Submission:

RHI Consultation: Design and Implementation of a Renewable Heat Incentive in Ireland
Design and Implementation of a Renewable Heat Incentive in Ireland

1.0 Background

The Society of Irish Foresters welcomes the opportunity to make a submission outlining its views on elements of the proposed Renewable Heat Incentive (RHI) scheme that have the potential to impact on its members, the forest sector and the sustainable and best use of forest resources.

The Society of Irish Foresters is an all Ireland organisation and represents the interests of more than 700 members, predominantly professional foresters, but its membership includes a broad cross-section of people who are involved in or share an interest in forestry and the forest sector. The Society's mission is 'to advance and spread the knowledge of forestry in all its aspects'.

The overall aim of Government forest policy as set out in Forests, products and people is to develop an internationally competitive and sustainable forest sector that provides a full range of economic, environmental and social benefits to society and which accords with the Forest Europe definition of sustainable forest management. This aim reflects changes in socio-economic and environmental circumstances which have resulted in a progression in society's expectations of forests from mainly providing market goods towards the provision of more environmental goods. The essence of these changes lies in the expression of the public's understanding and interest in the multiple benefits that forests can provide and in particular the range of environmental and social services, focusing on biodiversity, water quality, landscape, recreation and leisure, climate change mitigation and renewable energy.

Ireland's forests have a unique potential to support a green economy, rural livelihoods, climate change mitigation, biodiversity conservation and enhanced water quality for the benefit of society. To deliver on this potential will require the wise management of existing resources and careful planning of future developments within the sector.

2.0 Introduction

The Society of Irish Foresters is aware that, if Ireland is to meet its obligations under the 2009 Renewable Energy Directive i.e. delivery of 12% of final heating demand from renewable sources by 2020, policy instruments such as the proposed RHI are urgently required. We also recognise that the agreed EU 2030 framework for climate and energy has set a target of at least 27% for the share of renewable energy consumed in the EU in 2030 which will be even more demanding. Given the lead-in time to develop the necessary infrastructure and robust supply chains for the delivery of forest biomass, the sector faces major challenges in the short to medium term.

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1 Department of Agriculture, Food and Marine, 2014. Forests, products and people. Ireland's forest policy - a renewed vision.
2 Forest Europe defines SFM as the stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfill, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.
2.1 Inclusion of Emissions Trading Sector (ETS)

Given the relatively short lead-in time for the proposed RHI scheme, there is a risk that there may not be sufficient take-up from industrial and commercial installations outside of the EU Emissions Trading Scheme leading to the non-achievement of the target 12% by 2020. The forest biomass sector, while it has made significant advances in recent years may not have the capacity and/or resources to provide the supply chains required to support the geographic spread of multiple installations outside of ETS to meet the target.

The Society would favour the inclusion of the ETS sector within the proposed RHI. However its participation should, in the short term, be capped at a maximum of 40% but subject to review in the light of uptake of the scheme.

2.2 Minimum Energy Efficient Eligibility Criteria

The estimated demand for forest biomass foresees a two-fold increase by 2020\(^3\). Despite the doubling of roundwood from Ireland's forests by 2035\(^4\), the demand for forest biomass is unlikely to be met in the short term from domestic resources and will require importation of biomass.

Given this supply/demand imbalance, it is critical that the most efficient use is made of our domestic resource. Thus it makes sense that minimum energy efficient eligibility criteria be applied to the renewable heat technologies that utilise forest biomass i.e. biomass boiler, biomass combined heat and power and biomass direct air heating.

The Society supports the view that that the Building Energy Rating (BER) scheme will apply to buildings in the commercial and public sector participating in the RHI, while for smaller industrial and agriculture heat users, and those with no significant process heating, a minimum efficiency criterion based on the individual energy performance scheme should be applied.

2.3 Minimum Technology Requirements

Irrespective of the projected supply demand imbalance for forest biomass, the Society concurs that it makes sense that minimum technology requirements be applied to renewable heat technologies including those that utilise forest biomass i.e. biomass boiler, biomass combined heat and power and biomass direct air heating. This will ensure minimum particulate and nitrogen oxide emissions.

2.4 Eligibility of Heat Use for RHI

The Society agrees that it is important to discourage bad practice and inefficient use of heat, where possible. However, in relation to the use of renewable heat being used for drying of biomass to improve the biomass fuel quality, the Society believes that there is a strong case for an exemption to be exercised.

\(^3\) COFORD Roundwood Demand Group. 2011. *All Ireland Roundwood Demand Forecast 2011-2020*. COFORD, Dublin

The drying of biomass will improve overall logistics, help ensure more speedy supply chain and delivery of quality biomass to market and has also the added benefit of mitigating emissions through the combustion of lower moisture content biomass.

The Society recommends that the drying of biomass carried out on a commercial basis be considered as an eligible heat use in the RHI, subject to eligibility assessment on a case by case basis.

2.5 The Impact of Biomass Combustion Air Quality and CO₂missions

Ireland is committed to reducing CO₂ emissions and has mandatory emission ceilings for air pollutants under the air National Emission Ceiling Directive (NECD). The Society recognises that emissions associated with biomass technologies are influenced by a number of factors, including fuel type and quality.

The Wood Fuel Quality Assurance Scheme (WFQA) is an Irish scheme that aims to ensure consumer confidence in the purchase of wood fuels throughout Ireland. It does so through the application of the fuel requirements outlined in EN ISO 17225, parts 1-5. The scheme is supported by the Department of Agriculture, Food and the Marine, the Irish BioEnergy Association, Teagasc and Waterford Institute of Technology (WIT).

The Society is strongly of the view that the WFQA be a mandatory requirement for participation in the RHI scheme for the purpose of fuel quality assurance.

2.6 Biomass Sustainability Criteria

Ireland through FOREST EUROPE (formerly Ministerial Council for the Protection of Forests in Europe), the EU Forest Strategy and its own forest policy outlined in Forests, products and people, is committed to the sustainable management of its forest resources and the sustainable delivery of forest ecosystem services. This commitment applies equally to the standing forest resource and to forest biomass. The Society promotes the principles of sustainable forest management through its field days, workshops, symposia etc. Sustainable forest management is the platform upon which the Society promotes forestry and the forest sector.

Currently, imported biomass must comply with the EU Timber Regulation which helps ensure that the timber was legally harvested. Compliance does not necessarily mean that the harvesting or the forest was sustainable. There are voluntary forest certification schemes e.g. Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC), compliance with which can provide evidence that forest resources are sustainably managed.

As both FSC and PEFC operate at a global scale, one option would be to insist that all forest biomass came from forests which were accredited to either FSC or PEFC. This approach would, in the Irish context, result in many of the country’s 19,000 forest owners being excluded from the biomass supply chain as there has been little uptake of these two schemes in the private sector to date.
The Society of Irish Foresters is of the view that, at this moment in time, there is considerable merit in viewing sustainability at a national level rather than individual forest owner or supplier levels. Accordingly, the Society believes that the criteria being proposed by the European Commission in the proposed revision of the Directive on the use of energy from renewable resources⁵ offers the basis for assessing sustainability at a national level.

The Society of Irish Foresters believes that the following should apply to the country in which forest biomass was harvested:

1. Has national and/or sub-national laws applicable in the area of harvest as well as monitoring and enforcement systems in place ensuring that (a) harvesting is carried out in accordance to the conditions of the harvesting permit within legally defined boundaries, (b) harvested areas are regenerated, (c) areas of high conservation value, including wetlands and peatlands, are protected, (d) the impacts of forest harvesting on soil quality and biodiversity are minimised and (e) harvest volume does not exceed the long-term production capacity of the forest.

2. Is a party to, and has ratified, the Paris agreement.

3. Has submitted a Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC), covering emissions and removals from agriculture, forestry and land use which ensures that either changes in carbon stock associated with biomass harvest are accounted towards the country’s commitment to reduce or limit greenhouse gas emissions as specified in the NDC, or there are national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks.

4. Has a national system in place for reporting greenhouse gas emissions and removals from land use including forestry and agriculture, which is in accordance with the requirements set out in decisions adopted under the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris agreement.
