



**Questionnaire Review Regarding GHG
Emissions Calculation & SFM Certification**

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I. Response Summary

	<u>Number of stakeholders</u>	<u>Number of respondents</u>
Belgium		
Policy makers	2	2
Denmark		
Policy makers	1	1
Industry	3	3
The Netherlands		
Policy makers	3	2
Industry	3	3
The United Kingdom		
Policy maker	1	0
Industry	2	2
Others (stakeholders from Italy, USA, Norway)	3	1
Total	18	14



II. GHG Emissions Calculation (1)

Issues	Response
1. Methodological approach	<ul style="list-style-type: none"> - <i>UK has two methodological changes leading to change in calculations</i> - <i>Belgian methodologies are considered acceptable to meet the country's policy objectives (net amount of support to be paid for)</i> - <i>A harmonised one, prefer at EU/international level & based on BioGrace framework</i>
2. Feedstock material	<ul style="list-style-type: none"> - <i>Harmonised definition of feedstock material at EU level</i> - <i>Generators have information of material in the whole supply chain</i>
3. Typical & default values	<p><i>Should be set by EU & JRC but in consultation with MSs that have sus. criteria</i></p>
4. Collection, energy & carbon data for calculations	
4.1 Emissions levels	<ul style="list-style-type: none"> - <i>Thresholds/targets in MSs are doable but single reference is better</i> - <i>Comparators should be specific according to different purposes</i>



II. GHG Emissions Calculation (2)

Issues	Response
4. Collection, energy & carbon data for calculations	
4.2 Mass balance approach	<ul style="list-style-type: none"> - <i>Applicable & reflects industry practice in FSC/PEFC</i> - <i>Feasible as demonstrate sustainability through certification of pellet mill</i> - <i>Relevant as long as the national sustainability requirements are met</i>
4.3 Recommended minimum GHG savings	<ul style="list-style-type: none"> - <i>Follow EU recommendation</i>
4.4 Default values	<ul style="list-style-type: none"> - <i>Too much details/info may make calculations more complicated</i> - <i>JRC should make consultation to gather realistic data</i>
4.5 Chain-specific data for each shipment of solid biomass	<ul style="list-style-type: none"> - <i>As a few number of parameters have high impacts (e.g. boiler fuel) on GHG savings of biomass -) focus on the main ones</i>



III. SFM Certification (1)

Issues	Response
1. Legislation update	<ul style="list-style-type: none"> - Level of certification is of high concern - Further discussions are on-going in the UK, BE (Wallonia), DK and NL - Consultation with international initiatives (SBP, PEFC, FSC)
2. Demonstration of sustainability	
2.1 Legality	<ul style="list-style-type: none"> - Some MSs have their own Timber Procurement Policy in consultation with policies of neighboring countries <ul style="list-style-type: none"> - Forest certification followed by CoC - Product certification supported by CoC
2.2 Level of certification	Pellet mill level is more practical/workable
2.3 Minimum certified forest site size	<ul style="list-style-type: none"> - Vary by countries - Regional risk assessment should be considered instead of forest size
2.4 Preferred certification systems	<ul style="list-style-type: none"> - Each scheme developed for specific purposes & specific markets <ul style="list-style-type: none"> - Opinions vary



III. SFM Certification (2)

Issues	Response
2. Demonstration of sustainability	
2.5 Percentage of SFM certified biomass	<ul style="list-style-type: none">- Bioenergy sector is a minor player in the forest market- 100% legal with 70% certified min + 30% max controlled wood (or equivalent) would be feasible- Non SFM certified material should demonstrate sustainability<ul style="list-style-type: none">- Prefer no change over time
2.6 Chain of Custody	<i>FSC and PEFC already offer Mass Balance so those systems exist & work well</i>
2.7 Should SFM systems include a GHG footprint by default	<ul style="list-style-type: none">- Currently, no consensus on science & methodologies- GHG can be done by complementary systems such as SBP



IV. Other Sustainability Criteria (1)

Issues	Response
1. Carbon debt	
1.1 Relation between GHG balance and carbon debt	<ul style="list-style-type: none">- <i>Carbon debt should not be included as long as there are currently no uniform accepted methods</i>- <i>The Dutch have proposed a positive and negative list that is drawn up to prevent unwanted long C-debt. That is considered more practical to work with in the market.</i>
1.2. Is risk of carbon debt could also be assessed on a case-by-case basis?	<ul style="list-style-type: none">- <i>The bioenergy industry uses the low quality material left unutilized by the major operators in the forest-timber/paper/pulp -) carbon debt should not be a big issue</i>- <i>Whether the necessary data can be collected by a pellet mill to implement this criterion –need to be tested</i>



IV. Other Sustainability Criteria (2)

Issues	Response
2. Indirect effects of biomass production	
2.1 Competition with other uses of wood	<ul style="list-style-type: none">- <i>Risk is low since the industry only utilizes the lowest quality / priced wood (a high number of reports indicate that more wood is growing than is used)</i>
2.2 Indirect land-use change	<ul style="list-style-type: none">- <i>ILUC is not a big issue for bioenergy since the probability of forest remaining as a forest is high</i>- <i>Environmental and social impacts of ILUC vary widely according to the specific circumstances in which biomass is produced</i>- <i>Addressing ILUC might be relevant in the long term</i>



Thank you for your attention!

More information?

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