

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

* 1.2. If you are a private or public enterprise, could you please indicate your principal business sector?

- Agriculture
- Automotive
- Biotechnology
- Chemicals
- Energy
- Food
- Forestry
- Furniture
- Mechanical Engineering
- Other
- Printing
- Pulp and Paper
- Woodworking

* 1.3. If you are a private or public enterprise, could you please indicate the size of your company?

(Medium-sized enterprise: an enterprise that employs fewer than 250 persons and whose annual turnover does not exceed EUR 50 million or whose annual balance-sheet total does not exceed EUR 43 million.

Small enterprise: an enterprise that employs fewer than 50 persons and whose annual turnover and/or annual balance-sheet total does not exceed EUR 10 million.

Micro-enterprise: an enterprise that employs fewer than 10 persons and whose annual turnover and/or annual balance-sheet total does not exceed EUR 2 million.)

- large enterprise
- medium-sized enterprise
- small enterprise
- micro-enterprise
- I don't know

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

200 character(s) maximum

Weyerhaeuser Company

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

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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Biofuels from energy crops (grass, short rotation coppice, etc.) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| | | | | | |

| | | | | | |
|---|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Biofuels from waste (municipal solid waste, wood waste) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Heat and power from forest biomass (except forest residues) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Heat and power from forest residues (tree tops, branches, etc.) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Heat and power from agricultural biomass (energy crops, short rotation coppice) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Heat and power from industrial residues (such as sawdust or black liquor) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Heat and power from waste | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| | | | | | |

| | | | | | |
|---|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Large-scale electricity generation (50 MW or more) from solid biomass | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Commercial heat generation from solid biomass | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Large-scale combined heat and power generation from solid biomass | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Small-scale combined heat and power generation from solid biomass | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Heat generation from biomass in domestic (household) installations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Bioenergy based on locally sourced feedstocks | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Bioenergy based on feedstocks sourced in the EU | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> |

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) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Reduction of GHG emissions | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Environmental benefits (including biodiversity) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Resource efficiency and waste management | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Boosting research and innovation in bio-based industries | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Competitiveness of European industry | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Growth and jobs, including in rural areas | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Sustainable development in developing countries | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Other | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

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

2500 character(s) maximum

Weyerhaeuser owns and sustainability manages more than 13 million acres of forestland in the United States and is the largest private landowner in the US. Wood pellet markets in the EU create markets for low-grade wood fiber in the U.S. that are extremely beneficial for the practice of sustainable forestry. While Weyerhaeuser primarily manages our forests for the production of higher quality wood products such as saw logs for lumber, markets for low quality wood fiber provide us and other land owners with financially feasible opportunities to implement beneficial sustainable forestry practices. This includes forest thinning which improves forest health, productivity, and biodiversity. It also allows us to use more of every tree harvested for a beneficial purpose and reduces the amount of logging residue left in woods that either decays or must be burned to prepare the site for regeneration.

Paper demand for low-grade wood fiber has been important to us for many years for the same reasons but this demand peaked twenty years ago and has declined seriously since. During the same period of time, productivity from our forests has increased significantly as a result of forestry investments, further increasing the need for treatments such as thinning. Wood pellet markets provide us with a welcome opportunity to replace some of the lost paper markets and to manage increasingly productive lands.

Rural Communities: Wood pellet markets for low-grade wood fiber also help to revitalize and sustain rural communities many of which were hit hard by declining paper markets. These markets not only provide jobs for those who work at pellet facilities, they also provide jobs for loggers and those who provide services and supplies to both the pellet and logging industries. Sustainable rural communities are a critical feature of sustainable societies, providing the infrastructure for the ongoing production of renewable resources whether for energy, paper, or building materials.

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 checked="" type="radio"/> | <input 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Impacts on biodiversity | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input 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 availability of land and feedstocks and/or subsidies for specific uses | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Internal market impact of divergent national sustainability schemes | <input type="radio"/> | <input checked="" 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 type="radio"/> |

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

2500 character(s) maximum

The answers above are provided from the perspective of a forest owner in the U.S.

Environmental risk from forestry in the U.S. is low first of all because of

the comprehensive framework of federal, state, and local forestry regulations, best practices, and programs. Risk is further reduced in the context of wood pellets with the addition of the UK timber standard and the Sustainable Biomass Partnership standard.

Secondly, environmental risk due to wood pellet markets is very low because the value of the market for low-grade wood fiber is too low to result in increased logging because of those markets. For example, internal company calculations have determined that the harvest of a pine plantation specifically for wood pellet markets provides a negative return on the planting investment even when using very optimistic pricing. It does not make economic sense for a forest owner to liquidate its valuable forestry investment simply because a low value market exists. To the extent that it happens, it is where where thinning or other forest restoration is badly needed.

Traditional markets: Similarly, the existing and anticipated value of low-grade wood fiber for wood pellet markets is too low to displace existing healthy markets for that wood fiber. Paper is the predominant traditional market for low-grade wood fiber from forestry and oriented strand board (OSB) is a secondary market. Where healthy paper and OSB markets remain, their capacity to pay for fiber is higher than that of wood pellet markets. This is supported by data presented by the US Industrial Pellet Association (USIPA) and also by our own proprietary business data.

Conversion of land to other uses: Conversion of forests to other uses is the largest risk to forest carbon stocks in the U.S. and occurs when the value of the other use exceeds the use for forests. Wood pellet markets supplement the value of conventional forestry and therefore reduce the risk of conversion to other uses. This is well documented and supported by data presented by the US Industrial Pellet Association. Risk of conversion of natural forests to plantations because of wood pellet markets is low because, as described above, the value of wood fiber for that purpose does not provide a positive return on a conversion and plantation investment, even when using very optimistic pricing for wood pellet feedstock.

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

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

Innovation in the area of bioenergy requires capital investment. The availability of capital requires policy certainty. Markets for the deployment of capital are very competitive. Therefore, achievement of policy certainty within a reasonable time frame and with predictability and confidence will contribute greatly to securing the capital investment over its competition.

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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Change in carbon stock due to deforestation, forest degradation and other direct land-use change in non-EU countries | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Indirect land-use change impacts | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions from supply chain, e.g. cultivation, processing and transport | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| | | | | | |

| | | | | | |
|--|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| GHG emissions from combustion of biomass ('biogenic emissions') | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Air quality | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Water and soil quality | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Biodiversity impacts | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Varying degrees of efficiency of biomass conversion to energy | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Competition between different uses of biomass (energy, food, industrial uses) due to limited availability of land and feedstocks | <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 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

The reason that existing EU policy is effective is that it makes it clear to member nations that sustainability was an important component of achieving EU RED goals. Therefore, those EU stakeholders interested in utilizing solid biofuels to achieve RED goals took early action to secure policy certainty and therefore to also secure capital investment needed to achieve those goals.

The first component of early action was to seek feedstock from sustainable and abundant sources. The United States, for example, has an existing and effective framework of federal, state, and local, policies practices and regulations that contributes significantly to its proven track record. Despite a more than doubling of the population over the last 60 years and the construction of over 90 million homes and a robust post-world war economy, forest area has remained stable while carbon stocks in the United States have increased significantly.

In addition, these early actions of EU RED stakeholders included the development of the UK Timber Standard as it relates to solid biofuels and to the Sustainable Biomass Partnership standards. Weyerhaeuser has participated in both of these venues, not only to ensure an effective and practicable standard, but to ensure that existing practices and processes that have been improved over time could be incorporated.

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 type="radio"/> |
| Avoid environmental impacts (biodiversity, air and water quality) | <input type="radio"/> |
| Mitigate the impacts of indirect land-use change | <input type="radio"/> |
| Promote efficient use of the biomass resource, including efficient energy conversion | <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 checked="" type="radio"/> | <input type="radio"/> |
| Ensure long-term legal certainty for operators | <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"/> |
| Minimise administrative burden 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"/> |
| Promote energy security | <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"/> |
| 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 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

As described before, the environmental risks of wood pellet markets under existing policy are low because of the motivation of EU members to look toward feedstock sources with low environmental risk, such as the U.S. In addition, EU member nations and stakeholders seeking to enable the deployment of capital to achieve long term renewable energy goals have been attracting capital by creating the policy certainty associated with rigorous sustainability standards as rapidly as possible. Examples of this are the UK Timber Standard and the Sustainable Biomass Partnership Standard. Therefore, improvements in the EU sustainability policy should seek to support these existing efforts and to reduce or eliminate risks to investments, operations, and trading in the renewable energy business.

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

The improved EU policy framework should seek to increase policy certainty and should encourage continuous improvement rather than to start over again with new or redundant requirements. This could be done by providing a framework of principles for the EU and EU members. These principles could include the following:

- > Acknowledge the existence and effectiveness of existing policy, regulations, and programs in nations that will be impacted by the EU RED goals.
- > Acknowledge the existing sustainability track record, performance, practices, and customs of countries impacted by EU RED goals.
- > Utilize existing forestry certification schemes such as the Sustainable Forestry Initiative, the American Tree Farm System, the Programme for the Endorsement of Forest Certification, and the Forest Stewardship Council and their credible chain of custody standards.
- > Where forest certification adoption is not prevalent, reward good stewardship by acknowledging sustainability through a sustainability

verification process.

> Where EU nations rely on feedstock from non-EU nations, provide programs of support for sustainable forestry that go beyond the simple uptake of certification.

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

Weyerhaeuser has been practicing sustainable forestry for more than 100 years, has been practicing forestry within a framework of rigorous regulations and best management practices for 40 years and has been implementing auditable sustainability principles consistent with third party certification for 20 years. The Company also employs a large team of forestry professionals and environmental experts. Wood pellet markets in Europe are of interest to us for the sustainability benefits that we have described. We appreciate this opportunity to comment and offer additional discussion as may be needed to provide clarity and to assist in the development of a policy framework that takes advantage of the depth of existing experience and process that already exists.

Weyerhaeuser is also a member of the US Industrial Pellet Association and stand by their comment and rely on the data they have provided along with the company perspective that we describe in these comments to support our input.

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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