



# Experiences with the implementation of sustainability criteria in the field

## - recommendation for policy decision makers

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# 1,5 year experience with sustainability certification



- + broad acceptance of REDcert system
- + operational mass balancing almost integrated in daily business processes
- + in general positive result of neutral inspections
- Partly difficulty to demonstrate the status of crop land as of 1st January 2008
- Structural influence of operators due to certification cost
- ! Validation of formal proofs of sustainability
- ! Quite different GAP requirements between European and other certification schemes

# Participants in the REDcert system (as of 31.12.2011)



Total registrations	1.065
Contractors	1.022
- Thereof in EC member states	132
<b>Type of operations</b> (multiple counting)	
Gathering Points*/**	827
Oil mill*/**	120
Sugar plant	11
Biofuel producer (incl. Ethanol)**	40
Supplier / Trader (solid+liquid bm)	21
other	14

**approx. 2.350  
operating sites**

**Certification bodies: 21**

**Certificates: 916**

Growing number of  
biomethane producers

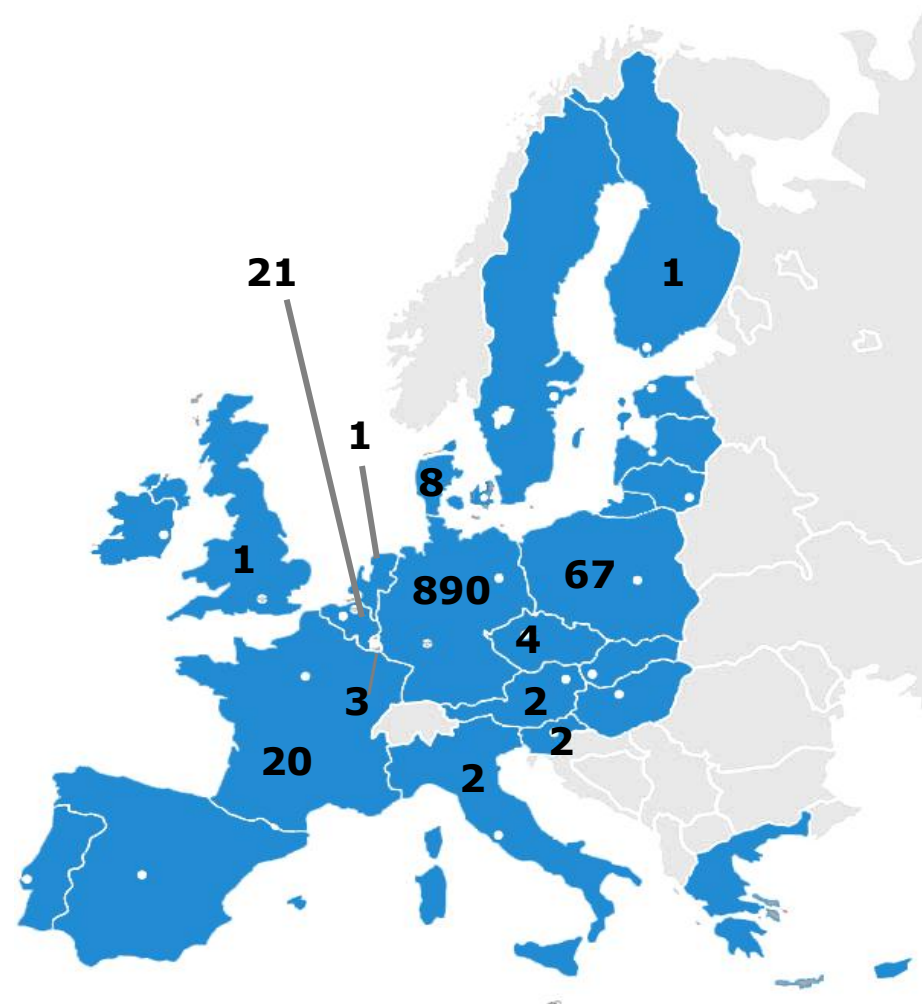
\* Thereof 33 companies registered as „smallest“ and 55 as „small“ company

\*\* Thereof 162 companies with an additional registration for the NABISY application

# Participants in EC member states (as of 31.12.2011)



- Belgium
- Denmark
- Germany
- Finland
- France
- Italy
- Luxembourg
- The Netherlands
- Austria
- Poland
- Slovenia
- Czech Republic
- United Kingdom



# Challenge “mass balancing”



- Mass balancing has been almost integrated in daily business processes
- Up-to-date warehouse and stock managements applications support identification, registration and balancing of sustainable biomass/biofuel quantities.
- Simplification of administrative work by extension of balancing period (up to 12 month until 30<sup>th</sup> June 2012)

# Statistic of neutral inspections

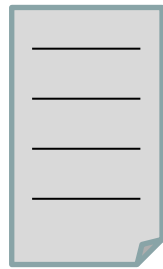


CB inspections carried out until 31<sup>st</sup> December 2011

	<b>total</b>	<b>thereof k.o.</b>	<b>in %</b>
<b>operator</b> (first gathering points, biofuel producer, supplier)	<b>2.574</b>	11	0,4
<b>farmer</b>	<b>&gt;4.500</b>	31	~0,7

# Status of cropland

Usual and simple way of verification:



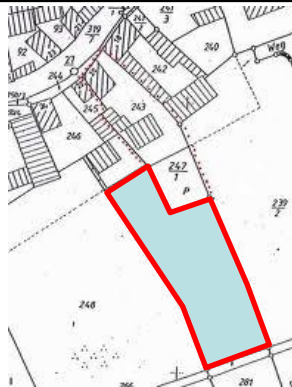
Official inventory list as of January 1<sup>st</sup> 2008 of cropland used and confirmed in the frame of Council Regulation (EC) No 73/2009 establishing common rules for direct support schemes for farmers

Simple access  
↑

Potential access  
↘

Direct access unlikely  
- - -

Owner/Farmer 1



Sale →

Owner/Farmer 2



Sale +  
combination →

Owner/Farmer n



# Structural impact



small ← Structural variety of operators → large  
farm based industrial



**Smaller operators decided to give up or even to reject a sustainability certification due to the costs of certification !**

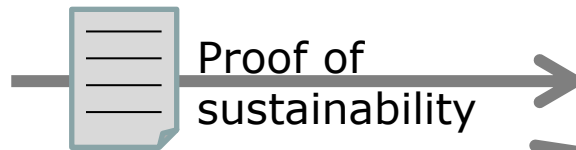
- Parts of potential feedstock/biomass resources remain unexplored
- Contradiction with certain support programs for de-central and local bioenergy installations

# Validation of formal proof of sustainability

Biofuel producer / supplier

National database

in



„NABISY“



adjustment

in



other databases



**How can be assured that a certain lot of sustainable biofuel is not declared more than one time ??**

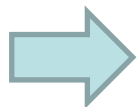
# GAP is not yet standardized for global biomass production



Art. 17 (6) of Directive 2009/28/EC:

*Agricultural raw materials cultivated in the Community and used for the production of biofuels and bioliquids taken into account for the purposes referred to in points (a), (b) and (c) of paragraph 1 shall be obtained in accordance with the requirements and standards under the provisions referred to under the heading 'Environment' in part A and in point 9 of Annex II to Council Regulation (EC) No 73/2009 of 19 January 2009 ... and in accordance with the minimum requirements for good agricultural and environmental condition defined pursuant to Article 6(1) of that Regulation.*

**GAP is standard for European farmers in schemes like REDcert, but not generally for farmers under certain schemes in third countries !**



**REDcert doesn't differentiate between cultivation in the Community and third countries, but imposes GAP criteria for all !**

# Outlook



- Germany is still quite ahead implementing the RED, but other member states are “getting closer”
- Growing number of certification schemes (especially EC approved) speed up the implementation process
- Tendency to EC approved schemes due to the fact that they’re obliged to accept only other EC approved schemes
- Need for harmonization of authorities administrative processes as well as of certification schemes