



EU Renewable Energy Directive 2008 summary of WWF position

Introduction

In December 2008 the EU agreed on the Renewable Energy Directive¹. The Directive establishes an overall EU target of 20% renewable energy to be used in electricity generation, heating and cooling and a target for individual Member States to deliver 10% renewable energy in transport. The transport energy target has generally been referred to as the “biofuel target” mainly because it was expected that a significant share or all of it would be met by biofuels.

As a result of the growing evidence on the potential impacts of large scale bioenergy development and the concern voiced by numerous stakeholders, the Directive establishes minimum sustainability criteria for bioenergy production and consumption and makes the 10% dependent on sustainably available supply. As a result of WWF’s consistent lobbying in Brussels and in several Member States the Directive evolved in many areas and to a degree addresses almost all of the issues of concern raised by us.

However the final outcome is a mix of good and bad outcomes and much work is still needed.

Summary of the main positive and negative outcomes:

1. 10% renewable energy in transport target

The concern was that a 10% target met by current biofuels from agricultural crops alone would drive unacceptable levels of land use change for feedstock production as well as increased food prices.

There is clear support, in the Directive, for the use of a mix of renewable sources to meet the 10% target. Extra weighting is given to electricity, wastes and second generation biofuels, rather than just first generation biofuels from agricultural commodities.

However, it is unclear how the contribution of electricity to transport will be calculated making it difficult to see what impact on emissions savings it would have.

2. Sustainability standards

The concern was that the original sustainability standards proposed, whilst at least mandatory, did not address all the likely impacts.

The Directive includes a definition of land which cannot be used to grow biofuels (“no-go areas”) based on biodiversity values and carbon storage criteria. There will also be extra support for biofuels with potentially lower environmental impacts such as those produced on degraded land, from wastes and agricultural co-products.

However, the assessment of compliance with the biodiversity “no-go” requirements is done ex-post – once the damage has been done; the High Conservation Value framework has not been included as the tool to assess biodiversity value so there is the risk that some areas important to wildlife may still be lost; the definitions of forest used in the text are in some cases contradictory; and the Directive allows the conversion of degraded forests if the GHG criteria is fulfilled. Also the Directive only requires

¹ Full text of the EU RES Directive: http://ec.europa.eu/energy/climate_actions/doc/2008_res_directive_en.pdf

reporting (instead of legally binding requirements) on air, soil, water protection issues and there are no mandatory social standards.

3. Minimum GHG standards

The concern was that the proposed minimum GHG standards were too low to ensure significant overall GHG savings.

The Directive does set slightly higher mandatory minimum GHG standards that biofuels must achieve and these are raised over time:

- 35% from 2009,
- 50% in 2017 for existing installations and 60% for new installations

However, for current installations the GHG targets become legally binding only after 2013; incentives and/or support for biofuels are not linked to GHG or environmental performance; the decision making process in the EC for setting the default GHG values has not been transparent and has favoured EU feedstocks over imports.

4. Support for independent standards

The original proposal was for the EU to establish its own system of standards for biofuels. WWF was keen for the EU to build on the best of existing standards like the RSPO.

The meta-standard concept is included and companies will be able to use credible standards to prove compliance with the RED.

However, it is unclear how stakeholders will be involved in the benchmarking of independent standards and there are concerns about the credibility and transparency of bilateral and international agreements that the EU will be able to make with producer regions that could be used to prove compliance. In addition there is a concern that for EU feedstocks cross-compliance is assumed to meet the sustainability standards.

5. Reporting requirements

Given that the mandatory standards do not cover all of the issues of concern it is important that reporting requirements on companies and Member States picked up non-mandatory issues adequately.

Companies will have to report on what they are doing on:

- Soil, water and air protection,
- Restoring degraded land,
- Avoiding water consumption in dry areas; and
- Measures taken to address social impacts.

Member States and the **EC** will have to report on progress and impacts of the EU RED.

However, a lot of the fine detail of the reporting schemes needs to be finalised still and it is unclear how frequent the company reports will be or whether they will be made public.

For further information, please contact:

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