BIOGRACE

Harmonised Calculations of Biofuel Greenhouse Gas Emissions in Europe

2012 03-30

BioGrace Deliverable 5.2

Report on contacting policy makers

By the partner Swedish Energy Agency (STEM)

with support from the WP5 participants

Supported by INTELLIGENT ENERGY EUROPE

www.biograce.net

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Summary

Since standard values to be used in GHG calculations are not included in the Renewable Energy Directive, GHG calculations performed for the same biofuel can lead to different results, as a consequence of the use of different standard values.

Moreover, economic operators are able to choose the most beneficial values and, in that way, enhance the GHG performance of their biofuels, without actually improving this performance. Therefore, a list of standard values has been developed by the BioGrace project[1].

The policy makers who participated to the workshops and who were reached by other ways, e.g. visits, agreed that this is a problem, although few thought that including a list in the national legislation is the right way to solve the problem.

By March 2012 seven (7) MS have included the BioGrace standard values into Technical Guidances or have made reference to these standard values from their legislation: 1) Czech Repubic, 2) Denmark, 3) the Netherlands, 4) Romania, 5) Slovakia, 6) Spain and 7) UK.

Introduction

BioGrace project goals and aims in brief

The main objective of the BioGrace project is to harmonise Green House Gas (GHG) calculations as performed under Renewable Energy Directive (RED)[2] and Fuel Quality Directive (FQD)[3] directives. Harmonisation is only possible when the same set of standard values (such as emission coefficients and lower heating values) is used. The BioGrace project has made a list of standard values that were used in the calculations that led to the RED standard values because the Commission will not publish such a list (although the Commission does refer to the BioGrace list from its webpage on sustainability criteria[4]). The BioGrace project is requesting all 27 Member States to include reference to the list of standard values from their legislation or from Technical Guidelines as part of their legislation.

Description of the Task 5.2 and its goals

The main goals of the WP5 Task 5.2 are the following:

- To identify the MS policy makers who are responsible of the sustainability criteria implementation.
- To get in contact with these policy makers and send them information about the BioGrace project goals and aims.

[1] http://www.Biograce.net/
[2] 2009/28/EC
[3] 2009/30/EC
[4] http://ec.europa.eu/energy/renewables/biofuels/sustainability_criteria_en.htm

- To gather information about the implementation status of the RED and the sustainability criteria for liquid biofuels and certain bioliquids.

This report describes the main activities within the task and also the progress concerning at the MS level.

How the task was performed

The Task 5.2 was led by the partner Swedish Energy Agency (STEM)[5]. All the other partners have given input. The policy makers were contacted by the project partners by telephone, email or by ordinary mail. This information was forwarded to partner STEM.

All contacted policy makers have got a letter about the BioGrace project aims, goals and other relevant information about the project.

Several workshops in different MS were carried out by the BioGrace partners to involve policy makers. The aim of these actions was to involve policy makers and enhance the BioGrace project partners contact networks.

In addition, all partners used their existing contact networks to get in contact with MS policy makers. EU projects and networks such as CA-RES[6], REFUREC[7] and BioenergyPromotion[8] are used as contact points. In addition information about the BioGrace project was also distributed to IEA task 38 members[9].

[5] http://www.swedishenergyagency.se
[6] http://www.ca-res.eu/
[7] http://www.refurec.org/
[8] http://www.bioenergypromotion.net/
[9] http://www.ieabioenergy-task38.org/

Workshops

The following workshops aimed for MS policy makers were carried out:

- 29 June 2010 in Utrecht, the Netherlands: A first workshop was held in Utrecht in the Netherlands for policy makers from the countries of the project partner organisations. This workshop focused on the implementation aspects of the list of standard conversion values and the linkage to national legislation.

- 23 September 2010 in Heidelberg, Germany: This workshop was aimed for policy makers and greenhouse gas experts. The workshop focused on methodological issues in the course of implementing harmonised GHG calculation tools.

- 12 November 2010 in Stockholm, Sweden: A workshop was organised for policy makers in Stockholm including experts that advise them. The aim of this workshop was to inform policy makers on the products of the project and receive feedback on the Excel GHG calculations and the user-friendly GHG calculators for optimisation.

- 25 November 2010 in Athens, Greece: Another policy makers' workshop was organised in Athens/Greece equal to that in Sweden.

Totally 21 policy makers were reached by this way. More information about these workshops could be found on the BioGrace project web-site[10].

Visits

Several visit to MS policy makers were carried out by the project partners and the project coordinator. The aim of these visits was to get information from the certain MS policy makers about implementation of the sustainability criteria for liquid biofuels and certain bioliquids. The other aim was to give policy makers information about the latest findings from the BioGrace project and to ask the policy maker to consider making reference to the BioGrace standard values from legislation and/or technical guidances to legislation.

Policy makers from the following member states were contacted by this way:

- Slovakia, 16th February 2011
- Italy, 1 st April 2011
- Latvia, 30th June 2011
- Estonia, 1st July 2011
- Luxemburg, 20th October 2011
- Czech Republic, 3rd November 2011

[10] http://www.BioGrace.net/content/workshops/workshopoverview

Results

Since standard values to be used in GHG calculations are not included in the Renewable Energy Directive, GHG calculations performed for the same biofuel lead to different results, as a consequence of the use of different standard values.

Moreover, economic operators are able to choose the most beneficial values and, in that way, enhance the GHG performance of their biofuels, without actually improving this performance. Therefore, a list of standard values is being developed by the BioGrace project.

The policy makers who participated to the workshops and who were reached by other ways, e.g. visits agreed that this is a problem, although few thought that including a list in legislation is the right way to solve the problem.

Commitments and or references made

By March 2012 seven (7) MS have included the BioGrace standard values into Technical Guidances or have made reference to these standard values from their legislation: 1) Czech Republic, 2) Denmark, 3) the Netherlands, 4) Romania, 5) Slovakia, 6) Spain and 7) UK.

The table 1 show a brief overview of how MS are going to act concerning this commitment and / or reference. Moreover, 4-9 member states are preparing to include this reference on the short term, these examples will be added as soon as they have been made.

Table 2. Overview of the progress.

Committed to make reference	**Number**	**Country**
- and have done so	7	Czech Republic, Denmark, Netherlands, Romania, Slovakia, Spain, UK
- and are planning to do so	5	Austria, Bulgaria, Germany, Ireland, Portugal,
Reached plus requested, but no commitment (yet)	8	Cyprus, Estonia, France, Hungary, Italy, Lithuania, Malta, Poland
Reached but not yet requested	0	
Reached but are not going to make a reference	7	Belgium, Finland, Greece, Latvia, Luxemburg, Slovenia, Sweden
Total	**27**	

In Germany the "BLE Guidance for implementing the German Ordinances according to RED" will be updated and will adopt the BioGrace standard values. In Ireland, reference to the BioGrace standard values will be made from a technical specification that is to be written by NORA (National Oil Reserves Agency).

Lessons learned

Concerning the BioGrace project WP5 task 5.2 aims and goals it has been difficult to engage and contact relevant MS policy makers. There are several reasons to that, ie. it was difficult to get information of the policy makers who were directly involved (i.e. are responsible of the action / are able to make decisions about it) in the RED related activities incl. the sustainability criteria. Therefore, some effort was allocated to locate the actual / relevant policy makers.

The most difficult task due to the project plan has been to convince the relevant policy makers to make a reference. It was perhaps a miscalculation to suppose that one project could influence policy making at MS level in all 27 member states and in a rather short notice. In many MS countries authorities work is not public and the officials do not want to talk too much about the issues with people outside the authority frame. Projects like the CA-RES could be very useful, but the problem is that the project information is "classified".

It should also be pointed out that generally the legislative texts make only reference to official standards, regulations, legislation from national or European or international level. As the BioGrace list of standard values has not this status, it was probably a reason to explain the low number of references made to this document from legislation, and member states preferring to make reference from explanatory text in the legislation published in official journals, or from technical guidances to legislation.

A last point of attention, that became clear in the course of the project, is that the European Commission can also recognise GHG calculation tools as voluntary sustainability schemes, and in fact is doing so. When the BioGrace project partners learned that this is possible, the BioGrace GHG calculation tool was send in to the Commission with the request to accept is as a voluntary scheme. However, also other tools can be sent in. This has undermined the attempts of BioGrace to harmonise the standard values, because (i) there is no guarantee that these other tools contain the same standard values or that the European Commission will cause that several tools that are send in contain the same standard values; and (ii) policy makers from EU member states recognise this and are therefore reluctant to make reference to BioGrace. Policy makers from Luxembourg openly answered to BioGrace project partners that this is the reason that they will not make reference to the BioGrace standard values; they do not want to exclude non-BioGrace systems.

During the execution of the BioGrace project a number of policy makers and scheme owners of voluntary sustainability schemes indicated that the only way to reach harmonisation would be that the Commission decides that a certain set of standard values should be used. This should at least be done for the main values that determine 90% or more of the outcome of the GHG calculations. During the Ispra workshop on GHG calculations organised by JRC[11] in Nov. 2011, the BioGrace project coordinator explained this issue and requested the EC policy maker from

[11] Joint Research Centre, http://ec.europa.eu/dgs/jrc/index.cfm

Directorate-General for Energy (DG ENER)[12] present to consider including a short list of the most important standard values in the RED. This can possibly be done during the upcoming amendment of RED Annex V. The project coordinator sent some additional information on this to DG ENER. At the moment of writing this report it is not clear whether DG ENER is considering this option.

Conclusion

Although, the aim of task 5.2 was not fully achieved, the activities performed led to a better understanding of the project as a whole amongst the contacted and participating MS policy makers. Policy makers from all 27 EU member states know about, and in many cases are familiar with, the BioGrace GHG calculation tool and the BioGrace standard values.

[12] http://ec.europa.eu/dgs/energy/index_en.htm