

4. Questions

4.1 General

As the Commission does not have a specific energy policy on peat the commission has not yet fully recognized the potential to use this fuel in a climate and energy benign way. We will therefore in the following emphasise that countries that think peat is sustainable should have a greater responsibility to handle this local fuel from an energy and climate efficient way. We need well balanced and transparent instruments for industry to reduce GHG emission from peat production and use.

4.2 Targets

We think that it is an advantage if we have an overall climate target that create incentives for peat industry to improve the efficiency in peat production and use. With a climate goal energy peat has an important role to achieve both energy and climate goal. Simultaneously we should add a renewable goal to the climate goal as a complement because peat also is important to make cofuelling with woodfuel more efficient and climate benign. The good effects in cofuelling with woodfuel in CHP was an important reason for EU commission to accept peat in the Swedish system of green certificate 2003 (State aid nr N 294/2003-Sweden).

4.3 Instruments

We support the Green paper (page 9) that the 2030 policy framework should strike a balance between concrete implementing measures at EU level and Member States flexibility to meet targets in ways which are most appropriate to national circumstances. An example of a problem we face in Sweden is that peat is in a unfavorable situation due to the fact that peat has a higher emission factor than coal and oil. The signal is that coal and oil should be prioritized before peat. This create a conflict between incompatible goals in EUs and Swedens climate and energy policy. This conflict should in line with our opinion be treated in the national energy policy based on local conditions solved in connection with the creating of a local energy mix under the framework of an overall climate goal for the union.

In this context we will refer to IPCC which in its meeting in Mauritius 2006 accepted peat as a separate fuel category and stated that specification of peats is a country specific or even a site specific (Tier 3) approach.

A Peat Forum was organized in Brussels by EPAGMA (European Peat and Growing Media Association) in May 2013 with representatives from the parliament, the commission and the Lithuanian delegation in Brussels. A study about peat from a life cycle perspective was presented in the Forum with the following conclusions:

- By choosing high emitting peatlands for production and harvest the peat in the most efficient way the climate impact from energy peat can be significantly decreased.
- A life cycle perspective is needed when looking at the climate impact of energy peat.
- Most important factors for the climate impact are initial peatland type, after use strategy and energy peat production technology.
- To fully account for the climate impact of energy peat the time perspective is of major importance.

(Comparative review of variation in LCA results and peatland emissions from energy peat utilisation, Höglund et al IVL Swedish Environment Research Institute Ltd. 2013).

We think that it is suitable to treat peat on a national level taking into consideration that the situation differs between countries about climate impact and other conditions. This is also in line with the subsidiarity principle in the EU treaty (5.2). According to our opinion we think that peat as IPCC stated should be treated from a life cycle perspective as biofuels when determining the emission factor.

We believe that research and innovation is of great importance to create a climate effective and sustainable energy system. There is a great potential to minimize the climate impact through research, development and innovation. This could be done with producing peat from high emitting peat bogs in line with a national climate strategy linked to LULUCF. The climate efficiency linked to an overall climate strategy can be maximized with efficient production, use of peat together with woodfuels in CHP and the development of methods to create carbon sinks of peatlands that before peat production have been a source for CO₂. It could be done through afforestation or creating of wetlands of importance for biodiversity. We think that peat production and restoration should be observed as a possibility for land strategies within the LULUCF.

4.4 Competitiveness and security of supply

An increased use of peat together with wood fuels can lead to a more efficient use of biofuels in a resource and climate effective way. A supply of more fuels on the market can also lead to an increased competition in the energy system and create economic growth. We think that the handling of peat in a national level can create a more adapted peat use which create jobs, growth and competitiveness.

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Swedish Peat is an organization for Swedish peat producers and users. It works with energy and horticultural peat. It has around 35 members.