

Public Consultation DG TREN:

Biofuel Issues in the new legislation on the promotion of renewable energy

Comments by the Confederation of European Paper Industries (CEPI) on how a biofuel sustainability system should be designed

- 1. How should a biofuel sustainability system be designed? (see CEPI comments below)**
2. How should overall effects on land use be monitored? (no comments)
3. How should the use of second-generation biofuels be encouraged? (no comments)
4. What further action is needed to make it possible to achieve a 10% biofuel share? (no comments)

Question 1:

The Confederation of European Paper Industries (CEPI) welcomes the intention of the European Commission to introduce sustainability criteria for biofuels, as sustainability is the only means to ensure that renewable energy is really “green”.

Sustainability of biofuels starts with the sustainability of its feedstocks. It has therefore to be ensured that the feedstocks for biofuels come from legal and sustainable sources as it is already the case for the feedstocks being used as raw material for the forest-based industries. The forest sector is promoting Sustainable Forest Management and its Certification by third party verification such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). In Europe, half of the wood used by the Pulp and Paper Industry is coming from certified sources.

The Ministerial Conference on the Protection of Forests in Europe has developed Pan-European Criteria and Indicators (C&I) for monitoring, assessing and reporting progress on Sustainable Forest Management. These C&I should be equally used regardless if the biomass is used as biofuel or as raw material for the Forest Based Industry. This would be the basis for sustainable production of biofuels and ensure a level playing field between biomass and raw materials.

Currently Member States are integrating criteria for sustainability in their Public Procurement Policies for wood and paper products. These should be equally applied for green energy from Biomass to ensure a level playing field between the different uses of raw material.