

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

Groupe Avril

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

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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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Heat and power from forest residues (tree tops, branches, etc.) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Commercial heat generation from solid biomass | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Large-scale combined heat and power generation from solid biomass | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Small-scale combined heat and power generation from solid biomass | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Bioenergy based on feedstocks sourced in the EU | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Bioenergy based on feedstocks imported from non-EU countries | <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"/> |

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

La bioénergie et les biocarburants en particulier ont de nombreux avantages, tant en termes de développement durable qu'en termes d'emplois et d'indépendance énergétique.

En effet, la Commission européenne souligne, dans son rapport d'étape concernant le secteur des énergies renouvelables publié en juin 2015, que l'utilisation d'énergie renouvelable dans le transport a permis de réduire de presque 35 millions de tonnes les émissions de dioxyde de carbone (CO²), soit une réduction de 9% en 2013 par rapport à 2012. Plus particulièrement, le rapport précise que la majorité de ces économies d'émissions a été permise par l'utilisation des biocarburants. Par ailleurs, notre industrie participe à l'effort d'innovation et investit dans le développement des biocarburants avancés. Notamment, le Groupe Avril est engagé dans des projets de recherche et développement pour des biocarburants à base de déchets et résidus. Notre secteur est donc profondément ancré dans une stratégie de développement durable et contribue activement à la décarbonation du transport.

L'utilisation accrue de biocarburants produits en Europe permet de plus la réduction de consommation de carburants fossiles importés, améliorant ainsi la qualité de l'air et réduisant la dépendance énergétique de l'UE.

D'autre part, alors que le secteur agricole est en crise, la filière des biocarburants offre aux agriculteurs un débouché important et est ainsi un élément de croissance dans les zones rurales et intermédiaires. Notre industrie est génératrice d'emplois non-délocalisables (220 000 en Europe, dont 7200 pour le Groupe Avril), et est complémentaire à la filière agricole des huiles et protéines. Afin d'éviter une précarisation accrue des emplois agricoles, il est donc nécessaire de protéger les investissements réalisés dans la filière des biocarburants, y compris de première génération.

Enfin, les oléagineux, à partir desquels est produit le biodiesel, sont des cultures de rotation et permettent ainsi une gestion responsable des cultures et la diminution des maladies et des traitements. De plus, le colza occupe la terre de l'automne à l'été suivant, garantissant une couverture hivernale et évitant le lessivage des nitrates dans les nappes phréatiques. Ainsi, le biodiesel, notamment le biodiesel de colza, a des effets bénéfiques sur la biodiversité et la qualité des sols et de l'eau.

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 checked="" type="radio"/> | <input 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 type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Indirect land-use change impacts | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input checked="" type="radio"/> |
| Impacts on air quality | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input checked="" 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

Les risques associés aux supposés effets ILUC de la bioénergie doivent être nuancés. Tout d'abord, le concept de l'ILUC ne fait pas l'unanimité au sein de la communauté scientifique internationale, ce qui résulte en des écarts considérables entre les résultats des différentes études menées. Ainsi, l'étude GLOBIOM commanditée par la Commission européenne établit des résultats ILUC 3 à 5 fois supérieurs que l'étude utilisée par l'Agence environnementale californienne pour la qualité de l'air (California Air Resource Board). Alors que l'étude du CARB a utilisé un modèle ouvert et a été approuvée par des scientifiques indépendants, l'étude GLOBIOM manque, elle, cruellement de transparence et n'a pas subi d'examen par les pairs ; dès lors, ses résultats peuvent être mis en doute. Par ailleurs, le concept de l'ILUC lui-même est souvent mal interprété : il doit non seulement être considéré dans le cadre d'un amortissement des émissions dans le temps, mais aussi comme un phénomène de mauvaise gouvernance régionale. Les émissions liées à l'ILUC sont en effet des émissions initiales liées au changement éventuel d'affectation des terres, que l'on peut définir comme une « dette ILUC » : au fur et à mesure du temps, les biocarburants permettent des économies d'émissions qui finissent par compenser la dette ILUC initiale. De plus, ce phénomène ILUC est inexistant en Europe, et est dû à une mauvaise gouvernance dans la culture de l'huile de palme en Asie du Sud-Est. Il est ainsi injuste et incohérent de faire porter la faute de cette mauvaise gouvernance aux producteurs européens n'utilisant pas d'huile de palme importée.

D'autre part, la filière est engagée dans la réduction des émissions liées à la chaîne de production. Le Groupe Avril a par exemple mis en place le « club des 20 grammes », qui rassemble des agriculteurs engagés dans des pratiques culturales innovantes, susceptibles de ramener les émissions de gaz à effet de serre à moins de 20g de CO₂/MJ de biodiesel. Via la une Démarche de Progrès, des investissements massifs dans les unités de production du Groupe ont aussi permis de réaliser des économies d'énergie de 35% entre 2010 et 2013.

Enfin, les biocarburants participent à la réduction de la consommation des carburants fossiles et ainsi à la réduction des polluants atmosphériques (émissions de particules) qu'ils produisent. En ce sens, ils ne présentent pas un risque mais bien une opportunité pour l'amélioration de la qualité de l'air en Europe.

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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions from direct land-use change | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Indirect land-use change | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| | | | | | |

| | | | | | |
|-------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Impacts on biodiversity | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Impact on soil, air and water | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Any additional comments?

2500 character(s) maximum

Afin de comptabiliser comme de l'énergie renouvelable dans le cadre des Directives Energies Renouvelables (RED) et Qualité des Carburants (FQD), les biocarburants doivent réaliser 35% d'économie d'émissions par rapport à celles des carburants fossiles (50% en 2018). Leur intensité carbone est donc comparée à celle des carburants fossiles, un « comparateur fossile » de 83,8 gCO₂eq/MJ. Or dans le cadre de la Directive 2015/652, la Commission a reconnu que cette valeur était trop faible et proposé une nouvelle « valeur de référence » de 94,1gCO₂eq/MJ. Or, les économies d'émissions CO₂ des biocarburants sont toujours évaluées par rapport à l'ancien « comparateur fossile ». Cette différence de traitement minimise de facto les économies d'émissions des biocarburants. Ainsi, afin d'évaluer correctement leur rôle dans la décarbonisation, nous appelons la Commission à mettre à jour le « comparateur fossile » et veiller à ne pas pénaliser les biocarburants européens par rapport aux carburants fossiles.

Par ailleurs, les modalités actuelles de reconnaissance des schémas volontaires posent de nombreux problèmes en raison d'une interprétation excessivement technique des dispositions de la RED qui pourrait conduire à ne pas renouveler certains schémas respectant pourtant les critères de durabilité. Une refonte des règles d'évaluation est nécessaire, afin de prendre en compte les résultats obtenus au regard des critères de durabilité plutôt que leurs modalités de fonctionnement. Cette approche garantira le respect des critères de durabilité sans créer de charge administrative déraisonnable pour les opérateurs. En outre, les règles actuelles n'imposent pas la reconnaissance mutuelle des schémas volontaires, fragmentant le marché intérieur et entravant la libre circulation alors même que les critères de durabilité sont harmonisés. Nous appelons donc à la reconnaissance mutuelle automatique des schémas volontaires reconnus par la Commission.

Enfin, l'application hétérogène des directives RED et FQD crée une distorsion du marché des biocarburants en Europe. En effet, l'instauration de système de quotas plutôt qu'une obligation d'incorporation des biocarburants, ainsi que les systèmes différents de comptage multiple de certains types de biocarburants, entraînent une valorisation hétérogène des matières premières dans le marché intérieur et contribuent au développement de mouvements commerciaux d'optimisation, voire de fraudes.

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

Les limitations imposées à la filière des biocarburants en Europe - via la Directive ILUC et un comparateur fossile inadapté - ont contribué à limiter les investissements dans le secteur. Or, le Groupe Avril, comme d'autres industriels des biocarburants de première génération, investit aussi dans le développement des biocarburants avancés. Ainsi, le cadre réglementaire instable et la mise en péril des investissements dans les biocarburants de première génération ont aussi nui au développement des biocarburants avancés. Un environnement politique et réglementaire stable, et un maintien d'un objectif d'incorporation d'énergie renouvelable dans le transport après 2020 sont donc des mesures cruciales pour assurer le développement des avancés dans les années à venir.

Par ailleurs, il est nécessaire de s'assurer de l'origine des matières premières utilisées pour les biocarburants avancés, à travers une meilleure traçabilité et des mécanismes de certification efficaces, afin d'éviter les fraudes et permettre un développement sain des énergies renouvelables dans le marché intérieur européen.

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

Pas d'opinion.

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

Afin de faciliter le développement et le déploiement des technologies innovantes dans le secteur de la bioénergie, il est indispensable de ne pas répéter les erreurs commises dans le passé concernant l'instabilité des politiques européennes. Assurer un environnement réglementaire stable et protéger les investissements réalisés est donc crucial, ainsi que faciliter l'accès aux financements pour les acteurs.

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

Pas d'opinion

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"/> | <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"/> |
| Avoid environmental impacts (biodiversity, air and water quality) | <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"/> |
| Mitigate the impacts of indirect land-use change | <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"/> |
| Promote efficient use of the biomass resource, including efficient energy conversion | <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 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 type="radio"/> | <input checked="" 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 checked="" 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 checked="" 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 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"/> |
| 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

La filière des biocarburants est une composante importante de la filière agricole en générale, étant donné sa complémentarité avec les secteurs des huiles et protéines. Protéger les emplois dans les zones rurales et intermédiaires en soutenant les biocarburants, qui sont un débouché-clé et une source de revenus importante pour les agriculteurs, devrait donc être un objectif central de la politique de la durabilité de la bioénergie.

De plus, alors que les débats sur la Directive ILUC ont fortement nui au secteur des biocarburants et mis en péril les investissements réalisés quelques années seulement après la Directive RED, il est crucial d'assurer la stabilité du cadre réglementaire, aux niveaux européen et national.

La politique de durabilité de la bioénergie pour la période post-2020 devrait enfin reconnaître le rôle de la bioénergie dans la réduction des émissions, notamment le rôle des biocarburants dans le transport, et ainsi encourager leur développement et leur utilisation. Ces mesures d'incitation devraient comprendre l'introduction d'un objectif d'incorporation d'énergie renouvelable dans le transport post-2020.

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

Etant donné le manque d'unanimité de la science ILUC, et son manque de pertinence dans le cadre d'une production à base de matières premières locales européennes, la politique existante de durabilité des biocarburants répond aux préoccupations environnementales de l'Union Européenne. En effet, les critères de durabilité existants garantissent que les biocarburants produits en Europe aujourd'hui émettent 35% de moins d'émissions de CO2 que les carburants fossiles, et 50% à partir du 1er janvier 2018. Cette politique ambitieuse permet à l'Union Européenne et ses Etats Membres d'être à la pointe de la durabilité de la bioénergie. Les biocarburants assurent aujourd'hui la baisse

des émissions dans le secteur du transport, et contribue à l'amélioration de la qualité de l'air, de la biodiversité et de la qualité de l'eau et des sols. Nous appelons donc l'UE à maintenir un environnement réglementaire stable et à protéger les investissements dans les biocarburants qui ont été réalisés ces dernières années.

Cependant, le cadre réglementaire pour la durabilité de la biomasse doit être revu. En effet, la situation législative actuelle entraîne des incohérences, dans la mesure où certaines matières premières – telles que l'huile de palme – doivent répondre à des critères de durabilité stricts quand elles sont utilisées pour des biocarburants, tandis que ces critères sont inexistantes quand elles sont utilisées pour de la biomasse à des fins de cogénération électrique. Les mêmes critères de durabilité doivent donc être appliqués afin de garantir une durabilité et une performance environnementale optimales des matières premières utilisées pour la bioénergie en Europe, quel que soit leur utilisation finale.

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.

[dfd60766-3c5b-4a34-80f1-79a885672b74/Demarche_de_Progres_Groupe_Avril.pdf](#)

[7149c3d1-5beb-412a-a86f-8df7b18fe125/Note_de_position_Groupe_Avril_Mai_2016.pdf](#)

Thank you for participation to the consultation!

Contact

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