



**To:**

Temenuzhka Petkova, Ministry of  
Energy – Republic of Bulgaria  
José Blanco López, Member of the European  
Parliament  
Miguel Arias Cañete, European  
Commissioner for Climate Action & Energy

**Cc:**

Maria Koleva, Permanent Representation of  
Bulgaria to the EU, Fredrick Federley MEP,  
Hans-Olaf Henkel MEP, Seán Kelly MEP,  
Paloma López Bermejo MEP, Claude Turmes  
MEP, Dario Tamburrano MEP, Marijana Petir  
MEP, Bas Eickhout MEP, Eleonora Evi MEP  
Dominique Ristori, Director-General  
European Commission, Mechthild  
Wörnsdörfer, Director European Commission

Brussels, 23 February 2018

**Re: Appeal from the forestry and agricultural sectors to recognise the role of forest bioenergy in the Renewable Energy Directive post-2020**

Dear Minister Petkova, dear MEP Blanco López, dear Commissioner Arias Cañete,

On behalf of the European forest owners and managers, farmers and their cooperatives, sawmill industry, forest workers, contractors and professionals, we would like to draw your attention to our main concerns in view of the upcoming trilogue negotiations on the recast of the Renewable Energy Directive.

Forests and the forest-based sector play a significant role in mitigating climate change. They contribute to defossilizing the European economy, enabling the transition to a bioeconomy, increasing the renewable energy share of the EU's total energy consumption, fostering energy efficiency and promoting the efficient use of natural resources. While this can create new opportunities for the forest-based sector, care needs to be taken that EU policies do not create counterproductive results, not only for forests and the forest-

based sector themselves, but also for their potential contribution to the EU post-2020 climate and energy targets.

#### **SUSTAINABILITY REQUIREMENTS - ARTICLE 26**

Signatories of this letter support the Council's approach on the sustainability requirements for forest biomass for bioenergy embraced in the so-called risk-based approach. Having a simple and clear set of requirements as a part of a risk-based system is the only acceptable way to incorporate the sustainability of forest biomass into the EU legislation. However, this should not lead to any shift regarding the applicability of subsidiarity principle to forests and forest management in the EU.

The signatories of this letter cannot accept inclusion of imprecise wording of sustainability requirements number iv), v) nor the completely new requirement (vi). In particular, the requirement (vi): "environmental and nature regulations or measures are in place and in line with the relevant Union environmental and nature standards", proposed by the European Parliament, is highly problematic as it is superficial to other requirements, includes imprecise wording and could impose unnecessary administrative and legislative burdens. Moreover, it should be noted that requirements iv) and v) were not a part of the Commission Impact Assessment and, therefore, it is unnecessary to add them to the new EU legislation addressing bioenergy sustainability.

It should be reiterated that sustainable forest management (SFM) principles, developed according to commonly agreed Pan-European principles by the Forest Europe process, have been incorporated in Member States' forest and nature conservation legislations. In addition, SFM is subject to market-based certification schemes.

In addition, in order to fulfill the principle of subsidiarity and ensure Member State competences, it is important that Commission's provisions remain limited to the development of guidance for demonstrating compliance with the sustainability requirements, in line with the Council position.

#### **MARKET DISTORTIONS - ARTICLES 3 and 4**

Regarding Articles 3 and 4 on bioenergy subsidies and targets, it is important that the final wording is consistent with the Commission's Impact Assessment on the sustainability of bioenergy, without any references to distortion of raw material markets or any indirect references to the cascade use principle. These amendments may limit the use of certain biomass assortments and therefore indirectly enshrines the cascading use into EU legislation. Regulating cascade use may hinder innovation and resource efficiency by generating sub-optimal value cycles, have distortive market effects and lead to increased costs and administrative burden. Therefore, the Commission's position, which includes potential interference in the electricity market, is sufficient in this context.

#### **ADVANCED BIOFUELS - ARTICLE 25**

Advanced biofuels is one of the solutions to ensure a more climate-friendly transport sector and will contribute to a sustainable forestry sector as well as growth and jobs in EU rural areas. It is crucial to keep the trust of current and new investors in EU biofuel policies, and therefore it is important to maintain Article 25 as proposed by the Commission and the Parliament

We hope that our concerns will be granted for your full consideration. We remain at your disposal should you have any points to clarify.

Thank you in advance for your support in this crucial matter.

Sincerely,

**Hubert de Schorlemer**

President of Confederation of European Forest Owners - CEPF

**Per-Olof Wedin**

President of European State Forest Association - EUSTAFOR

**Joachim Rukwied**

President of European Farmers - COPA

**Thomas Magnusson**

President of European Agri-Cooperatives - COGECA

**Pierre Olivier Drège**

President of European Landowners' Organisation - ELO

**Simo Jaakkola**

Vice-President of European Organisation of Agricultural, Rural and Forestry Contractors - CEETTAR

**Jannes Maes**

President of European Council of Young Farmers - CEJA

**Sampsa Auvinen**

President of European Organisation of the Sawmill Industry - EOS

**Michael Diemer**

President, Union of European Foresters - UEF

**Bruno Lafon**

President of Union of Foresters of Southern Europe - USSE