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Confédération Européenne des Entrepreneurs de Travaux Techniques Agricoles, Ruraux et Forestiers

European Organisation of Agricultural, Rural and Forestry Contractors

Europäischer Zentralverband der Lohnunternehmer

## **Forestry contractors support a national risk based approach in assessing sustainability of production of woody biomass**

**With about 100.000 companies throughout Europe, forestry contractors are major stakeholders in the forest industry supply chain. Present at all stages of the tree cycle, from planting to harvesting, they are strongly supporting efficient and sustainable production and use of wood from Europe's forests. As regards the assessment of sustainable forestry and sustainability of woody biomass, forestry contractors are therefore supporting a risk based approach-at national level.**

The forests in Europe are run for a variety of purposes and put different products on the market. Not the least is the renewable energy market, which future is depending on political decisions to be taken in the coming weeks and months.

A properly designed EU regulation should guarantee the sustainability of woody biomass and, at the same time, allow forest owners to get an additional income. This would help developing activities in the forests, creating workplaces in rural areas and promoting the sustainable management of forests.

### **A national risk-based assessment of the forest's biomass for a sustainable renewable energy**

According to their experiences in different Member States, forestry contractors are convinced that a risk-based assessment of the forest's biomass is key factor for the development of biomass production in the future. Considering the different types of forest, refining processes and production, this assessment should be adapted to national laws and regulations.

One of the roads for a risk-based assessment of the biomass sustainability is through voluntary national systems. One example: Since the beginning of 2016, Denmark has had a voluntary agreement between energy producers and biomass producers to ensure the sustainability of biomass. A national risk assessment has been made in a way which provides all parties with easy access to current legislation, data from national forest monitoring and clear guidelines for objects

where there is a risk of damaging nature in the production of biomass.

It is important for CEETAR, its member organisations and forestry contracting companies that the risk-based system creates as few administrative and financial burdens for forest contractors, forest owners/managers and energy producers as possible. This requires therefore a cooperation between energy producers and biomass producers to find which risk-based solution can be accepted by both parties and does not cause major disadvantages for either one or the other.

One of the ways to limit the administrative burden is to keep the same risk-based system for large uniform areas. It could, for example, be through a national risk assessment carried out by each Member State.

## **No mandatory rules for cascading use of wood**

Moreover forestry contractors do not believe that mandatory cascading will help to ensure the production of high quality products nor be the right way to regulate the use of wood for biomass.

European forestry contractors' view on regulating use of wood (cascading) is that the market itself is finding the balance for the use of wood-based products. It helps to create a competitive wood market that ensures economically optimal utilization of the tree.

Restricting the use of wood for energy will not foster the quality of wood on the market, which is demand driven, but could even disincentive forest owners to perform thinning operations. In addition, the demand for biomass from low-quality products often contributes to financing new operations,

particularly in areas where there is a risk of forest fires.

Instead of looking at mandatory cascading policies should be looking at the origin of biomass. Using local biomass produced in Europe ensures a short transport from forest to energy producer. Local authorities can easily supervise and evaluate whether the production of biomass is sustainable.

Too strong restrictions in the work executed in relation to forest-based biomass will have negative consequences for the forest sector and employment. If it is easier to produce biomass in non EU-countries, imports will increase to the detriment of the European production. Jobs will disappear, important knowledge in biomass production will be lost and it will limit the development in rural areas across Europe.

## **Policy uncertainties are counterproductive**

Should the renewable energy sector develop at the pace needed to reach the target in 2030, there is a need for sudden changes in political support for renewable energy. Biomass for energy production plays an important role throughout the forest sector. Biomass production and use often means long-term investment in the forest sector, it is incredibly important for a forest contractor to have confidence in the political system.

Uncertainty about the marketing of forest wood-based products can hold important investments in the European forest and bioenergy sector, which will jeopardize the forests economy and have negative consequences throughout Europe.

CEETTAR therefore wishes a clear and long-term commitment from the European Union of the role of biomass in future energy supply.

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### Note:

The European Organisation of Agricultural, Rural and Forestry Contractors (CEETTAR), created in 1961, represents 150,000 independent enterprises and 600,000 employees, affiliated to 18 national organisations in 16 Member States. A recognised expert in forestry issues, CEETTAR is member of the civil dialogue group on Forestry & Cork (DG AGRI) and the Expert group on Forest-based Industries and Sectorally Related Issues (DG GROW). At international level, CEETTAR is affiliated to PEFC International & observer in ForestEurope.

Under the Chairmanship of Simo Jaakkola (FIN), vice-president in charge of forestry sector, experts from the member organisations are regularly meeting addressing and designing CEETTAR opinions on topical issues.