



Mr. Philip Lowe
Director General DG Energy
DG Energy
European Commission
B-1049 Brussels

3 March 2010

Dear Director General,

Dear Philip,

The report the European Commission presented last week on sustainability requirements for the use of solid biomass does not go far enough for European business.

European Commission should propose harmonised and binding sustainability criteria for the use of solid and gaseous biomass. Harmonised sustainability criteria are useful to ensure that biomass is environmentally, economically and socially sustainable.

These criteria should be equivalent to the sustainability criteria for biofuels. Any proposal for solid and gaseous biomass sustainability criteria should be developed in an open and consultative process with the interested parties such as biomass producers and users, energy companies, etc. The current absence of European criteria creates uncertainty, may have a negative impact on investment decisions and lead to different national sustainability criteria.

A significant part of the EU's 20% renewable energy target is projected to be reached through the use of biomass. But biomass can only be considered "renewable" if its use and its production do not have negative economic, social and environmental impacts. At the same time the availability of biomass for use as industrial raw material must be safeguarded through the establishment of a level playing field. Any biomass use should therefore be covered by minimum sustainability criteria in order to ensure the most effective and efficient use of biomass. Particularly if its use is stimulated by support schemes, criteria have to be in place to avoid incentives to use biomass inefficiently and unsustainably. Harmonised criteria will also help preventing that biomass is transported to areas within the EU where the sustainability criteria are the weakest and will contribute to creating an internal market for biomass within the EU.

Yours sincerely,

best regards

Philippe de Buck

Philippe de Buck