

Renewable Energy Directive: Amendment of ANNEX IX

Austrian Compost & Biogas Association welcomes the extension of ANNEX IX (2018/2001/EU) in order to promote sustainable renewable energy production from different types of biomass feedstock.

Intermediate crops

We therefore support the explicit naming and including *“Intermediate crops, such as catch crops and cover crops that are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained”*. into Annex IX. Through growing these feedstocks usual negative effects of bare fallow like water and wind erosion and leaching of nutrients can be avoided ([Syn Energy II](#), [Verluste der oberirdischen Biomasse von abfrostenden Zwischenfrüchten](#)). Additionally, these feedstocks provide organic carbon and brings more life to the soil. Through digestion of main parts of grown biomass renewable energy can be produced, possible negative effects of catch crops can be avoided and additionally organic carbon and nutrients will be brought back to soil via digestate for soil nutrition ([BIOSURF D5.2](#)).

Due to this positive effects of *“Intermediate crops, such as catch crops and cover crops that are grown in areas where due to a short vegetation period the production of food and feed crops is limited to one harvest and provided their use does not trigger demand for additional land and provided the soil organic matter content is maintained”*. we highly recommend to include these feedstock types into ANNEX IX A with a new point u.

Biogenic by-products of bioeconomy processes

European Union can be seen as the leading market developing and transforming relevant production processes into a sustainable bioeconomy ([a sustainable bioeconomy for Europe](#), [bioeconomy action plan](#)). Therefore, bioeconomy will face a strong development due to EU legislation etc.

Although industry strengthen more and more the cascading principle and uses raw materials as good as possible, these wanted bioeconomy processes will always also produce unavoidable biogenic residues. These residues will fall clearly under article 5 By-products of WFD (2008/98/EU amended 2018/851/EU). The biogas technique is within the scientific community seen as the main partner for bioeconomy to further treat these residues via anaerobic digestion. Through this renewable energy can be produced and nutrients and organic carbon can be recycled and brought back for plant and soil nutrition. We therefore request to include an additional feedstock stream under ANNEX IX A “v) biogenic by-products according to article 5 of Directive (2008/98/EC) from bioeconomy processes;”