

To: Energy and Transport Directorate  
-General, European Commission

From: Swedish Wood-fuel Association.  
Stockholm 2007-06-18

## ANSWER TO THE DG TREN CONSULTATION ON "BIOFUEL ISSUES IN LEGISLATION ON THE PROMOTION OF RENEWABLE ENERGY".

The Swedish Wood-fuel Association here want to communicate only one viewpoint and that is on the issue of system for verifying/confirming that the three suggested environmental sustainability criteria are fulfilled. We suggest that what is described in "box 2", paragraph 2. and 4. is given other contents. Our answer to **Question 1.1** is that we suggest an other kind of system for the verification than the one described in paragraph 2. and 4..

We think that the Commission now has an excellent opportunity to set up a harmonised system for verification already from the start of legislation in this field. We therefore think that the Commission in the first place shall come with a proposal for **a uniform verification system to be introduced in all Member States**. This would be of grate advantage to the common market within EU for sustainable and renewable energy.

Such a uniform system will avoid that different solutions are introduced in different MS with a lot of different authorities and other organisations involved. It will thus avoid competition distortion and it will facilitate the practical job of verification both for producers, market actors and authorities involved in the verification process. The Commission itself will – in cooperation with MS - on one hand have the job of constructing and taking responsibility for such a uniform verification system and on the other hand be released from the job of accreditation and follow up of a lot of different systems. Another advantage of a uniform system constructed for the actual purpose is that it can focus on the adequate criteria without being influenced or biased by other objectives. We think that voluntary market schemes shall not be tied by legislation - one reason being the risk for market distortion.

Given that there is a basic and common structure of verification system within EU, set up by the Commission, it might be a possible solution that a MS chooses to fulfil some part of the common scheme through a specific existing verification system after accreditation by the Commission. We do not advise to open up for such solutions.

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PS: Swedish Wood-fuel Association organises the Swedish wood-fuel producers. The commercial market in Sweden for solid wood-fuel is now over 30 TWh/year corresponding to about 15 million solid cubic metre of wood. The members represent about 75% of the solid wood-fuel sold on the commercial market in Sweden. The member categories are: Private forest owner associations, State forests, Sawmills and there associations, Pulp & paper mills and their forests, Entrepreneurs in forest and waste handling.