

Vattenfall position on a sustainable EU bioenergy policy for the period after 2020

- Vattenfall believes that the use of sustainable solid biomass for energy can and should make a meaningful contribution to climate change mitigation and to the transition to a sustainable energy system.
- In our view, an improved EU bioenergy sustainability policy should include European binding sustainability criteria for solid biomass. They are crucial for the credibility of the energy sector as well as for creating a level playing field in the development of the biomass market. Criteria should
 - be based on existing Sustainable Forest Management Criteria (SFM)
 - include a GHG requirement for the entire supply chain
- For the GHG performance of the supply chain we support the already existing EC-methodology for the calculation of GHG-emissions. Thereby the use of default-values reduces administrative burden for parameters that have a limited effect on the total GHG emissions of the supply chain.
- The level of burden of proof for compliance should depend on the type of raw material used for energy and existing national forest legislation should be taken into account to show compliance.
 - For biomass from normal multi-functional forest operations and primary residues we see 2 options to demonstrate compliance with SFM requirements that should be allowed:
 - a) Certification of the forest owner against existing SFM certification systems incl. FSC and PEFC,
 - b) Certification of the biomass producer (e.g. pellet mill) against existing certification systems such as SBP that take a regional risk-based approach
 - For secondary processing residues such as saw dust it should be sufficient to ensure compliance with the EU Timber Regulation and the GHG criteria
- To ensure a credible and cost-effective functioning of the sustainability requirements, the processes for implementation and verification of the criteria are as important as the criteria themselves. In order to keep administrative costs down, the EC should cater for various means of demonstrating compliance with sustainability criteria. Existing voluntary schemes (e.g. SBP) should be recognized and a risk-based approach should apply.