

Compliance Conference 7.- 8. November 2017



Renewable Energy Directive (RED)

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Issues of ETS interest

Extension of sustainability criteria to biomass fuels

- Current RED scope: bioliquids and biofuels
- Definition in Art. 2 (pp) RED → Extension to biomass fuels:
„*biomass fuels means gaseous and solid fuels produced from biomass*”

Term „installation“ and thresholds (Art. 26 (1) RED)

- Missing definition of „installation“ (what is meant? → whole installation or part of an installation like a boiler?)
- Missing reference for the thresholds (MW total rated thermal input) mentioned in Art. 26 (1) RED

Biomass fuels shall have to fulfil the sustainability and greenhouse gas emissions saving criteria set out in paragraphs 2 to 7 only if used in installations [...] with a total rated thermal input equal to or exceeding 20 MW in case of solid biomass fuels and with an total rated thermal input equal to or exceeding 2 MW in case of gaseous biomass fuels. [...]

- ➔ Could lead to complicated scope discussions with operators
- ➔ How to deal with installations (industry activities) which do not have “total rated thermal input” as a threshold in Annex I ETD (e.g. cement)?

Evidence for GHG savings (Art. 26 (7) d) RED)

- Requirement for GHG saving evidence for solid and gaseous biomass is dependent on the date when the installation is starting its operation

"The greenhouse gas emission saving from the use of biofuels, bioliquids and biomass fuels taken into account for the purposes referred to in paragraph 1 shall be: [...] at least x% for electricity, heating and cooling production from biomass fuels used in installations starting operation after 1 January 2021 [...]"

- The age of the plant using solid or gaseous biomass is not related to the sustainability of biomass fuels

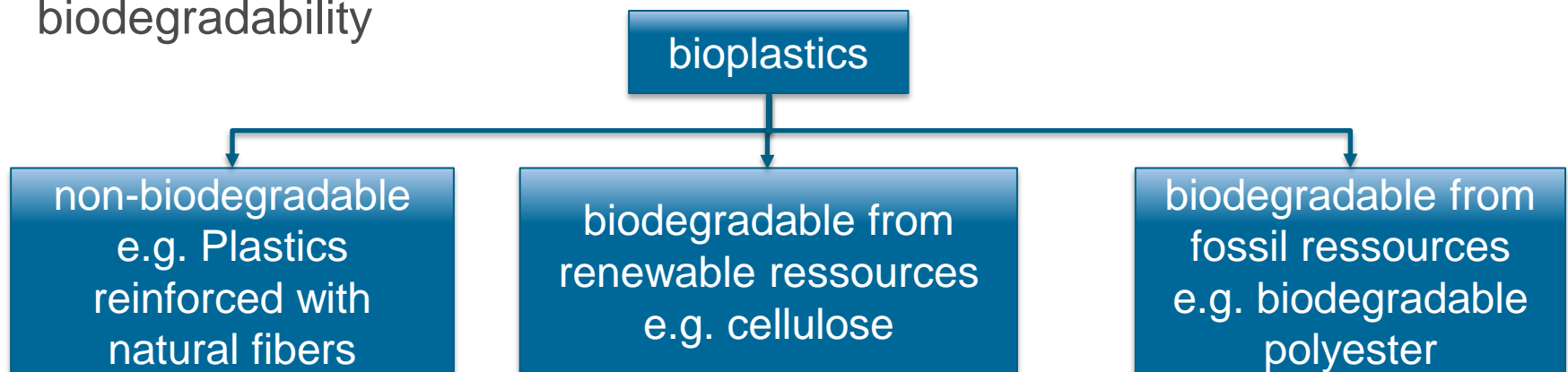
- ➔ Wouldn't it be more reasonable if the criterion in Article 26 (7) (d) relates to the date when the biomass is used?

(e.g. *"At least x% for electricity, heating and cooling production **from biomass fuels used** after 1 January 2021 and x% for electricity, heating and cooling production **from biomass fuels used** after 1 January 2026."*)

Definition of biomass (Art. 2c RED)

‘biomass’ means the biodegradable fraction of products, waste and residues from biological origin from agriculture, including vegetal and animal substances, forestry and related industries including fisheries and aquaculture, as well as the biodegradable fraction of waste, including industrial and municipal waste of biological origin

- “biodegradable”: no 1:1 relationship between biomass and degree of biodegradability



➔ What is the crucial criterion for a source stream to be classified as biomass?

Thank you for your attention!

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