

Region Örebro County's view on the proposal for a regulation on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework (COM/2016/479/FINAL)

This paper explains the view of Region Örebro County on the European Commission's proposal for a regulation on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework (COM/2016/479/FINAL).

General opinion

Clean energy transition and climate change mitigation are issues of the utmost priority in Region Örebro County. The region's stipulated climate and energy goal is that Örebro shall be a county without net emissions of greenhouse gases to the atmosphere in 2045. Therefore, Region Örebro County welcomes the European Commission's proposal for a regulation due to the importance of an EU governance framework for emissions and uptake from land use, land use change, and forestry (LULUCF) after the end of the second commitment period of the Kyoto Protocol in 2020.

However, the current proposal contains elements that potentially could inhibit necessary development on how to address mitigation of climate change. This would endanger the development of solutions that would contribute to the fulfillment of the goals set in the EU's 2030 climate and energy framework. Region Örebro County

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wants to point out that the provisions formulated in Article 8, regarding forest reference levels, risk limiting progress and advances of great potential in the bioeconomy. This would mean that conditions deteriorate for the Swedish forestry sector and consequently also the use of biomass for heating and for combined heat and power technologies (CHP). It is a fact that the ratio between forest growth and the amount of harvested wood is continuously growing, and only 75 percent of the growth is harvested. Forest management in the Nordic countries is subsequently characterized by long-term sustainability. In contrast, the proposed method of determining forest reference levels could lead to an underutilization of forest resources which would complicate the transition to a sustainable and fossil free society.

Concerns regarding the method of determining forest reference levels

Article 8 of the proposal states that Member States' national forestry accounting plans shall include a proposed new forest reference level based on the continuation of current forest management practice and intensity, as documented between 1990-2009. Region Örebro County's concern is that this approach only takes into consideration the forest management between 1990-2009. With this as a basis for determination of forest reference levels, there is a risk that the reference levels will not appropriately reflect the actual development of the ratio between forest growth and harvest volumes. In Sweden, this ratio has been growing throughout the 20th and the 21st centuries. According to forest management projections until 2030 made by the Swedish Forest Agency, this trend will continue. In other words, when only 75 percent of the growth is harvested yearly, the total forest volume in Sweden is growing. This also means that the carbon uptake in the land use sector is high and has increased by 40 percent since 1990. Consequently, Region Örebro County wants to stress that the method of determining forest reference levels needs to reflect and take into account the actual development and relationship between forest growth and harvesting volumes. If this is not the case, there is a risk that these reference levels put an indirect restraint on the development of the bioeconomy and the forest industries.

Sustainable forest management and the importance of the bioeconomy

The aim of the forest management in Sweden and the other Nordic countries is to be sustainable in the long-term. This is reflected in, inter alia, how forest biomass for bioenergy is produced, which comes from forest residues like twigs and branches. The Swedish Forest Agency recommends that 20 percent of forest residues should be left at the harvesting site in order to ensure a long-term nutritional balance in the ground and to maintain biodiversity. Sweden has the highest share of renewable energy in the energy mix within the EU (54 percent). Here, bioenergy is the largest contributor and accounts for 70 percent of the renewable energy, of which solid biofuels, i.e. forest residue, are the most common source.

The forest-based bioeconomy holds great potential for development in many sectors of the economy, e.g. in the construction sector, the chemical industries, the biofuels sector, and in the textiles industries. Here, Region Örebro County wants to emphasize that a strong bioeconomy leads to less dependency on fossil fuels. This enables a necessary and faster transition to a sustainable, climate-friendly, and fossil free society while at the same time unlocking a potential for economic growth in the EU.

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