

Bioenergy and the EU LULUCF regulation

Woody Biomass – Climate Workshop, 15th April 2021

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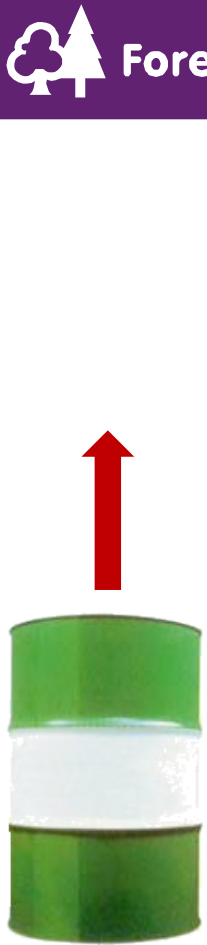
Why?

What causes emissions in a given year?

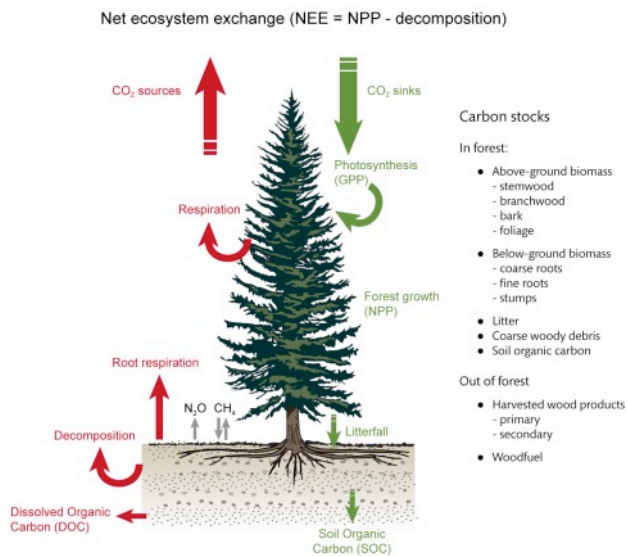
- Current direct consumption (combustion) of fuel in year
- Supply chain emissions/losses.

What needs to be done to claim emissions reductions?

- **Change** (current) consumption in a year
 - (compared to previous years)
 - (reduce supply chain emissions/losses)

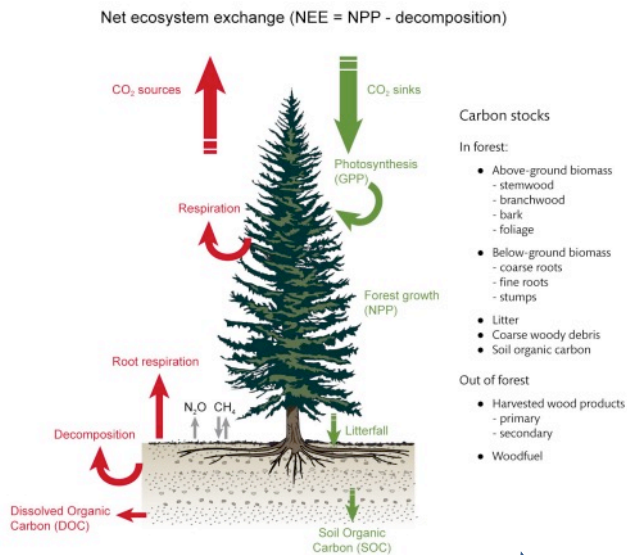


What causes emissions/removals in a given year?



- Natural photosynthesis and respiration/climate
- Natural disturbances
- Climate
- Historical management
- **Current management** in year (including harvesting for bioenergy).

What needs to be done to claim emissions reductions/increased removals?



- Natural photosynthesis and respiration/climate
- Natural disturbances
- Climate
- Historical management
- **Change (current) management in year.**

How do we separate this effect out from all the others?

How?



- Simple accounting of removals/emissions for afforested land and deforested land
- “Afforested land” = “Land to Forest Land” in GHG inventories
- “20 year transition period”
- Similar approach for “deforested land”
- “Managed forest land” = “Forest remaining Forest” in GHG inventories
- FRL accounting for managed forest land.

“The [FRL] shall be based on the continuation of sustainable forest management practice, as documented between 2000-2009 with regard to dynamic age related forests characteristics in national forests, using the best available data”.

“[FRLs] shall [...] not unduly constrain the forest management intensity as core element of sustainable forest management practice, with the aim of maintaining or strengthening long-term carbon sinks”.

“...a constant ratio between solid and energy use of forest biomass as documented in the period from 2000 to 2009”.”.



Does it work?

Underlying principles/aims

- Level playing field with other sectors
- Incentivise mitigation activities
- Avoid possibilities for gaming/hot air
- Foundation in data/evidence.

Design

- Stringent target (accounted LULUCF emissions must not exceed removals).

Implementation

- Supporting guidance
- External expert review process.

Design

1. FRL accounting: rates of forest harvesting (and bioenergy supply) can increase whilst still accounting for net removals or avoiding accounted emissions
2. In combination with (1) the “constant ratio between solid and energy use” can lead to increased bioenergy use without accounting for all emissions
3. Limited incentives for afforestation activities.

Implementation

1. Reliance on models: complicated and obstacle to consistency, transparency and verifiability
2. Limitations in data sources (forest inventories, management practices/wood production statistics) likely to lead to inconsistent construction of FRLs.

Design

1. Scope: EU Member States only (no relevance for imported biomass sources).

Rationale

1. Lack of direct influence over actors: signals sent to biomass consumers by RED II and ETS are not consistent with the implications of the LULUCF Regulation (see (2))
2. Influencing national policies/actions: it is up to Member States to understand Regulation, what is needed to comply, what actions to take, and how to implement them.



Room for
improvement?

Incremental changes

- Simplify definition of “current forest management practice” e.g. recent rate of wood production?
- Simplify energy:solid ratio, e.g. recent level of consumption for energy?

Strengthen flanking policies

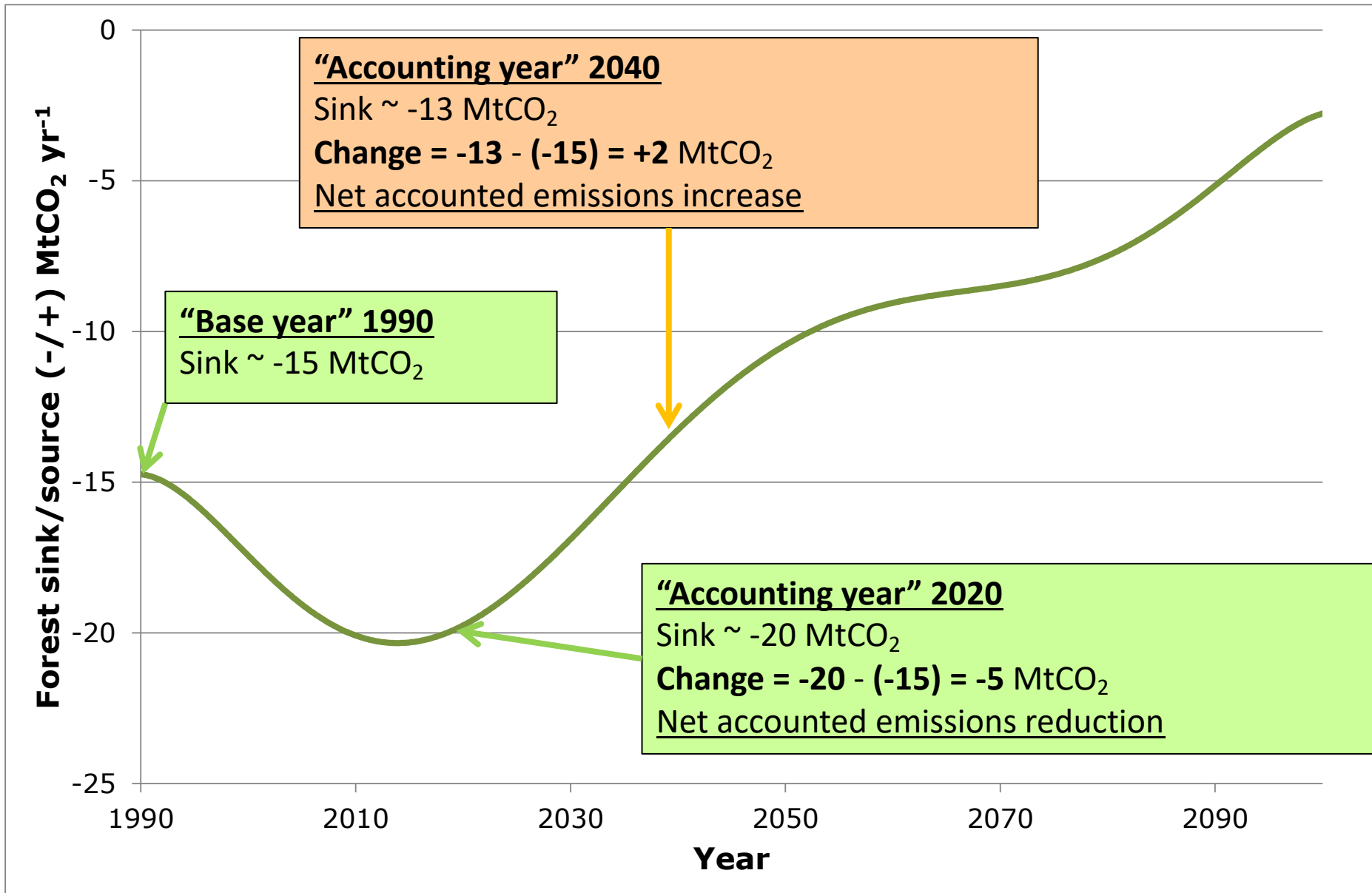
- Stronger sustainability criteria in RED II?

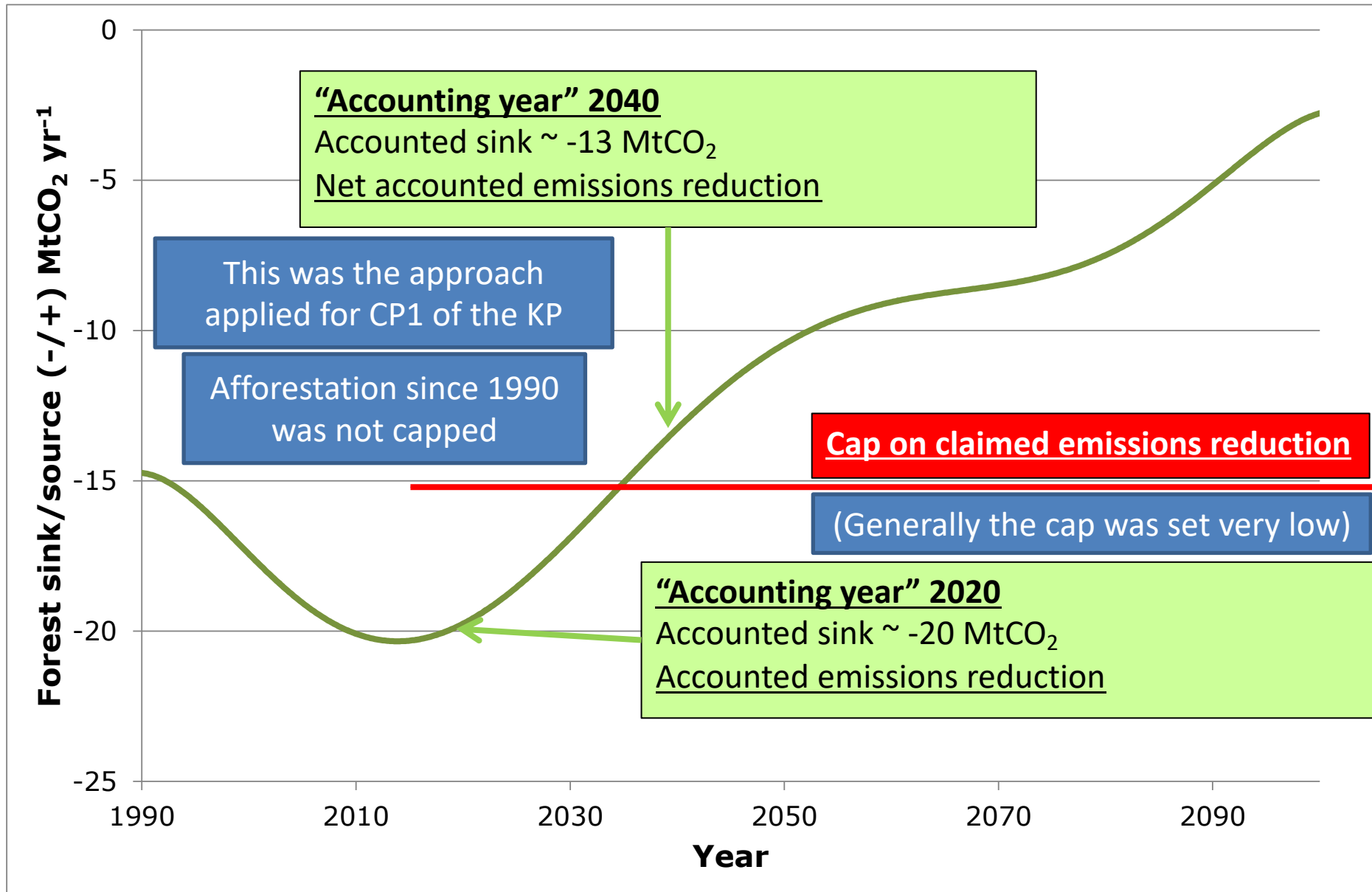
Back to the drawing board...?

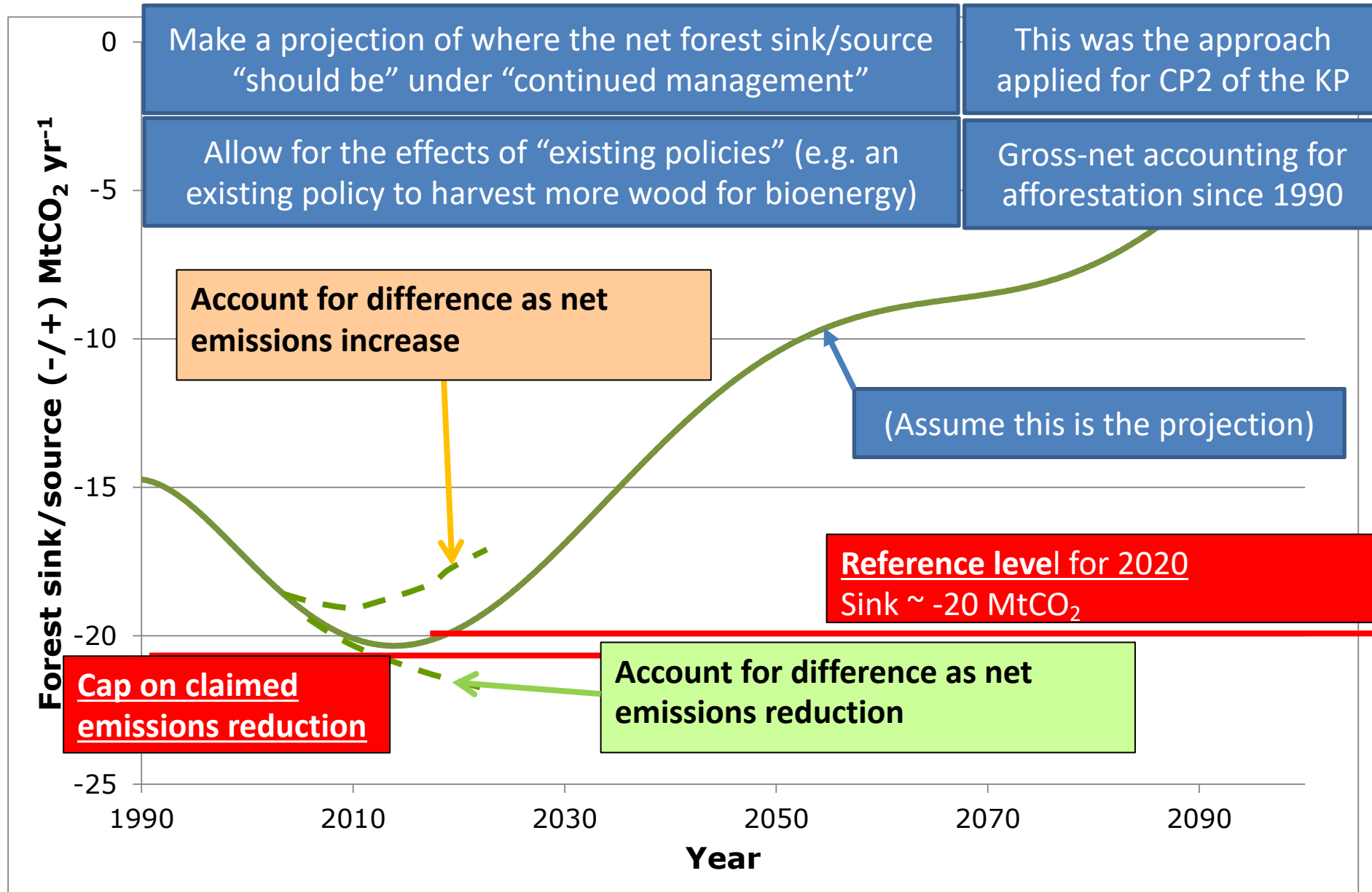


Thank you

Background (some
history about
forestry accounting)







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