



European Commission

Enterprise and Industry  
Directorate-General

# **Sustainability Criteria & Certification Systems for Bioenergy:**

Key issues for consideration according to DG Enterprise  
and Industry

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*Presented by*  
Ingmar Juergens  
DG Enterprise and Industry



# Key Issues

- **DG ENTR supports expansion of sustainability criteria to all biomass for energy** (Art 15.7), respecting the Spring Council 2007 (conditionality of the 10% target)
- **Scope of sustainability scheme:** impacts on other industries, food security
- **Proportionality:** risk of trade barriers and market inclusion
- **Procedural issues:** measuring and certifying

# Scope: Impacts on other Industries

- **Monitoring and analysis needed of effects on certain industries** (e.g. forest-based industries; agricultural and food processing industries) through for example competition for feedstocks
- Article 20 (5c, 5d) obliges the Commission and the Member States to **consider competition for natural resources**, while
- Article 4 underlines, that national policies should **mobilise new biomass resources for different uses**.
- The particular support for biofuels derived from ligno-cellulosic (wood and other, e.g. grasses) material (these count twice against the 10% target) would have **different direct implications for different sectors** (for example food or forest based industries), while indirect implications (through competition for land) might be similar. The further discussion on this will have to be closely scrutinised from an industrial policy and competitiveness perspective.

# Scope: Food Security

- **Food security** is affected by a number of **complex** and interacting factors (diet, population, wealth, weather and climate, ...)
- **Careful monitoring of impacts:** Commission might need a clear commitment to a comprehensive strategy how all major current and possible future bioenergy systems impact on food security
- **Investment security:** the risk of certain biofuel systems causing negative impacts on food security (including through other than price effects) is too high to ignore.  
→ Any serious effects, while **absolutely unacceptable from a humanitarian point of view**, will also **jeopardise the target of the directive as well as investments** that have been made on its basis.
- Define alternative strategy: what if substantial monitoring shows significant negative impacts?

# Procedural Issues: values, definitions

- Default values approach (as used for GHG balances) is straight forward, while leaving scope for improvement to reflect differences in farming systems in different agro-ecological zones → ongoing work at FAO, UNEP, UNIDO, ...
- Consistency of criteria in different contexts
- Use of internationally agreed upon definitions (forest, biodiversity, etc.)

# Procedural Issues: Certification and Proportionality

- **Certification needs to be simple, transparent, cost-efficient, and low-cost**, not excluding certain players (functioning of the certification systems will have to be analysed by the Commission, particularly as regards burden on industry (Article 16(2))).
- **Consider and analyse existing sustainability schemes** (Germany, the Netherlands, United Kingdom, Switzerland, international round tables, ...)
- **Participation in/following relevant international initiatives might be useful** (IEA Bioenergy Task 40, GBEP, FAO BEFS and BIAS, etc.)
- **Development of additional criteria (e.g. social) could be done on a voluntary basis** (compare CDM: Gold Standard, CCBA, etc.). Commission could consider role in the harmonization of these schemes to enable certification and transparency.
- **Need to avoid to systematically exclude certain market players** (for example small farm enterprises that cannot bear the cost of certification)



# Summary

- DG ENTR will support and contribute to the work on the sustainability of biofuels and biomass for energy
- Impacts on other industries and on food security need to be monitored and analysed
- Risk of trade barriers that might drive up prices
- Procedures should be simple, transparent, cost-efficient, and low-cost, and build on existing work.

Contact: [Ingmar.Juergens@ec.europa.eu](mailto:Ingmar.Juergens@ec.europa.eu) (DG Enterprise and Industry)