

Will sustainability criteria for solid biomass
(mandatory or voluntary) be strong enough
to effectively ensure the environmentally sound
production of biomass?

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Will sustainability criteria for solid biomass (mandatory or voluntary) be strong enough to effectively ensure the environmentally sound production of biomass?

No! This is a too narrow approach.

As long as sustainability of consumption levels is not addressed, overall forest management lacks important criteria to protect biodiversity, and material use of wood faces unfair competition (unilateral subsidies for energy use), criteria and certification alone are not enough!



Do we need EU-wide harmonized mandatory sustainability criteria
at all?



YES !

Clearcut in Sweden, 2010

If a minimum GHG emission reduction threshold were to be introduced, it should be:



Above 70% GHG reduction against a EU-wide fossil fuel comparator for heat and electricity.

If criteria were to be introduced, the EC is considering a size of 1 MWth / MWe and above for end-users requiring proof of sustainability certification.



That size is too big

Should woody biomass directly sourced from forests for bioenergy only come from sustainably managed forests, i.e. require certification (such as FSC or PEFC)?



Yes, although PEFC and ...



...and FSC are not always a guarantee for sustainable and ecological forest management!

FSC-certified „forestry in South Africa.

courtesy: www.fsc-watch.org



Compared to the approach by ISCC for Agrofuels, where farmers have mainly to meet cross compliance requirements to be certified, this would mean that so-called sustainable forestry in Europe would guarantee compliance, which is too weak. As long as sustainability criteria in member states are not really comparable, not mandatory and lack important means to protect biodiversity, soils and carbon stocks, an upgrade is needed first.



"Maintaining unsustainable consumption patterns is determining what is considered sustainable forest management today. A meaningful discussion about a sustainable future use of forests in Europe however would turn this debate upside down so policies would be guided by what forests can sustain, not by what is needed to sustain unsustainable consumption levels."

Veerle Doossche, FERN, Brussels

Examples for ecological challenges in forest management



We need minimum thresholds for biotope wood in our forests (e.g. about 60-100 m³/ha in Germany), in order to save Biodiversity.



Nationalpark Kellerwald, a totally protected area of almost 6.000 ha. In Germany, a total of 550.000 hectares of forests shall be protected, according to the national Biodiversity Strategy.

Conclusions

Consumption patterns and levels have to respect what forests can deliver sustainably in the long term



Forest management

Forest management needs to be well defined by the adoption of a set of criteria and indicators that ensures that forestry operations are environmentally sound, socially just and contribute to the objectives of the Renewable Energy Directive.



No go areas

The no go areas that are defined for agrofuels should be reconsidered as they are not sufficient and include loopholes.

No go areas should be defined according to international and national biodiversity strategies





GHG balance

Because of the multi-annual nature of woody biomass, the GHG methodology for agrofuels cannot be applied to biomass.

Use absolute GHG performance figures for different pathways instead of trying to compare GHG savings. Maximum GHG performance levels for different pathways must be defined.

All inefficient processes should be excluded.

Certification cannot address policy and institutional failures

Certification cannot address over-consumption.

Certification cannot address 'macro-effects', e.g.:

displacement of activities e.g. to high conservation value areas, indirect GHG emissions, impact on food security and livelihood, segmentation of the market (eg. certified products are for export market or for another sector and so certification does not lead to reduction of the problem)

Certification creates a burden for good suppliers; i.e. certification schemes increase costs for 'good' or 'sustainable' products but leave market open for 'non-good' 'non sustainable' products.

Part of this timber never should have been removed from the forest !



Hollow trees, an important biotope!



Thank you for your attention!

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