Background:

On 10th January 2007 the European Commission made proposals for a new Energy Policy for Europe. These included a renewable energy roadmap proposing:

- a binding 20% target for the overall share of renewable energy in 2020 – the effort to be shared in an appropriate way between Member States;
- a binding 10% target for the share of biofuels in petrol and diesel in each Member State in 2020, to be accompanied by the introduction of a sustainability scheme for biofuels.

The Commission is now drafting proposals to incorporate these targets in legislation. In doing so, the Commission will take into account the views of stakeholders as expressed in last year's consultation exercises on heating and cooling and biofuels and the recent consultation exercise on administrative obstacles to the increased use of renewable energy in electricity generation.

The consultation document sent by the Commission complements those exercises. The Commission would like to know the views of public authorities, businesses, non-governmental organisations and other interested parties on the following questions:

1) How should a biofuel sustainability system be designed?
2) How should overall effects on land use be monitored?
3) How should the use of second-generation biofuels be encouraged?
4) What further action is needed to make it possible to achieve a 10% biofuel share?

The rest of the Commission document explains the questions in more detail.

General opinion:

Flanders very much welcomes the initiative of the Commission. This initiative addresses most of the priority actions preferred by Belgium, as proposed by Belgium to the Commission in the Belgian comments on the European Biomass Action Plan:

Preferential actions for Europe according to Belgium:

1. Implementation of a European certificating system guaranteeing that biomass is being produced in a sustainable way.
2. Preferential implementation of the biofuels' standardisation fuels, including solid biomass streams and biomass waste.
3. Measures intending to increase the supply of biomass, such as maximal support of energy cultures and promotion of the working of a biomass market.
4. Support the research and development regarding second generation biofuels.
5. Considered from the environmental viewpoint attention is required for the possible impact on for instance biodiversity, air and waste policies. Wherever possible it is indicated to create double surplus values simultaneously in various areas.

Views on specific questions:

1) How should a biofuel sustainability system be designed?

This consultation apparently focuses on biofuel for transport. However, the 20% renewable energy target by 2020 will also imply the large scale use of biomass for electricity and heat production or cooling. These large scale biomass uses can have the same negative effects as the use for biofuels. The sustainability system should therefore offer the possibility to be expanded to other biomass uses than transport. Ideally there should even be a system related to uses of biomass other than energy.

Any sustainability system should avoid double counting of sustainable biomass, whether the verification is based on “track and trace”, “book and claim” or “mass balance” systems (each of which systems could have benefits, depending on the biomass type). Therefore, an international accounting or communication system is needed. This international accounting system can not be installed by individual member states. We would therefore welcome the Commission to take the initiative to organise this accounting. Member states could voluntarily participate in this framework.

The administrative burden of the sustainable system should be differentiated depending on the scale of the biomass production or trade. The administrative burden should be limited for small scale producers and traders.

To avoid a proliferation of national sustainability systems and verification processes, the Commission should carefully investigate the existing national schemes to measure greenhouse gas impacts and land use effects, and indicate which schemes could be accredited for EU use (including the existing EU agricultural sustainability systems). In this way the accredited systems can be adopted by other member states and develop into an EU standard.

The greenhouse gas balance, biodiversity and carbon stock impacts of land use change can be accepted as the priority sustainability criteria to be implemented. Concerning the greenhouse gas balance, national schemes under development seem to be more ambitious than just a positive balance (e.g. more than 50-70% greenhouse gas reduction for electricity production, more than 30% reduction for biofuel). We would like the Commission to investigate what is possible using the best available technology. Additionally, the quality of soil, air and water should be maintained and added as a sustainability criterion. (e.g. use of fertilizers, pesticides, herbicides).

Carbon stock difference between land uses could be taken into account for the greenhouse gas balance, on the condition that these effects are sufficiently known and can be implemented in an easy and clear way (e.g. default values available).

As to biodiversity, the possibility should be considered to allow the compensation of any adverse impacts through the creation and maintenance of strictly protected areas in which exploitation and culture are not allowed.

After more experience is gathered, the system should be expanded to criteria concerning the overall effects on food supply, local economy and employment conditions.

In order to avoid a mere shift of the export of non-sustainable biomass to other areas of the world, it is very important to develop a truly international standard and mechanism and to stimulate the worldwide use of it. In that respect it is important for positive as well as negative incentives to comply with the applicable WTO rules. The EC should investigate the legal aspects related to this matter in order to prepare related international negotiations.

2) How should overall effects on land use be monitored?

The possible way forward described by the Commission seems feasible. A central accounting system for trading sustainable biomass, as mentioned above, could also provide the necessary input for monitoring the overall effects on land use.

3) How should the use of second-generation biofuels be encouraged?

We welcome a stronger support for second generation biofuels. However, they should also achieve a defined level of greenhouse gas savings to benefit from additional advantages.

4) What further action is needed to make it possible to achieve a 10% biofuel share?

The greenhouse gas emissions from transport are very important in Flanders (and Belgium), since the very dense traffic and transit. A very large part of the fuel use consists of diesel.

To be able to reach the 10% biofuel target, the EU legislation should include measures to ensure that diesel containing 10% biodiesel (by volume) can be placed on the market, and is in fact placed on the market. The EU legislation should also include measures to encourage the use of ethanol and biodiesel in high blends, and the use of pure vegetable oil. These measures should encourage car manufacturers to design vehicles that can use (high blend) biofuels, and make them commercially available in large numbers.

A regular review by the Commission, suggesting additional measures when the proposed scenario is not followed, is necessary to meet the 2020 biofuel targets. Since Flanders (and Belgium) are small regions, with a large amount of transit traffic, harmonised measures (such as obligatory biofuel targets and taxation) are necessary to meet the EU goals defined for Belgium.