

Her Excellency the Commissioner for Climate Action
Ms Connie Hedegaard
European Commission
Berlaymont
rue de la Loi, 200
1040 - Bruxelles

Brussels, 8 October 2012

Joint statement on EC proposals to amend Directive 2009/28/EC and Directive 98/70/EC

Distinguished Commissioner,

The European bioenergy industry and RES organisations would like to express their concern regarding draft proposals aiming to amend Directives 2009/28/EC on the promotion of the use of energy from renewable resources and 98/70/EC on fuel quality. Although bioenergy industry recognises the need to address land use issues, these proposals, if adopted, would threaten the future developments of the bioenergy sector including biogas and solid biomass.

They would also put at risk existing business activities and investments which were made based on targets and strategies provided by the RES Directive. Changing these framework conditions only three years after setting them up in the first place would impact investors' confidence and hamper future market developments.

With a joint declaration the signatory associations ask the EU Commission to re-consider the draft proposals and to:

- reject the introduction of ill-designed ILUC-factors based on uncertain models and, in the meantime, rather enforce bilateral agreements between EU and third countries in order to ensure sustainable land use management;
- reject the preferential treatment of residues and wastes by multiplication factors. Instead, research and market development for advanced biofuels should be supported with subsidies and additional sub-targets;
- stick to the decisions and targets set in the RES directive to maintain investors' confidence and Europe's credibility on its climate change and RES policies;
- avoid the creation of double standards, e.g. for biogas as vehicle fuel and biogas for CHP, or wood residues for heat and wood residues for advanced biofuels;

- take better into account the feed by-products of crop based biofuels, producing roughly the same amount of protein per hectare than imported and sometimes questionable soya beans in terms of sustainability.

The European bioenergy business is clearly committed to providing a sustainable biomass supply and has implemented strong, reliable and credible certification schemes which are currently in existence across the territory and have been verified and approved by the European Commission. A spillover effect has been that even non-obliged users of biomass in the food and material use markets adopt the sustainability rules set up for bioenergy on a voluntary basis and therewith contribute to mitigating the risk of ILUC. Without a strong bioenergy market as established today, this would not take place anymore and a chance would be missed to transfer sustainability rules to non-bioenergy sectors.

On behalf of the signatory associations, AEBIOM invites the European Commission to engage in a debate on the best strategies for handling concerns associated with indirect land use changes. Without a more thought-through approach, Europe risks badly damaging Europe's bioenergy industry.

Yours faithfully,



Gustav Melin
President of European Biomass Association



Rainer Hinrichs-Rahlwes
President of European Renewable Energy Council



Arthur Wellinger
President of European Biogas Association



Dörte Fouquet
Secretary General of European Renewable Energy Federation



Heinz Kopetz
President of World Bioenergy Association

Christian Rakos
Chairman of European Pellet Council

cc: All commissioners have received the letter and annex