

A sustainable bioenergy policy for the period after 2020

Fields marked with * are mandatory.

Introduction

EU Member States have agreed on a new policy framework for climate and energy, including EU-wide targets for the period between 2020 and 2030. The targets include reducing the Union's greenhouse gas (GHG) emissions by 40 % relative to emissions in 2005 and ensuring that at least 27 % of the EU's energy comes from renewable sources. They should help to make the EU's energy system more competitive, secure and sustainable, and help it meet its long-term (2050) GHG reductions target.

In January 2014, in its Communication on A policy framework for climate and energy in the period from 2020 to 2030,[1] the Commission stated that '[a]n improved biomass policy will also be necessary to maximise the resource-efficient use of biomass in order to deliver robust and verifiable greenhouse gas savings and to allow for fair competition between the various uses of biomass resources in the construction sector, paper and pulp industries and biochemical and energy production. This should also encompass the sustainable use of land, the sustainable management of forests in line with the EU's forest strategy and address indirect land-use effects as with biofuels'.

In 2015, in its Energy Union strategy,[2] the Commission announced that it would come forward with an updated bioenergy sustainability policy, as part of a renewable energy package for the period after 2020.

Bioenergy is the form of renewable energy used most in the EU and it is expected to continue to make up a significant part of the overall energy mix in the future. On the other hand, concerns have been raised about the sustainability impacts and competition for resources stemming from the increasing reliance on bioenergy production and use.

Currently, the Renewable Energy Directive[3] and the Fuel Quality Directive[4] provide an EU-level sustainability framework for biofuels[5] and bioliquids.[6] This includes harmonised sustainability criteria for biofuels and provisions aimed at limiting indirect land-use change,[7] which were introduced in 2015.[8]

In 2010, the Commission issued a Recommendation[9] that included non-binding sustainability criteria for solid and gaseous biomass used for electricity, heating and cooling (applicable to installations with a capacity of over 1 MW). Sustainability schemes have also been developed in a number of Member States.

The Commission is now reviewing the sustainability of all bioenergy sources and final uses for the period after 2020. Identified sustainability risks under examination include lifecycle greenhouse gas emissions from bioenergy production and use; impacts on the carbon stock of forests and other ecosystems; impacts on biodiversity, soil and water, and emissions to the air; indirect land use change impacts; as well as impacts on the competition for the use of biomass between different sectors (energy, industrial uses, food). The Commission has carried out a number of studies to examine these issues more in detail.

The development of bioenergy also needs to be seen in the wider context of a number of priorities for the Energy Union, including the ambition for the Union to become the world leader in renewable energy, to lead the fight against global warming, to ensure security of supply and integrated and efficient energy markets, as well as broader EU objectives such as reinforcing Europe's industrial base, stimulating research and innovation and promoting competitiveness and job creation, including in rural areas. The Commission also stated in its 2015 Communication on the circular economy^[10] that it will 'promote synergies with the circular economy when examining the sustainability of bioenergy under the Energy Union'. Finally, the EU and its Member States have committed themselves to meeting the 2030 Sustainable Development Goals.

[1] COM(2014) 15.

[2] COM/2015/080 final.

[3] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC (OJ L 140, 5.6.2009, p. 16).

[4] Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

[5] Used for transport.

[6] Used for electricity, heating and cooling.

[7] Biomass production can take place on land that was previously used for other forms of agricultural production, such as growing food or feed. Since such production is still necessary, it may be (partly) displaced to land not previously used for crops, e.g. grassland and forests. This process is known as indirect land use change (ILUC); see <http://ec.europa.eu/energy/en/topics/renewable-energy/biofuels/land-use-change>.

[8] See more details on the existing sustainability framework for biofuels and bioliquids in section 5.

[9] COM/2010/0011 final.

[10] Closing the loop – an EU action plan for the circular economy (COM(2015) 614/2).

1. General information about respondents

★ 1.1. In what capacity are you completing this questionnaire?

- ☐ academic/research institution
- ☐ as an individual / private person
- ☐ civil society organisation
- ☐

- ☐ international organisation
- ☐ other
- ☐ private enterprise
- ☐ professional organisation
- ☒ public authority
- ☐ public enterprise

* 1.7. If you are a public authority, can you define more specifically your area of competence?

- ☒ national government
- ☐ national parliament
- ☐ regional government
- ☐ regional parliament
- ☐ local authority
- ☐ governmental agency
- ☐ other

1.8. If replying as an individual/private person, please give your name; otherwise give the name of your organisation

200 character(s) maximum

N / A

1.9. If your organisation is registered in the Transparency Register, please give your Register ID number.

(If your organisation/institution responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.)

200 character(s) maximum

N / A

1.10. Please give your country of residence/establishment

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece

- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other non-EU European country
- ☐ Other non-EU Asian country
- ☐ Other non-EU African country
- ☒ Other non-EU American country

★ 1.11. Please indicate your preference for the publication of your response on the Commission's website:

(Please note that regardless the option chosen, your contribution may be subject to a request for access to documents under [Regulation 1049/2001](#) on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable [data protection rules](#).)

- ☒ Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- ☐ Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- ☐ Please keep my contribution confidential. (it will not be published, but will be used internally within the Commission)

Perceptions of bioenergy

2.1. Role of bioenergy in the achievement of EU 2030 climate and energy objectives

Please indicate which of the statements below best corresponds to your perception of the role of bioenergy in the renewable energy mix, in particular in view of the EU's 2030 climate and energy objectives:

- ☐ Bioenergy should continue to play a dominant role in the renewable energy mix.
- ☒

































Bioenergy should continue to play an important role in the renewable energy mix, but the share of other renewable energy sources (such as solar, wind, hydro and geothermal) should increase significantly.

- ☐ Bioenergy should not play an important role in the renewable energy mix: other renewable energy sources should become dominant.

2.2. Perception of different types of bioenergy

Please indicate, for each type of bioenergy described below, which statement best corresponds to your perception of the need for public (EU, national, regional) policy intervention (tick one option in each line):

	Should be further promoted	Should be further promoted, but within limits	Should be neither promoted nor discouraged	Should be discouraged	No opinion
Biofuels from food crops	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from energy crops (grass, short rotation coppice, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from waste (municipal solid waste, wood waste)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from agricultural and forest residues	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biofuels from algae	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biogas from manure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biogas from food crops (e.g. maize)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biogas from waste, sewage sludge, etc.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Heat and power from forest biomass (except forest residues)					
Heat and power from forest residues (tree tops, branches, etc.)					
Heat and power from agricultural biomass (energy crops, short rotation coppice)					
Heat and power from industrial residues (such as sawdust or black liquor)					
Heat and power from waste					
Large-scale electricity generation (50 MW or more) from solid biomass					
Commercial heat generation from solid biomass					
Large-scale combined heat and power generation from solid biomass					
Small-scale combined heat and power generation from solid biomass					

Heat generation from biomass in domestic (household) installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Bioenergy based on locally sourced feedstocks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bioenergy based on feedstocks sourced in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bioenergy based on feedstocks imported from non-EU countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify the "other" choice

200 character(s) maximum

3. Benefits and opportunities from bioenergy

3.1. Benefits and opportunities from bioenergy

Bioenergy (biofuel for transport, biomass and biogas for heat and power) is currently promoted as it is considered to be contributing to the EU's renewable energy and climate objectives, and also having other potential benefits to the EU economy and society.

Please rate the contribution of bioenergy, as you see it, to the benefits listed below (one answer per line):

	of critical importance	important	neutral	negative	No opinion
Europe's energy security: safe, secure and affordable energy for European citizens	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Grid balancing including through storage of biomass (in an electricity system with a high proportion of electricity from intermittent renewables)					
Reduction of GHG emissions					
Environmental benefits (including biodiversity)					
Resource efficiency and waste management					
Boosting research and innovation in bio-based industries					
Competitiveness of European industry					
Growth and jobs, including in rural areas					
Sustainable development in developing countries					
Other					

3.2. Any additional views on the benefits and opportunities from bioenergy? Please explain

2500 character(s) maximum

Transportation contributes a quarter of all man-made CO2 emissions. A significant increase in the deployment of bioenergy in transport sector is feasible in a medium-term perspective. Practically no change would be needed in already existing infrastructure and vehicle fleet. Other promising options such as electric and hybrid cars are still beginning to take the roads and would need a near complete replacement of the fleet and infrastructure to support those technologies. Therefore, their uptake in significant proportion is unfortunately many decades away. In this sense, even though all renewable options must be considered in transport sector, biofuels are the only option that can make a massive impact in the nearer-term future in the transport sector.

A sustainable bioenergy policy for a short/medium term objectives must include technologies already available that can produce necessary results. By considering this, European Union may also engage in biofuel sustainable policies that are successful either in the US or in Brazil.

The emergence of commercial scale 2nd generation biofuels, particularly cellulosic ethanol, opens the door for greatly increased scale and

productivity and for the use of agricultural and waste, overcoming the debate about the possibility of competition with food and providing more value and income for rural producers.

Similarly, other forms of sustainable modern bioenergy from solid biomass and biogas should be supported and encouraged, presenting synergies with biofuels and allowing for increased flexibility, adaptability and resilience for the whole value-chain.

4. Risks from bioenergy production and use

4.1. Identification of risks

A number of risks have been identified (e.g. by certain scientists, stakeholders and studies) in relation to bioenergy production and use. These may concern specific biomass resources (agriculture, forest, waste), their origin (sourced in the EU or imported) or their end-uses (heat, electricity, transport).

Please rate the relevance of each of these risks as you see it (one answer per line):

	critical	significant	not very significant	non-existent	No opinion
Change in carbon stock due to deforestation and other direct land-use change in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Change in carbon stock due to deforestation and other direct land-use change in non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect land-use change impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions from the supply chain (e.g. cultivation, processing and transport)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions from combustion of biomass ('biogenic emissions')	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on air quality	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on water and soil	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Impacts on biodiversity					
Varying degrees of efficiency of biomass conversion to energy					
Competition between different uses of biomass (energy, food, industrial uses) due to limited availability of land and feedstocks and/or subsidies for specific uses					
Internal market impact of divergent national sustainability schemes					
Other					

4.2. Any additional views on the risks from bioenergy production and use? Please explain

2500 character(s) maximum

All options above regard the Brazilian context (relevant for considering imports by the EU)

Brazil has acted boldly to promote best practices in the use of biofuels, preventing emissions of more than 300 m tons of CO₂ over the past 12 years (more CO₂ than the total annual emissions of Poland). If we are to consider the whole period since 1975, there were more than 1 b tons of CO₂ avoided. The Sugarcane Agro Ecological Zoning program ensures the environmental sustainability of sugarcane acreage and addresses the need to regulate the expansion of sugarcane production in light of the growing global demand for food and biofuels. The Zoning excludes sensitive areas, such as those with native vegetation, the Amazon and Pantanal biomes, among others. Most of the land that is considered appropriate for sugarcane production is currently covered with pasture for extensive cattle rising or is degraded. Moreover, livestock production is going through a modernization process in Brazil moving from extensive to intensive production: more land will be available for crops production while livestock production will keep increasing. While it is anticipated that most of the increase in ethanol production in the next decade in Brazil shall come from productivity gains and technological advances, the focus of any expansion on the area dedicated to sugar cane will come from pastures abandoned by the intensification of livestock production. Contrary to the traditional "ILUC" narrative, this would happen with no expansion of the agricultural frontier.

The US EPA recognized that Brazilian ethanol reduces GHG emissions by 61% compared to gasoline and qualifies for the advanced biofuels mandate. It is of great importance that the EU define the qualifications of biofuels emissions profile according to its GHG emissions reduction potential.

A study commissioned in Brazil considering the RED methodology for GHG emissions calculations showed that Brazilian soybean biodiesel exported to the EU has a carbon footprint that represents a 68%–72% GHG emissions reduction compared to European diesel.

Regarding E2G, it is known that its production may occur during the whole year and not only in sugarcane traditional harvest period (6 to 7 months). This reduces risks and amplifies the better use of biomass available from sugarcane processing, as it has been proved by the first two 2G ethanol commercial plants already operating in Brazil.

5. Effectiveness of existing EU sustainability scheme for biofuels and bioliquids

In 2009, the EU established a set of sustainability criteria for biofuels (used in transport) and bioliquids (used for electricity and heating). Only biofuels and bioliquids that comply with the criteria can receive government support or count towards national renewable energy targets. The main criteria are as follows:

- Biofuels produced in new installations must achieve GHG savings of at least 60 % in comparison with fossil fuels. In the case of installations that were in operation before 5 October 2015, biofuels must achieve a GHG emissions saving of at least 35 % until 31 December 2017 and at least 50 % from 1 January 2018. Lifecycle emissions taken into account when calculating GHG savings from biofuels include emissions from cultivation, processing, transport and direct land-use change;
- Biofuels cannot be grown in areas converted from land with previously (before 2008) high carbon stock, such as wetlands or forests;
- Biofuels cannot be produced from raw materials obtained from land with high biodiversity, such as primary forests or highly biodiverse grasslands.

In 2015, new rules^[1] came into force that amend the EU legislation on biofuel sustainability (i.e. the Renewable Energy Directive and the Fuel Quality Directive) with a view to reducing the risk of indirect land-use change, preparing the transition to advanced biofuels and supporting renewable electricity in transport. The amendments:

- limit to 7 % the proportion of biofuels from food crops that can be counted towards the 2020 renewable energy targets;
- set an indicative 0.5 % target for advanced biofuels as a reference for national targets to be set by EU countries in 2017;
- maintain the double-counting of advanced biofuels towards the 2020 target of 10 % renewable energy in transport and lay down a harmonised EU list of eligible feedstocks; and
- introduce stronger incentives for the use of renewable electricity in transport (by counting it more towards the 2020 target of 10 % renewable energy use in transport).

[1] Directive (EU) 2015/1513 of the European Parliament and of the Council of 9 September 2015 amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources (OJ L 239, 15.9.2015, p. 1).

5.1. Effectiveness in addressing sustainability risks of biofuels and bioliquids

In your view, how effective has the existing EU sustainability scheme for biofuels and bioliquids been in addressing the risks listed below? (one answer per line)

	effective	partly effective	neutral	counter-productive	No opinion
GHG emissions from cultivation, processing and transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
GHG emissions from direct land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Indirect land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Impacts on biodiversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Impact on soil, air and water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Any additional comments?

2500 character(s) maximum

5.2. Effectiveness in promoting advanced biofuels

In your view, how effective has the sustainability framework for biofuels, including its provisions on indirect land-use change, been in driving the development of 'advanced' biofuels, in particular biofuels produced from ligno-cellulosic material (e.g. grass or straw) or from waste material (e.g. waste vegetable oils)?

- ☐ very effective
- ☐ effective
- ☐ neutral
- ☒ counter-productive
- ☐ no opinion

What additional measures could be taken to further improve the effectiveness in promoting advanced biofuels?

2500 character(s) maximum

Current uncertainty about biofuels policies and mandates represent a relevant obstacle to sustainably scaling up advanced biofuels. Other challenges include lack of recognition and proper pricing of cellulosic biofuels' environmental services and positive externalities; an unpredictable environment in terms of future demand and price, made worse by oil price fluctuations and the maintenance of subsidies to fossil-fuels worldwide; lack of consolidated, diversified and competitive markets; and lack of supply-chain and feedstock management policies appropriate for a cellulosic-enabled bioeconomy. It is important to create predictable business environments in which companies are more willing to invest, trade and grow.

Some suggestions for a clear and ambitious advanced biofuel policy include:

-Provide an EU-wide long-term Mineral Oil Tax Exemption for advanced biofuels like cellulosic ethanol. Today this policy is renewed year by year, and thus discourages long-term planning, which is very detrimental in a field requiring huge initial investments with long maturation times. Such measures would help to avoid the loss of significant volumes of biomass in the form of waste/residue from agricultural production.

-Increase the blending mandate for advanced biofuels in the RED post-2020.

This increase should be in excess of the blending mandate for ethanol in general. E2G has ample room to supply a hypothetical 10% blend in the whole world by 2025 with zero increase in land used. In the meantime, there is enough room to begin with a higher mandate of conventional biofuels and, progressively, to substitute its proportion with 2G biofuels following the pace of its production and supply.

-Adopt an EU-wide incentive policy based on carbon-efficiency for transportation fuels, on the lines of the LCFS policy adopted by the US State of California; and

-Eliminate import taxes and tariffs on imported E2G. Duties applied on all imported ethanol are counterproductive for the environment and dismissive of differences between biofuels from different regions and feedstocks in terms of potential for mitigation of GHG and social and environmental sustainability. While this tariff lasts, however, an exemption should be granted to E2G. Despite using similar feedstocks and sharing some production processes, E2G is fundamentally different from E1G at the source. A clean, renewable and climate, social and environmentally friendly fuel should not be penalized while oil runs free.

5.3. Effectiveness in minimising the administrative burden on operators

In your view, how effective has the EU biofuel sustainability policy been in reducing the administrative burden on operators placing biofuels on the internal market by harmonising sustainability requirements in the Member States (as compared with a situation where these matter would be regulated by national schemes for biofuel sustainability)?

- ☐ very effective
- ☐ effective

- ☐ not effective
- ☒ no opinion

What are the lessons to be learned from implementation of the EU sustainability criteria for biofuels?
What additional measures could be taken to reduce the administrative burden further?

2500 character(s) maximum

5.4. Deployment of innovative technologies

In your view, what is needed to facilitate faster development and deployment of innovative technologies in the area of bioenergy? What are the lessons to be learned from the existing support mechanisms for innovative low-carbon technologies relating to bioenergy?

2500 character(s) maximum

Overcoming the initial "growth slope" for cellulosic biofuels and corresponding challenges will require consistent policies at national and global level, in order to, among others, reduce financial risk, sustainably and efficiently manage feedstock and recognize the unique climate and environmental benefits of E2G. An enabling portfolio of policies at local, national and international levels would ideally target supply, demand, input investment and trade aspects, including, for example:

- Stable and consistent demand-creation policies (i.e. blending mandates) to stimulate cellulosic and other advanced biofuels;
- Stable policies for the internalization of positive externalities achieved by cellulosic biofuels, particularly in carbon efficiency and carbon sequestration (for example awarding for key clear sustainability parameters such as emissions reduction performance compared to fossil fuels and energy yield per hectare);
- Investment and support for innovation and R
- Sustainable, efficient and low carbon territory-specific biomass feedstock management and supply-chain policies;
- Access to financing sources (including climate-mitigation related) and de-risking of investment in cellulosic plants and infrastructure;
- Promoting industry growth and competition;
- Linkage to national, regional and global carbon trading markets and accounting;
- Trade regimes not less advantageous than those for fossil fuels and free from unjustified technical barriers.

6. Effectiveness of existing EU policies in addressing solid and gaseous biomass sustainability issues

6.1. In addition to the non-binding criteria proposed by the Commission in 2010, a number of other EU policies can contribute to the sustainability of solid and gaseous bioenergy in the EU. These include measures in the areas of energy, climate, environment and agriculture.

In your view, how effective are current EU policies in addressing the following risks of negative environmental impacts associated with solid and gaseous biomass used for heat and power? (one answer per line)

	effective	partly effective	neutral	counter-productive	No opinion
Change in carbon stock due to deforestation, forest degradation and other direct land-use change in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Change in carbon stock due to deforestation, forest degradation and other direct land-use change in non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect land-use change impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
GHG emissions from supply chain, e.g. cultivation, processing and transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
GHG emissions from combustion of biomass ('biogenic emissions')	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Air quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Water and soil quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodiversity impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Varying degrees of efficiency of biomass conversion to energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Competition between different uses of biomass (energy, food, industrial uses) due to limited	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

availability of land and feedstocks					
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6.2. Any additional views on the effectiveness of existing EU policies on solid and gaseous biomass?
Please explain

2500 character(s) maximum

Although Article 18(4) of RED mentions the possibility of bilateral or multilateral agreements with third countries containing provisions on sustainability criteria that correspond to those of that Directive as the first mechanisms permissible for proving compliance with the sustainability criteria, this option is yet unexplored, due to an almost exclusive reliance on voluntary schemes for sustainability certification.

Voluntary schemes are by definition optional and as such restricted to a segment of the producers. Considering that cost of certification schemes for small and medium-size farmers further restricts participation in the process, only a small fraction of the producers will be encouraged to comply with the sustainability requirements.

By incorporating local environmental legislation in the process of fulfilling sustainability criteria, the bilateral approach could offer greater flexibility to interact constructively with countries' specific circumstances.

7. Policy objectives for a post-2020 bioenergy sustainability policy

7.1. In your view, what should be the key objectives of an improved EU bioenergy sustainability policy post-2020? Please rank the following objectives in order of importance: most important first; least important 9th/10th (you can rank fewer than 9/10 objectives):

	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th
Contribute to climate change objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoid environmental impacts (biodiversity, air and water quality)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mitigate the impacts of indirect land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote efficient use of the biomass resource, including efficient energy conversion	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote free trade and competition in										

the EU among all end-users of the biomass resource	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure long-term legal certainty for operators	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimise administrative burden for operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promote energy security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote EU industrial competitiveness, growth and jobs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.2. Any other views? Please specify

2500 character(s) maximum

Climate change mitigation, especially in the transport sector, is the number one contribution a revamped EU bioenergy policy has to make. It has to be noted, however, that a number of solutions and policies such as those suggested in previous answers in this survey can contribute simultaneously to several or all of the above goals with very limited tradeoffs.

8. EU action on sustainability of bioenergy

8.1. In your view, is there a need for additional EU policy on bioenergy sustainability?

- ☐ No: the current policy framework (including the sustainability scheme for biofuels and bioliquids, and other EU and national policies covering solid and gaseous biomass) is sufficient.
- ☐ Yes: additional policy is needed for solid and gaseous biomass, but for biofuels and bioliquids the existing scheme is sufficient.
- ☐ Yes: additional policy is needed on biofuels and bioliquids, but for solid and gaseous biomass existing EU and national policies are sufficient.
- ☒ Yes: a new policy is needed covering all types of bioenergy.

8.2. In your view, and given your answers to the previous questions, what should the EU policy framework on the sustainability of bioenergy include? Please be specific

5000 character(s) maximum

An EU policy framework on the sustainability of bioenergy should, first and foremost, include:

- stable, clear and predictable long-term rules and policies that support investments in the research, development, production and commercialization of sustainable forms of bioenergy.
- have as its main goal the contribution to GHG-emissions reduction targets, including present committed targets and the foreseeable periodic reviews mandated by the UNFCCC COP-21 Paris Agreement, with special attention to the transport sector over which such a bioenergy policy could have a substantial and positive impact.
- Feasible and ambitious EU-wide targets for renewable energy in fuel content to create predictable and stable demand to stimulate investments. Targets should be technology neutral, but could be based on distinct brackets according to GHG-reductions performance.
- Clear, unambiguous and objective sustainability criteria should avoid costly and complicated certification processes based on multiple factors hard to quantify. Instead of a "micro" approach to sustainability, a "macro" approach to sustainability should be adopted with a few basic criteria such as GHG reduction performance and energy yields per marginal additional land area, combined with sustainable mandatory practices and laws such as ecological zoning.

Collectively those criteria and policies can contribute in a more efficient

way than a micro approach to certification to the same goals of promoting the sustainability of bioenergy and avoiding negative impacts over food production and biodiversity. At the same time, these criteria can provide incentives for the industry to move to the more sustainable, resource-efficient, and technologically advanced forms of bioenergy.

- On the specific topic of promoting and accelerating deployment of advanced biofuels, an EU policy framework on the sustainability of bioenergy should consider including the measures and policies suggested under our answers to questions 5.2 and 5.4 in this survey.

- In all cases, policies should be based on sound science and not unnecessarily restrict trade.

Finally, the EU should further explore the possibility of concluding bilateral or multilateral agreements with third countries containing provisions on sustainability criteria that correspond to those of the new RED to be approved. By doing so the EU would stimulate other countries to adopt sustainability criteria on the production of biofuels, which could have a very positive effect worldwide. Many developing countries with potential for biomass production would benefit widely from such agreements. Aside from the obvious direct effects on such countries, a more diverse number of countries producing clean energy would bring global positive effects by reducing current geopolitical problems of an oil dependent energy mix.

9. Additional contribution

Do you have other specific views that could not be expressed in the context of your replies to the above questions?

5000 character(s) maximum

Finally, you may upload here any relevant documents, e.g. position papers, that you would like the European Commission to be aware of.

Thank you for participation to the consultation!

Contact

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