to set up the rules that restrict and intervene in well-established and accepted sustainable forest management practices in the Member States. Instead, the Commission should take into account already existing instruments that deliver sufficient proof of sustainability of biomass from forests at a regional/national scale. Moreover, the Commission should not overstep its competence by establishing operational requirements, technical criteria, etc. at the holding level by means of implementing acts. This is not in accordance with the principle of subsidiarity.

CEPF, Copa-Cogeca, ELO, EUSTAFOR and USSE do not find it acceptable for the Commission to have a right of veto to restrict or exclude certain feedstock, e.g. roundwood, for electricity and heating/cooling production. We note that wood stock in the EU's forests is constantly growing, as cuttings are far below increment rates (62 %) and significant immobilised timber resources exist. Finally, the intended proposal must not rule out biomass obtained during the conversion of land as unsustainable. This new approach, compared to the original wording in the RES-Directive, would mean that biomass harvested due to construction of roads, power lines, industrial facilities etc. would automatically be considered as unsustainable.

Therefore, we urge the Commission to withdraw this proposal as it would severely burden the entire sector and hinder the EU on its way to meeting its renewable energy targets by 2020.

Yours faithfully,



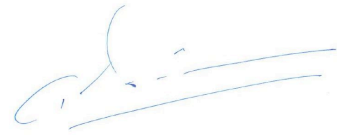
Hubert De Schorlemer
President of CEPF



Gerd Sonnleitner
President of Copa



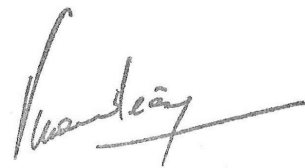
Christian Pèes
President of Cogeca



Christoph Büren
President of ELO



Georg Erlacher
President of EUSTAFOR



Christian Pinaudeau
Secretary General of USSE

CEPF – Confederation of European Forest Owners
Copa-Cogeca – European Farmers and European Agri-Cooperatives
ELO – European Landowners Organisation
EUSTAFOR – European State Forest Association
USSE – Union of Foresters of Southern Europe