



WWF POSITION STATEMENT – CLIMATE & ENERGY PACKAGE

WWF demands for the legal implementation of sustainability criteria for bioenergy in the European Union

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HOW TO IMPROVE THE DIRECTIVE ON THE PROMOTION OF THE USE OF ENERGY FROM RENEWABLE AND ENSURE SUSTAINABILITY OF BIOENERGY

WWF supports bioenergy that significantly reduces greenhouse gas (GHG) emissions and that is not harmful to the environment or to people. The European Commission proposed a 10% renewable energy target in the transport sector in the Directive on the promotion of the use of energy from renewable sources.

WWF will only support the target, if a meaningful scheme is put in place, which would ensure the sustainability of all bioenergy feedstocks regardless of their end-use (liquid fuels and solid biomass for transport, heat or electricity). Social and environmental impacts of bioenergy production should be tackled to avoid unwanted sources in the supply chain. The current European Commission proposal is not strong enough to guarantee a sustainable bioenergy supply.

Adopt both social and environmental criteria

The proposal aims to ensure environmental sustainability for biofuels and bioliquids only. WWF thinks that the

social impacts of bioenergy production are equally as important. Workers rights as well as land rights need to be respected during the production of biomass for the European market. As a first step, WWF proposes the inclusion of social standards as set out in international norms and conventions, in particular relevant ILO conventions and UN declarations on rights of indigenous peoples. The Commission should also monitor food prices and food availability and should foresee corrective measures to avoid any severe disturbances.

Create a sustainability scheme for all bioenergy, including solid biomass

Whether biomass is used for transport, heat, power or even food and pharmaceuticals, its production can have the same environmental and social impacts. Very often raw materials could be used within several bioenergy supply chains, for example palm oil is used to produce biodiesel for transport applications as well as for heat and power production. Wood is a widely used biomass for heat and power and in the future is likely to be a source of second generation biofuels. Logically, sustainability standards in the renewable energy directive should be applied to all bioenergies, instead of solely biofuels and bioliquids.

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Link incentives for biofuels with greenhouse gas reductions of the biofuels, be transparent concerning data and methodology and avoid conversion of carbon-rich areas.

The current proposal is asking for a volume target of renewable transport energy to be supplied in the EU, not for a level of GHG cuts to be achieved by using renewable energy in transport. However, not all biofuels achieve the same level of greenhouse gas savings.

To fend-off the worst performing biofuels and to lead to the most efficient use of biomass for energy, WWF supports the idea of a minimum GHG saving with a cut-off point. The level of minimum greenhouse gas savings that will be chosen should ban biofuels that do not contribute substantially to climate change mitigation. Furthermore, WWF also wants to see biofuel incentives and obligations linked to greenhouse gas savings. Biofuels that achieve higher GHG savings could be rewarded by allowing those biofuels to count more towards national targets or by allowing them higher tax rebates.

There should be a single accepted methodology for calculating life-cycle GHG balances of biofuels based on the best international and up-to-date peer reviewed science available. This needs to be set out clearly and in a transparent way. Member States and companies supplying biofuels should be able to implement the methodology consistently and comparably across the EU and for all biofuels accounting towards the target. In the current proposal there is a serious lack of data e.g. on land use changes and on the use of soy.

The research for calculating GHG balances is evolving. Therefore the underlying default values for the calculation of greenhouse gas emissions within the

Directive should be updated with relevant stakeholders and in an open way two years after the EU directive is put into force.

Carbon rich areas, such as peatlands, forests and permanent grasslands, should not be converted for the production of biofuels, as the conversion would automatically neutralise any GHG savings the biofuels could bring over a reasonable plantation lifetime.

Include a process to assess high conservation value areas

WWF believes that a robust process of identifying conservation values should be put into the legislation ahead of any list of go or no-go areas. Any list will always have gaps or include areas that could in fact be used.

Not all high conservation value areas are within established protected areas or are included in the Commissions proposal of areas of no conversion. Very valuable areas are in danger of being lost for bioenergy production. WWF wants to see a process included in the Directive, which ensures the protection of all high conservation areas, unless the bioenergy feedstock production is maintaining or enhancing critical ecological values.

These values include threatened species, endemic species, large intact landscapes and socio-economic values and services such as climate change mitigation, drinking water supply and non timber forest products which are fundamental to meet basic needs of local communities and flood and erosion control. The HCV Framework provides a process for identifying these values with relevant stakeholders in a transparent and participative way.

Member States must ensure that all biofuels supplied against the targets have not come from land that has been credibly identified as having high conservation values in January 2008 by for instance undertaking a HCV framework assessment. No biofuels will be able to be used to meet the target if it does not have adequate evidence of the process having been undertaken to acceptable standards.

Include better environmental management practices for all raw material produced domestically or in third countries

The proposal of the Directive does not address any environmental impacts apart from carbon release and biodiversity loss. Several other environmental impacts are very important and are easy to include within a comprehensive system of standards. WWF recommends that all farmers producing bioenergy crops use a farm/forest management system, together with an appropriate verification system with assurances against fraud and in favour of environmental stewardship.

WWF recommends implementing a set of environmental criteria for all producers of biomass for bioenergy. The following list of environmental criteria covers the key environmental impacts:

- limit pollution by minimizing the use of fertilizers and pesticides. As a measure the net amount of nitrogen and toxicity units used per unit yield should be assessed and limited;
- avoid negative changes to soil functions fertility. Maintain soil and surface organic matter;
- avoid significant negative change to ground and surface water quantity and quality: Water use/unit yield (where/when water is scarce) should be limited;

- avoid negative impacts on biodiversity and ecosystems within bioenergy production systems; and
- minimize emissions, which lead to acidification, eutrophication, ozone degradation and toxicity

Some existing voluntary commodity certification schemes, such as the Roundtable on Sustainable Palm Oil, cover these key environmental criteria, so by accreditation of voluntary systems the overall criteria could be reached.

Some commodities used for bioenergy production, are not covered by existing voluntary schemes. As a first step the EU should require companies using these commodities to report on the impacts of production against the above mentioned environmental criteria. Such reporting should require credible, transparent third party auditing against the core principles and criteria even if specific commodity relevant indicators are not yet available.

Design a credible Meta-Standard system with transparent accreditation

The RES directive has not defined how and by whom the voluntary certification systems will be accredited. For WWF this is not acceptable given that the design of a “Meta-standard” will have much in common with the blueprint of a certification scheme. The credibility and the effectiveness of the Meta-standard to deliver on sustainability will largely depend on the performance, or measurable results, of the certification schemes/systems on which it is built.

So setting up the Meta-standard should go through the following main steps:

- Establishing a stakeholder process to a credible level that will define and develop the meta-standard and the accreditation of already existing voluntary certification schemes.
- Developing a set of clearly defined principles and criteria, which together address the key environmental and social impacts of biomass and make up the definition of sustainable produced biomass.
- Establishing the procedures and norms for benchmarking the sustainability criteria of existing standards against the sustainability criteria of the meta-standard.

In addition, a representative and inclusive institution to deal with standard setting, accreditation and evaluation will need to be set up.

If the European Commission leaves the selection of suitable certification schemes to a Committee, clear first guidance about elements of credible certification schemes should be included in the Renewable Energy Directive. If no initiative exists for some types of commodities, certifiers should develop adapted indicators, based on the principles and criteria of the meta-standard scheme. These indicators would be accredited by the European Commission.

Develop a methodology for the assessment of idle land and include incentives to use it

To take pressure away from land used for food production and to avoid indirect land use change, idle (unused land) could be used for the further expansion of bioenergy. To define suitable land there has to be a clear procedure for assessment and a robust participation process to avoid undesirable social and environmental impacts. Once an adequate precautionary approach for the use of idle land has been established, the use of idle land to produce raw material for bioenergy should be incentivised by 2012 at the latest.

Include qualifying bilateral and multilateral agreements

WWF considers that tools like bilateral and multilateral agreements could be used to develop pioneering work and projects for some of the indirect impacts (which certification schemes are unable to address) like displacement, competition for land, etc. However, these agreements should complement, but not replace the sustainability system described in the 7 points above.

FOR FURTHER INFORMATION:

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