

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

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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 checked="" 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 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input 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) | <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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input 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 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 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"/> |

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 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please specify the "other" choice

200 character(s) maximum

Perennial energy crops provide additional ecosystem services such as possible role in flood mitigation, water quality improvement, erosion control and the provision of pollination services

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

2500 character(s) maximum

SRC and miscanthus are multifunctional environmental crops: 1) They provide excellent land resource efficiency 2) Increase in farm biodiversity: The headlands and rides around perennial energy crop (PEC) plantations are thriving with wildlife. SRC plantations provides habitats for a diverse community of birds, small mammals, flying insects, phytophagous insects, arthropod predators and soil micro-organisms. Many of these are predators and control pests in adjacent food crops. At least 12 priority bird species with red or amber conservation status are frequently found in and around PEC plantations. 3) Improvements in water quality: Appropriately sited SRC plantations will intercept nitrate and phosphate run off from both diffuse and point sources, particularly if sited between the pollution origin and watercourses. Impressive results have been achieved with large scale water biofiltration from sewage treatment works and on a smaller scale from farm slurry storage and grey water sources. 4) Flood defence: SRC and miscanthus planted on flood plains enhances sediment retention and delays the flow of flood water because of the very high number of stems per hectare - termed "hydraulic roughness". As a result, the peak flow is both delayed and significantly reduced, so diminishing the intensity of flood damage and allowing extra time to implement temporary flood protection measures downstream. 5) Carbon sequestration: large amounts of carbon are stored in the soil 6) Rebuilding bee and other pollinator populations. SRC willow provides crucial pollen and nectar sources during the late winter/early spring period when there are few other sources. Early pollen derived protein is key to building up insect population numbers, which influences the level of pollination in both agricultural and wild plant populations later in the season. 7) Improvement in local air quality: taller crops such as SRC filter airborne ammonia emissions from dairy, poultry and pig farms, landfills, sewage treatment works etc. 8) Rehabilitation of contaminated land: the annual leaf litter return from PECs improves the soil structure and nutrient status of poor quality soils and greatly increases invertebrate populations. 9) Control of soil erosion: SRC can stabilise fragile soils and reduce erosion on slopes and near watercourses 10) PEC can be used to build biosecurity barriers between farms to reduce the spread of livestock infections

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 checked="" type="radio"/> | <input 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 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Impacts on biodiversity | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Varying degrees of efficiency of biomass conversion to energy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input 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 multifunctionality of SRC (and miscanthus) is widely documented in research papers but unfortunately the flexibility of these crops has not been embraced by policy makers. SRC has been included as an Ecological Focus Area (EFA) option in some countries (under the current CAP) but where this is the case it has been assigned one of the lowest weightings (0.3). This discriminates against SRC as it requires as much as five times the amount of land to be taken up compared to other measures. This is unfortunate as it denies farmers the opportunity to grow SRC for the many additional societal benefits that it can provide.

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 type="radio"/> | <input type="radio"/> | <input checked="" 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

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

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 type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions from supply chain, e.g. cultivation, processing and transport | <input type="radio"/> | <input checked="" 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 type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Biodiversity impacts | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input 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 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 type="radio"/> |

| | | | | | |
|-------------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| availability of land and feedstocks | | | | | |
| 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

The Greening measures under CAP are unlikely to increase perennial energy crop planting. Miscanthus, SRC or SRF are not on the list of eligible diversification crops for arable land, but could be planted to reduce the total arable area below key trigger points. SRC has been included as an Ecological Focus Area (EFA) measure in some countries. However, the weighting factor of 0.3 is much lower than other options (e.g. hedges, fallow land etc.). The weighting for nitrogen fixing crops such as soy beans is 0.7. The latter are high input crops that do not provide the multitude of benefits that SRC (and miscanthus) can provide. The potential role for SRC in particular in flood mitigation and increasing pollination services needs to be more widely understood and harnessed in EU/National policies.

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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Promote efficient use of the biomass resource, including efficient energy conversion | <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"/> |
| 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Ensure long-term legal certainty 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"/> |
| Minimise administrative burden for operators | <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 energy security | <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 EU industrial competitiveness, growth and jobs | <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"/> |
| 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

The publication The Best use of UK Agricultural Land available at <http://www.cisl.cam.ac.uk/business-platforms/natural-capital-leaders-platform.aspx> states "Where land can deliver multiple benefits - such as forestry or perennial crops providing both a source of timber and energy as well as water management, carbon storage and wildlife benefits - all of these should be understood, valued and their multiple delivery actively encouraged and rewarded".

As we are acutely aware of the finite level of land it is important to make the most of our resources. Perennial energy crops can deliver energy production and a wide range of ecosystem services. As such they should be actively encouraged.

Currently there are around 50,000 hectares of SRC and perhaps 60,000 hectares of miscanthus/reed canary grass in the EU28. Even the most parsimonious estimates by energy crop sceptics such as Bird Life International suggest that 1.35 million hectares of land are available for energy crops.

http://www.birdlife.org/sites/default/files/attachments/IEEP_2014_Space_for_Energy_Crops_0.pdf

More realistic estimates where perennial energy crops could be planted on proportions of contaminated land, marginal land and and low % of arable suggest figures of 8-25 million hectares.

<http://3d3a514068.url-de-test.ws/wp-content/uploads/2014/06/presentation-Annika-Henriksson-Bryssel-2-dec.pdf>

As a result the current land take is a drop in the ocean. In order to create a viable industry we need further promotion and policy measures that help the industry expand and meet energy and climate change objectives and not more caveats that restrict growth.

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

- Greater understanding and exploitation of multifunctional attributes of perennial energy crops (such as role in flood mitigation, water quality improvement, erosion control and the provision of pollination services)
- Possible mapping of areas where perennial energy crops could have greatest multifunctional role and encouragement of elevated planting in these areas
- Increased weighting in Ecological Focus Areas (it should be at least 0.7 and possibly 1.0) to reflect the environmental benefits of the crop
- Develop best practice protocols for using perennial energy crops for environmental benefits - e.g. the best way to plant SRC and miscanthus to improve flood mitigation; best way to plant SRC to maximise pollination services in late winter early spring

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

Papers that support the assertions made in this response:

Natural Capital Leaders Platform : The Best use of UK Agricultural Land.
Cambridge Institute for Sustainability Leadership June 2014.

<http://www.cisl.cam.ac.uk/business-platforms/natural-capital-leaders-platform.aspx>

Rokwood Joint Action Plan for Short Rotation Plantations. March 2015

<http://rokwood.eu/public-library/joint-action-plan/send/26-joint-action-plan/44-rokwood-joint-action-plan.html>

CAP REFORM CONSULTATION - Response from a broad coalition supporting short rotation

coppice and the energy crops sector. Crops for Energy November 2013

<http://www.crops4energy.co.uk/wp-content/uploads/2013/11/SRC-coalition-CAP-reform-response-SEWF-logo.pdf>

Woodland for Water: Woodland measures for meeting Water Framework Directive objectives. Forest Research 2011.

[http://www.forestry.gov.uk/pdf/FRMG004_Woodland4Water.pdf/\\$FILE/FRMG004_Woodland4Water.pdf](http://www.forestry.gov.uk/pdf/FRMG004_Woodland4Water.pdf/$FILE/FRMG004_Woodland4Water.pdf)

WILLOWS BEYOND WETLANDS: USES OF SALIX L. SPECIES FOR ENVIRONMENTAL PROJECTS. YULIA A.KUZOVKINA and MARTIN F. QUIGLEY. 2004.

http://cag.uconn.edu/plsc/plsc/files/Kuzovkina_2_3892275331.pdf

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

✉ SG-D3-BIOENERGY@ec.europa.eu
