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State of
the Art

Short Rotation Coppice in Belgium

Review on Opportunities, Barriers
and Effects

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SHORT ROTATION COPPICE IN BELGIUM

Review on Opportunities, Barriers and Effects

**Jomme Desair, Julie Callebaut, Marijke Steenackers, Francis Turkelboom en
Lieven De Smet**

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Reading Guide

This report was drafted as part of the project “ADvanced Liquid BIOfuels for advanced engine concepts enabled by advanced wood breeding and catalysis” – Ad-Libio. In light of the climate crises, biodiversity crises but also the current energy crisis, alternative resources might be considered to achieve bioenergy goals, with better environmental results than our current first-generation biofuels. The Ad-Libio project focuses on wood from short rotation coppice as a feedstock for biofuel production. This report will also focus on short rotation coppice but will not specify its end use.

It is intended for all people in Belgium who wish to explore the possibilities of using woody biomass of short rotation coppice. Be it as a farmer, innovator, local government or policy maker.

The report gives an introduction to short rotation coppice in Belgium (chapter 1), with possible applications and an estimation of the current amount and availability of land. The complexity and challenges concerning policy and legislation on short rotation coppice is discussed in chapter 2. A summary of policy recommendations to adjust existing legislation can be found after the extended abstract. Insight into the interactions between stakeholders is given in the stakeholder analysis (chapter 3). Direct effects of short rotation coppice can be consulted under chapter 4. Here the ecosystem services, economics and social dimensions of short rotation coppice are discussed. The report ends with a discussion on the indirect and spillover effects of large scale short rotation coppice (chapter 5).



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Popularised summary

Planting fast growing wood species very close to each other and cutting them every few years is a way of producing a large amount of wood in a short period of time. The next year the stumps will start to grow again and will be ready for the next harvest after a year or two. This way you can produce wood for up to 30 years. This is called short rotation coppice (SRC). The produced biomass can be used for a growing number of things thanks to new technologies. It is clear that biomass will play an important role in our green economy. However, we should make sure to use these plantations in the right spots to ensure these can be beneficial for our natural environment, the cultural landscape, agriculture and our local economies. SRC has multiple benefits. It sequesters carbon from the air, supports biodiversity and cleans water. But we should avoid to plant them everywhere as these benefits depend on the local situation. Sometimes SRC can even be harmful. In this report we look into the effects of SRC on the environment and the people living in it, as well as the effects on the producers. We also make an estimate of the possible availability of space. We conclude that SRC could be very useful to increase biodiversity and support a healthy natural living environment in agricultural and industrial landscapes. Nonetheless, there is a right place and management for SRC. Nature will benefit most if we let the trees grow longer and if we do not harvest everything at the same time. But using more environmentally friendly practices will be less profitable for the owner and therefore might need government or private support. This is not the only barrier. The legislation on how and where you are allowed to plant SRC is complex and unclear. Moreover, farmers who could benefit from SRC are not always interested and feel that it is their duty to produce food instead of wood. Still we believe that with the right incentives, changes in legislation and financial benefits, biomass from short rotation coppice could play a necessary role in our future green economy.



Résumé vulgarisé

Planter des espèces de bois à croissance rapide très proches les unes des autres et les couper toutes les quelques années est un moyen de produire une grande quantité de bois en un court laps de temps. L'année suivante, les souches recommenceront à pousser et seront prêtes pour la prochaine récolte après un an ou deux. De cette façon, on peut produire du bois pour une période allant jusqu'à 30 ans. C'est ce qu'on appelle le taillis à courte rotation (TCR). Grâce aux nouvelles technologies, la biomasse produite peut être utilisée pour un nombre croissant de choses. Il est clair que la biomasse jouera un rôle important dans notre économie verte. Toutefois, nous devons veiller à utiliser ces plantations aux bons endroits afin qu'elles puissent être bénéfiques pour notre environnement naturel, le paysage culturel, l'agriculture et nos économies locales. Les avantages du TCR sont multiples. Il séquestre le carbone de l'air, soutient la biodiversité et nettoie l'eau. Mais nous devons éviter de développer ces plantations partout car ces avantages dépendent de la situation locale. Parfois, le TCR peut même être nuisible. Dans ce rapport, nous examinons les effets du TCR sur l'environnement et les personnes qui y vivent, ainsi que les effets sur les producteurs. Nous faisons également une estimation de la disponibilité éventuelle de l'espace. Nous concluons que le TCR pourrait être très utile pour accroître la biodiversité et favoriser un environnement naturel sain dans les paysages agricoles et industriels. Néanmoins, il existe un lieu et une gestion appropriés pour le TCR. La nature profitera davantage si nous laissons les arbres pousser plus longtemps et si nous ne récoltons pas tout en même temps. Mais l'utilisation de pratiques plus respectueuses de l'environnement sera moins rentable pour le propriétaire et pourrait donc nécessiter un soutien public ou privé. Ce n'est pas le seul obstacle. La législation sur la manière et l'endroit où il est autorisé de planter du TCR est complexe et peu claire. De plus, les agriculteurs qui pourraient bénéficier du TCR ne sont pas toujours intéressés et estiment qu'il est de leur devoir de produire de la nourriture plutôt que du bois. Nous sommes néanmoins convaincus qu'avec des incitations appropriées, des modifications de la législation et des avantages financiers, la biomasse issue de taillis à courte rotation pourrait jouer un rôle nécessaire dans notre future économie verte.

biomass sources such as wood from increased harvesting in forests or biomass transported over long distances.



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List of abbreviations

ANB	Agentschap Natuur en Bos = Flemish agency for nature and forest
CAP	Common agricultural policy
CoDT	Code de Développement Territorial = Spatial development code
EAG	Ecologisch aandachtsgebied = Ecological focus area
ES	Ecosystem Service
GHG	Greenhouse gases
GMO	Genetically modified organism
ILUC	Indirect land use change
LULUCF	Land use, land use change and forestry
OVAM	Openbare Afvalstoffenmaatschappij voor het Vlaams Gewest = Public Waste Agency of the Flemish Region
SPW	Service Public de Wallonie = Walloon public service
SRC	Short rotation coppice
SSA	Spatially sensitive areas
VEN	Vlaams ecologisch netwerk = Flemish ecological network
VLM	Vlaamse Landmaatschappij
vSRC	Very short rotation coppice

1 INTRODUCTION TO SHORT ROTATION COPPICE IN BELGIUM

1.1 SHORT ROTATION COPPICE PRODUCTION IN BELGIUM

Short Rotation Coppice (SRC) is a woody biomass production system that comes in many shapes and sizes. The common denominator is the dense planting of a few, selected and fast-growing tree species that quickly resprouts after being cut back to about 5 – 10 cm above the mowing field. The main species in Belgium meeting these characteristics are species from the genera willow (*Salix*) and poplar (*Populus*).

A plantation is made by planting un-rooted cuttings of these species with a length between 20 and 50 cm at a high density and often in twin rows to facilitate harvesting. This can be done with a specialised planting device which is towed by a tractor as illustrated in Figure 1.1. This device shoots the entire shoot in the ground, after which it is cut at the preferred length, leaving the cutting planted. A leek planter can also be used which plants pre-cut cuttings of 25 cm. Depending on the distance within and between the rows, a planting density of 5,000 up to even 30,000 cuttings per hectare can be achieved. Most commonly a density of 12.000 to 20.000 cuttings per hectare is used.



Figure 1.1: Planting of an SRC with the Energy Planter - Source: Egedal Maskinfabrik

Traditionally, this plantation is harvested in rotations of 2 to 5 years, but this can also be as long as 8 to 10 years, depending on the growth conditions and management practices. The next growing season, the stumps sprout back and the plantation starts to grow again. After a few rotations, the stumps are exhausted and production decreases. This usually happens after 6 to

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7 rotations or 20 to 25 years after planting. After the last harvest, the stumps are removed or ploughed into the soil. After this, planting can take place again with new varieties or the land can be used (again) for other purposes, such as agriculture. An example of the different steps in SRC cultivation practices that are used in Belgium:

- 1) Ploughing and harrowing before the planting season
 - a. Optional: Application of herbicide
- 2) Planting of the cuttings in early spring to early summer (March – June)
 - a. Optional: sowing of cover crops
 - b. Optional: application of fertiliser
- 3) Mechanical weeding during first (two) year(s)
 - a. Optional: application of pesticides
 - b. Optional: application of fertiliser
 - c. Optional: cut back after first year for increased yield afterwards (only during the first rotation)
- 4) Optional: Clear fallen stems to increase harvest efficiency
- 5) Harvesting [return to step 3]

This is also visually represented in Figure 1.2 for the production of bioenergy. This overview was made in the context of the POPFULL project of University of Antwerp (2009 - 2014)¹.

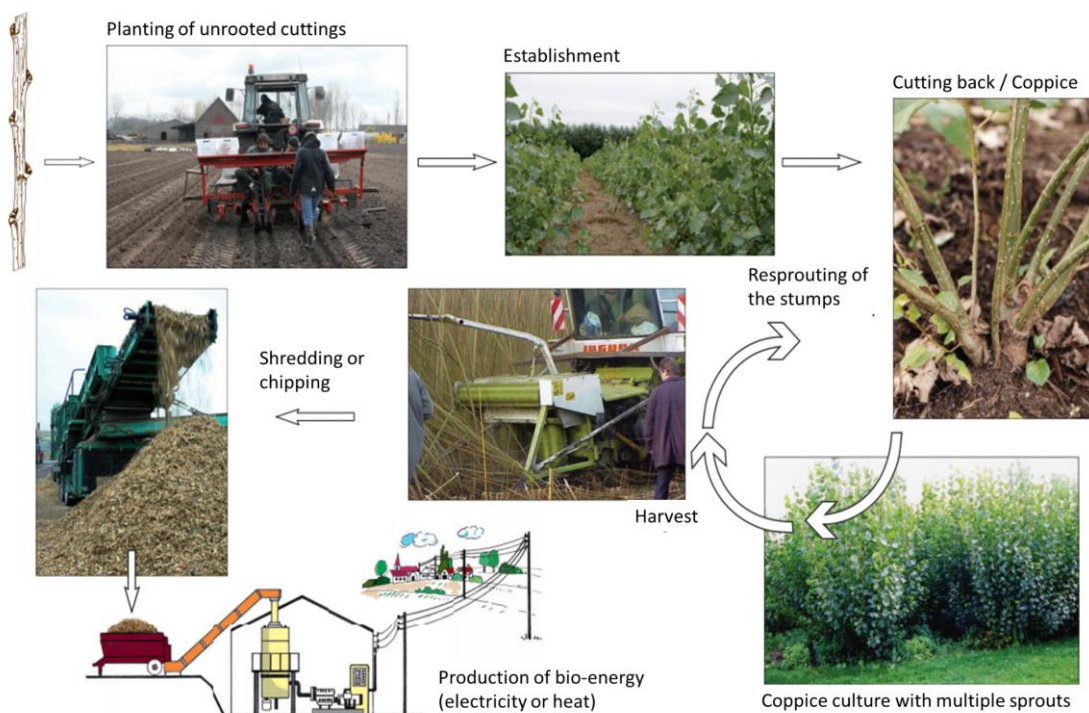


Figure 1.2: Schematic representation of the operations of an SRC plantation for the production of bioenergy - Source: POPFULL project University of Antwerp

Prior to planting, soil cultivation is necessary to facilitate the rooting of the cuttings. This means ploughing to a depth of 30 cm in autumn before planting and harrowing in spring. If necessary,

¹ <https://webhosting.uantwerpen.be/popfull/>

a herbicide is used before ploughing and/or harrowing. During the first two years of establishment or after each rotation, it is necessary to either mechanically or chemically control the undergrowth to limit its competition with the cuttings. Alternatively, cover crops can be used which can be sown in at the same time as the plantation as shown in Figure 1.3. They bring a number of benefits like increased biodiversity and pest control and possibly nitrogen fixation but require more know-how.



Figure 1.3: Young willow SRC with a clover cover crop. Photo credits: Olivier Poncin - Phitech

In case a monoculture is planted with one or very few clones, the plantation is sometimes susceptible to diseases and pests (De Somviele *et al.*, 2009). Treatment with fungicides and/or insecticides could in that case be considered, however this is often not cost-effective and a good genetic mixture of the plantation is a more efficient way to cope with pests. A common pest species are leaf beetles (Chysomelidae) which can be effectively managed by increasing nesting opportunities for birds predating them like tits (Paridae family) or starlings (*Sturnus vulgaris*). Also mammals pose a threat to the good development of the plantation, irrespective of the genus/species/clone mixture. Voles (e.g. *Arvicola scherman*) can be managed naturally by favouring conditions for foxes and mustelids (O. Poncin, personal communication, May 14, 2022) while the wild boar (*Sus scrofa*) is best avoided by small patches (ValBiom, personal communication, September 23, 2022). Fertiliser can be applied in between rotations. However, this is in most cases not necessary, in particular when planted on previous or abandoned agricultural land. The necessity is best determined by a soil sample analysis.

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Several machines can be used for the harvest, influencing the price, possible end-product and resprouting capacity (Vanbeveren *et al.*, 2018). Which type can be used depends on the diameter of the stems, the species and the planting scheme. The diameter reached after a number of years depends on the growth conditions and the species. Poplar for example produces less but thicker stems than willow. For very short rotations (<3 years, diameter <6 cm) a converted corn harvester can be used. These harvesters will produce chips on-site. or a specialised SRC harvester. Both harvesters will produce chips. Medium-length rotations (2-5 years, diameter < 10 cm) require a specialised SRC machine. These machines are light and are hooked up to a tractor such as the Energy harvester² as demonstrated in Figure 1.4. They produce chips that are deposited directly into a trailer.



Figure 1.4: Energy harvester in action. Photo credits: Olivier Poncin - Phitech

For long rotations (>5 years, diameter > 10cm), forestry machines must be used. For these rotations the choice can be made to transport the trees in their entirety or to also chip them on the spot. Recently, a fourth type of harvesting machine was tested in Belgium, the Biobaler. It can handle stems of medium rotation and rolls the trees into bales that can afterwards be chipped or transported in its entirety.

Harvesting is out of economic considerations often done for the whole plantation at once in a clearcut. Yields of SRC are highly dependent on the soil and weather conditions, management practices and the species and varieties used. the first rotation in general has much lower yields, ranging between 5 and 6 t ha⁻¹y⁻¹ of dry matter. In the longest running SRC experiment in

² <https://nyvraa.dk/en/machinery/>

Belgium, average dry biomass yields was 5,3 t ha⁻¹y⁻¹ after 4 rotation (16 years) with yields of different poplar clones ranging from 0 to 10,5 t ha⁻¹y⁻¹ (Dillen *et al.*, 2013). Nonetheless, yields of 12,5 t ha⁻¹y⁻¹ are generally accepted to be the average in Belgium (Laureysens *et al.*, 2004; Meiresonne, 2006; Verlinden *et al.*, 2015). Through selection and breeding, poplar clones with an average yield of 20 t ha⁻¹y⁻¹ were achieved at INBO (Meiresonne & Jansen, 2018).

The cultivation of *Miscanthus* is very similar to SRC. This system uses a dense plantation of the fast-growing lignocellulosic perennial grass species *Miscanthus* to rapidly produce biomass. This exotic species has the advantage that it produces less thick stems which can be handled with normal agricultural machinery, can be harvested every one or two years and does not require drying. This makes it an easier cultivation than SRC. Nonetheless *Miscanthus* plantations might not sustain as much biodiversity as SRC could (Williams *et al.*, 2019, 2022).

To summarise:

there are a few constant factors in SRC plantations:

- Short rotations (< 10 years)
- Use of specific species (poplar and willow) and often specific cultivars
- High planting density (5.000 – 30.000 cuttings per hectare)
- Wood chips as the end product

However, there are also a number of factors that are more flexible and that can have a significant influence on the overall sustainability of the system.

- Rotation length (2 to 10 years)
- Harvesting techniques (clear cuts to phased harvesting)
- Number of cultivars (monocultures to high diversity)
- Undergrowth management (initial ploughing and intensive management of undergrowth to no ploughing and cover crops)
- Fertilisation (application of fertiliser every rotation to no use of fertiliser)
- Pest management (use of herbicides, fungicides and insecticides to no use of pesticides)

1.2 POSSIBLE APPLICATIONS OF WOOD FROM SRC

Woody biomass in general can have multiple applications: material (furniture, boards, paper, building materials, etc.), electricity and/or heat generation, soil improvement, extraction of certain organic components (bio-oil, fungicides, salicin,...), animal feed, liquid biofuel etc. However, not every type of woody biomass can be used for every application, due to technological limitations. In addition, to increase the efficiency of the bio-economy and to stimulate circularity, it is not permitted to use every stream for every purpose (this will be further explained in chapter 2). In this report, we focus on wood from SRC plantations, for which thus some specific rules and possible applications apply. Irrespective of the rotation length, the end product of a SRC plantation is usually chips. Since these chips are made from thin stems, they have a rather high bark to wood ratio. Because of this characteristic, the chips are currently regarded as only suitable for energy production or composting. Nonetheless, it is very possible that in the near future wood from SRC will also be used for a wide range of other applications such as materials, bio-components and liquid fuels as these technologies are in full development.



The use of biomass as an energy source has long been on the rise (Camia *et al.*, 2021). In chapter 14 of the INBO NARA-T report: Ecosystem service production of energy crops (Van Kerckvoorde & Van Reeth, 2014), the rising demand is ascribed to a number of indirect drivers: (1) demographic growth, (2) higher energy use due to economic growth, (3) increased interest by policy at all levels in function of low-carbon solutions and energy independence (European, national, regional, local), (4) cultural drivers such as a growing awareness of the climate problem, (5) new technologies that can tap into more residual flows and do this more efficiently. Nevertheless, this increase is not unrestrained and there are a number of direct drivers that influence the supply and demand of woody biomass for energy production: (1) land conversion and land-use conversion, which changes the availability of wood, however, these changes are difficult to predict, making it difficult to estimate the final effect; (2) changes in pollutants and nutrients such as atmospheric nitrogen deposition, the effect of which is not yet certain; (3) overexploitation, which has a negative effect, (4) climate change, where more extreme weather conditions may offset higher productivity, (5) the introduction of exotic species, whereby higher biomass yields can be obtained through the use of non-native varieties, but which could also lead to the unwanted introduction of new pests and diseases and invasive species.

It is very likely that woody biomass will play an increasingly important role in energy supply in the near future (Wille, 2016). The new policy initiatives focusing on renewable energy already demonstrate this (see section 2.2). but due to the complexity and interdependence of the energy sector with other wood-processing sectors, agriculture, forestry and the international market in general, it is difficult to estimate how this growth will evolve in Belgium, and what part SRC will play.

1.3 CURRENT AMOUNT OF SRC IN BELGIUM

Short rotation coppice has never been implemented on a large scale in Belgium, even though an extensive amount of research on the subject has already been done (De Somviele *et al.*, 2009; Meiresonne, 2006; Verlinden *et al.*, 2015).

In 2021 there was a total of about 83 hectares SRC in Belgium planted on agricultural land, of which 31 ha in Wallonia and 52 ha in Flanders³. This might not cover all of the SRC plantations since SRC can also be planted on non-agricultural land under certain circumstances. However, there are no other available datasets to accurately quantify SRC on non-agricultural land. It was reported for Wallonia that there is certain amount of SRC planted by private owners on non-agricultural land, which therefore is not declared in the agricultural data. These plantations would however only amount up to some 50 hectares (ValBiom, personal communication, September 23, 2022). This proves that in Belgium there is little practical application of SRC. As far as *Miscanthus* concerns, there is a higher area planted in Belgium. In Flanders 77 ha were reported in 2021 whereas in Wallonia this even amounted up to 274 ha. This means there is a total of 351 ha of *Miscanthus* plantations in Belgium on agricultural parcels, about 4 times more than SRC.

³ Calculated from the Parcellaire agricole anonyme, situation 2021 (Service public de Wallonie) and the Landbouwgebruikspcelen 2021 (Departement Landbouw en Visserij)

Figure 1.5 shows the evolution of the SRC area in Belgium from 2008 until 2021. After a peak in the year 2013 (100 ha) in Flanders, the area of SRC in Flanders has decreased and stabilised around 55 ha for most recent years. Also in Wallonia, the area of SRC has decreased over the years from 50 ha in 2015 to around 30 ha in 2021. Trends outside the agricultural areas are unknown for Flanders. In Wallonia, an increasing interest is reported outside agricultural areas for hunting reasons (ValBiom, personal communication, September 23, 2022).

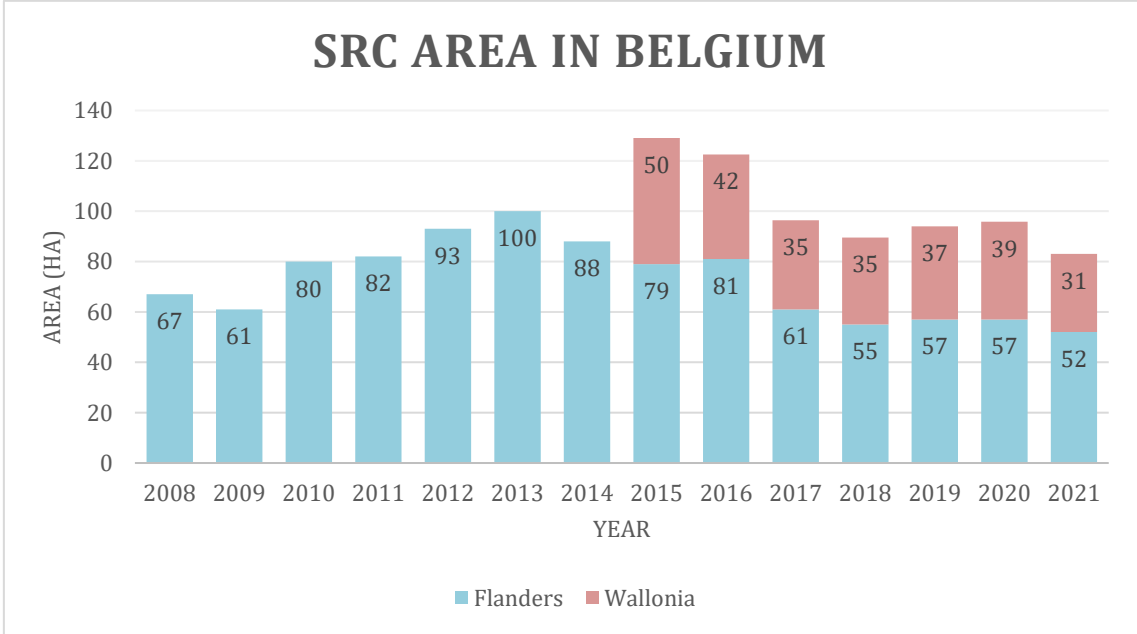


Figure 1.5: Evolution of SRC area in Belgium (*'Landbouwgebruiksparcelen' 2008-2021 and 'Parcelle Agricole anonyme' 2015-2021; no data for the years 2008-2014*)

In the year 2021, the total area of SRC in Flanders consists of 58 agricultural parcels, all below 10 ha in size (see Figure 1.6). In Wallonia we see a similar trend: the area of SRC consists of 36 agricultural parcels, all below 10 ha in size. The majority of SRC parcels in Belgium are below 1 ha in size, which might indicate that even small patches of SRC have a certain yieldability or return on investment. Due to the small size of these patches, these do not qualify as plantations, however these patches not only concern field borders, but also wider and more condensed areas.



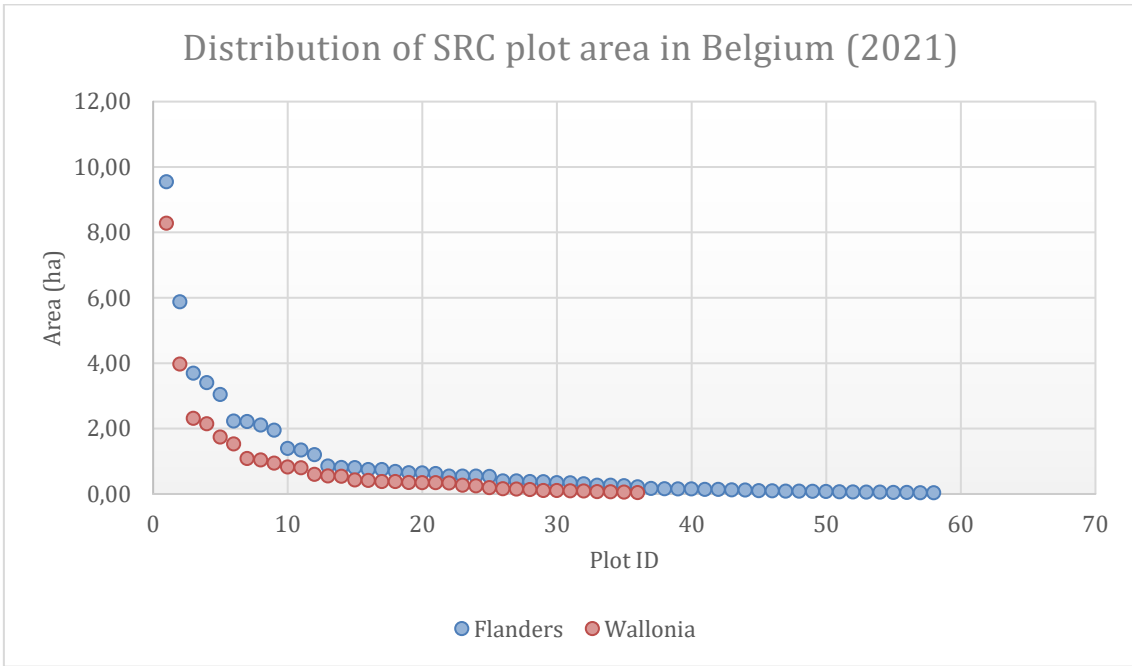


Figure 1.6: Distribution of SRC plot area

The parcels with SRC are scattered across Belgium (see Figure 1.7). In Flanders, most SRC parcels are located in the provinces of West-Flanders, East-Flanders and Antwerp. In Wallonia, SRC parcels are concentrated in the province of Walloon-Brabant and the west of Henegouwen. The parcel boundaries are presented with a thicker line, hence making the locations more visible on the map. In reality however, these parcels are smaller snippets.

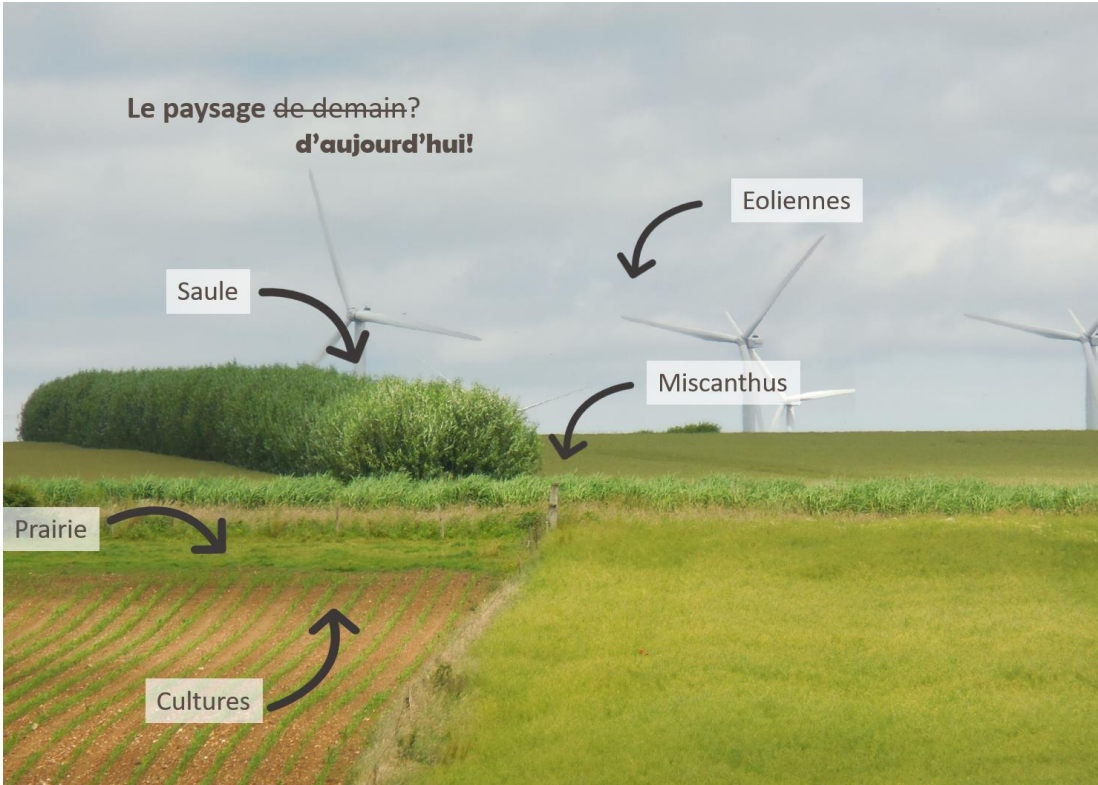


Figure 1.8: Example of linear short rotation coppice in an agricultural landscape. Photo credits: Olivier Poncin - Phitech



Figure 1.9: Example of linear short rotation coppice in between crops. Photo credits: Olivier Poncin - Phitech



Figure 1.10: Example of chicken breeding underneath short rotation coppice. Photo credits: Olivier Poncin - Phitech

We will estimate the potential area in Flanders for short rotation coppice in two stages. In the first stage we take into account certain land use types that could offer realistic opportunities to be developed or converted into SRC, such as fallow land or vacant industrial sites. By ‘realistic’ opportunities, we mean that we limit SRC potential to land that is not suitable for food production. Nor will nature reserves or forests with high biodiversity be counted as potential areas for SRC. Linear agroforestry elements like mentioned in the examples above, do not fall under this assumption. This first estimation exercise does not emphasise making assumptions of converting a certain percentage of existing land use types. In a second stage we do make assumptions on current land-uses of which a percentage could theoretically be converted to SRC in the near future. It should be noted however that these theoretical assumptions usually result in very high potential areas for SRC.

Table 1.1 gives an overview of the land use forms in Belgium that could be considered for immediate development of SRC (based on De Somviele et al., 2009). For each land use form, an indication of the potential area for SRC is given (in hectares).

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Table 1.1: Land use forms in Belgium, with immediate potential for SRC

Land use category	Land use forms (with current area in ha)	Potential area for SRC	Dataset
Agricultural zones Flanders	Fallow land (undeveloped, vacant): <ul style="list-style-type: none"> ● Fallow land with minimal activity, <i>with</i> ecological area of interest (283 ha) ● Fallow land with minimal activity, <i>without</i> ecological area of interest (461 ha) ● Fallow land without minimal activity (251 ha) 	995 ha (total of fallow land categories)	<i>Landbouw gebruiksprecellen LV, 2021</i>
Agricultural zones Wallonia	<ul style="list-style-type: none"> ● Fallow land (3010 ha) ● Fallow land planted for pollinators (32 ha) ● Non-herbaceous fallow land (180 ha) ● Non-agricultural use (log storage, ..) or wasteland (0 ha) 	Around 3000 ha	<i>Parcelle Agricole anonyme, 2021</i>
Industrial sites Flanders	Vacant land (<i>braakliggendeGrond</i>), of which: <ul style="list-style-type: none"> ● Contaminated sites (171 ha) ● Sites with water issues (152 ha) ● Sites which are physically not feasible to be developed as industrial sites (135 ha) 	5.919 ha	<i>Bedrijvente rreinen_OS LO_202202 10_Shapefile</i>
	Vacant land AND not offered (<i>Braakliggende grond EN niet Aangeboden</i>)	5.052 ha	
	Dredging sludge dumps on land: In the past, it was generally accepted that the dredged material released during the dredging of waterways was left on fields and lower areas without any protective measures or control. Dredged material was fertile and it was not considered that it might be contaminated by discharges into the watercourse.	/	<i>No data</i>
	Buffer strips along industrial sites. The total perimeter of all industrial sites in Flanders is around 6.341.132 m.	Theoretical estimation based on assumption of a buffer around all industrial sites in Flanders: 1m buffer \cong 600 ha 2m buffer \cong 1.200 ha 3m buffer \cong 1.800 ha	<i>Bedrijvente rreinen_OS LO_202202 10_Shapefile</i>
Soils for water treatment	SRC can be used as a wastewater treatment plant for pre-treated domestic wastewater (Istenič <i>et al.</i> , 2021).	/	<i>No data</i>
Road or railway verges Flanders	The total area of roadside verges along the Flemish road network amounts to 20.000 to 25.000 ha. Of this, the Agency for Roads and Traffic manages about 9.000 ha along motorways and regional roads. Patches of these 9.000 ha are under coppice management.	The total area currently under coppice management, calculated from the shp file received from 'Agentschap Wegen en	<i>Hakhoutbe heer2021-2022_lijn</i> <i>Source: https://w</i>

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1.11 Fout! Verwijzingsbron niet gevonden.) are available for Europe ([Magic Maps](#)), and can give a rough indication of potential locations for SRC on marginal lands not suitable for agriculture. In Figure 1.11 the share of agricultural land which is classified as marginal because of natural constraints (climate, wetness, fertility, chemicals, rooting, terrain) is visualised.

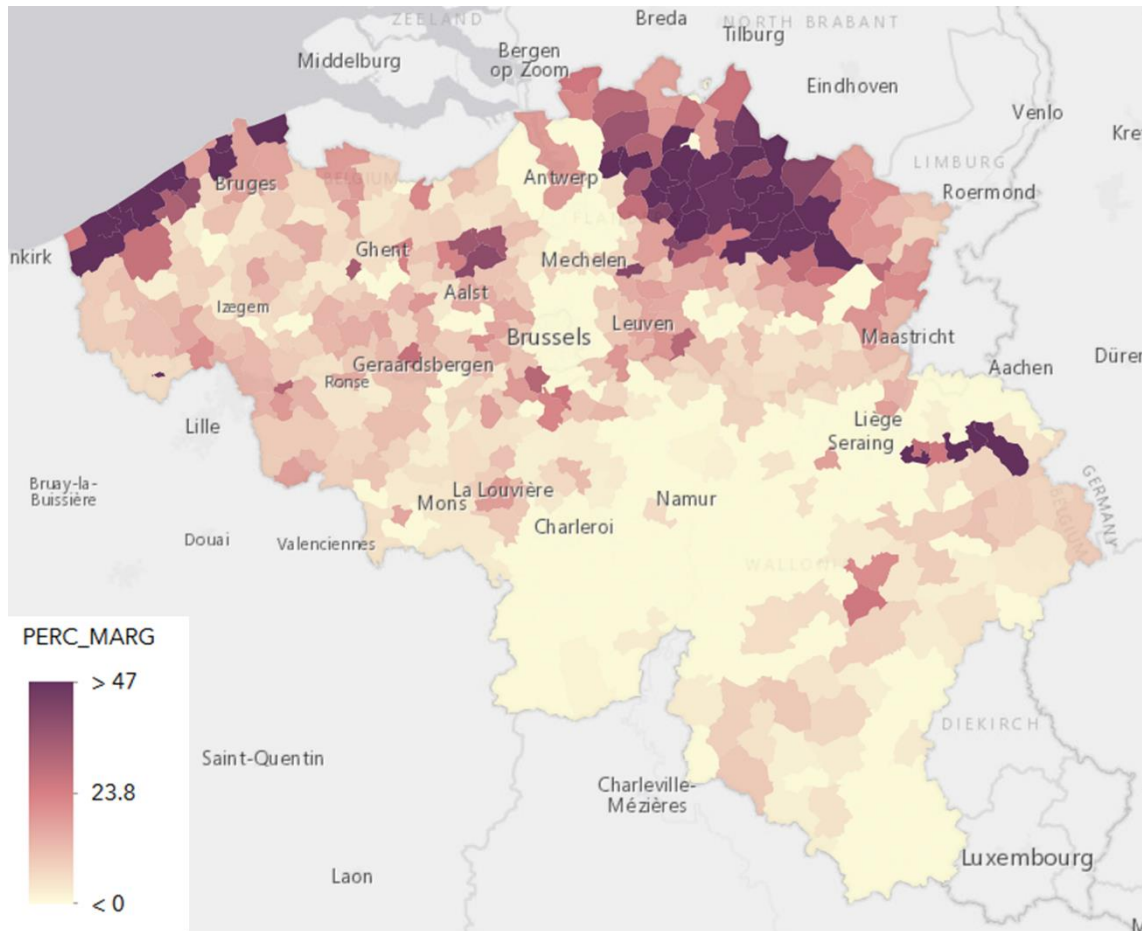


Figure 1.11: Marginal Land Area in Belgium as percentage of agricultural land (Magic Maps - Magic project)

In a second estimation exercise we look into hypothetical areas for SRC that would substitute other productive land uses.

Table 1.2 gives an overview of the land use forms in Belgium that could potentially be considered for SRC. For each land use form, an indication of the potential area for SRC is given (in hectares).

- The first land use forms are low-yield crops, now used for animal feed and biofuels. In a plausible scenario where first generation biofuels are phased out (see section 2.2 on emerging policy initiatives on this subject) this would free up land which could be used for second generation biofuels from SRC. Also the reduction of land used for animal feed is plausible as the European Farm to Fork strategy aims to shift diets more towards plant-based, and also the Flemish PAS⁴ aims at reducing the amount of animals, freeing up agricultural land for other purposes, such as SRC.

⁴ PAS (Programmatiese Aanpak Stikstof or Programmatic Approach to Nitrogen) is a framework which sets out the emission rights for nitrogen. It includes reduction targets for the amount of pigs in Flanders. (Departement Omgeving, 2022)

- The second land use form consists of ecological focus areas (ecologisch aandachtsgebied - EAG) which every farmer with over 15 hectares of arable land is obliged to install to receive the basic payment of the CAP. This concerns 5% of the total arable land of the farmer and SRC is eligible to be produced within these focus areas (see section 2.4).

Table 1.2: Land use forms in Belgium, with hypothetical potential for SRC (based on Landbouwgebruikspcelen LV, 2021, Parcellaire agricole anonyme, 2021)

Land use forms (with current area in ha)	Potential area for SRC Assumptions based on % of conversion																																																																	
<p>Low-yield crops (crops used for animal feed, agricultural crops partly used as biofuel such as wheat, maize, sugar beet or rape-seed)</p> <table border="1"> <thead> <tr> <th>Low-yield crops</th> <th>Area Flanders (ha)</th> <th>Area Wallonia (ha)</th> <th>Total area Belgium</th> </tr> </thead> <tbody> <tr> <td>Animal fodder⁵</td> <td>26.301</td> <td>417.442</td> <td>443.743</td> </tr> <tr> <td>Wheat</td> <td>64.249</td> <td>128.690</td> <td>192.939</td> </tr> <tr> <td>Sugar beet</td> <td>18.808</td> <td>37.254</td> <td>56.062</td> </tr> <tr> <td>Rape-seed</td> <td>597</td> <td>7.821</td> <td>8.418</td> </tr> <tr> <td>Grain maize</td> <td>42450</td> <td>7166</td> <td>49.616</td> </tr> <tr> <td>Silo maize</td> <td>128998</td> <td>59301</td> <td>188.299</td> </tr> <tr> <td>Total</td> <td>281.404</td> <td>657.674</td> <td>939.077</td> </tr> </tbody> </table> <p>Two different methodologies are proposed in (Van Kerckvoorde & Van Reeth, 2014) for calculating the area used for first generation biofuels, based on different approaches and assumptions.</p> <p><u>Methodology 1:</u> For wheat, sugar beet and grain maize, it is assumed that only 2% of the total area is eligible for energy purposes; the rest is mainly for food production (Van Kerckvoorde & Van Reeth, 2014). For Belgium this would mean a total area of around 6000 ha.</p> <table border="1"> <thead> <tr> <th>Crop</th> <th>Total area (ha)</th> <th>2% (ha)</th> </tr> </thead> <tbody> <tr> <td>Wheat</td> <td>192939</td> <td>3859</td> </tr> <tr> <td>Sugar beet</td> <td>56062</td> <td>1121</td> </tr> <tr> <td>Grain maize</td> <td>49616</td> <td>992</td> </tr> <tr> <td>Total</td> <td>298617</td> <td>5972</td> </tr> </tbody> </table> <p>For rape-seed it is assumed that 30% is cultivated for energy purposes (Van Kerckvoorde & Van Reeth, 2014). For Belgium this would mean a total area of around 2500 ha (30% of 8418 ha).</p> <p><u>Methodology 2:</u></p>	Low-yield crops	Area Flanders (ha)	Area Wallonia (ha)	Total area Belgium	Animal fodder ⁵	26.301	417.442	443.743	Wheat	64.249	128.690	192.939	Sugar beet	18.808	37.254	56.062	Rape-seed	597	7.821	8.418	Grain maize	42450	7166	49.616	Silo maize	128998	59301	188.299	Total	281.404	657.674	939.077	Crop	Total area (ha)	2% (ha)	Wheat	192939	3859	Sugar beet	56062	1121	Grain maize	49616	992	Total	298617	5972	<p><u>Methodology 1:</u> Theoretical assumptions based on % of conversion to SRC of the total area of energy crops (8500 ha)</p> <table border="1"> <thead> <tr> <th>%</th> <th>Belgium (ha)</th> </tr> </thead> <tbody> <tr> <td>1%</td> <td>≅ 85</td> </tr> <tr> <td>5%</td> <td>≅ 425</td> </tr> <tr> <td>10%</td> <td>≅ 850</td> </tr> <tr> <td>20%</td> <td>≅ 2.125</td> </tr> <tr> <td>50%</td> <td>≅ 4.250</td> </tr> <tr> <td>75%</td> <td>≅ 6.375</td> </tr> </tbody> </table> <p><u>Methodology 2:</u> Theoretical assumptions based on % of conversion to SRC of the total area of energy crops (25.000 ha)</p> <table border="1"> <thead> <tr> <th>%</th> <th>Belgium</th> </tr> </thead> <tbody> <tr> <td>1%</td> <td>≅ 250</td> </tr> </tbody> </table>	%	Belgium (ha)	1%	≅ 85	5%	≅ 425	10%	≅ 850	20%	≅ 2.125	50%	≅ 4.250	75%	≅ 6.375	%	Belgium	1%	≅ 250
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⁵ The crop group 'animal fodder' collects a whole range of crops, from fodder beets and fodder turnips, to fodder grasses such as lucerne, clover and mixtures of grasses and leguminous plants.

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<p>The study Van Kerckvoorde & Van Reeth, 2014 estimates a total of 3500 ha of silo maize for energy production in 2011, in Flanders alone. The same study mentions an estimated total of 21.500 ha for the energy crops wheat, sugar beets and rape-seed in Belgium in 2010. This would add up to a rough total of 25.000 ha.</p>	<table border="1"> <tr><td>5%</td><td>≅ 1.250</td></tr> <tr><td>10%</td><td>≅ 2.500</td></tr> <tr><td>20%</td><td>≅ 5.000</td></tr> <tr><td>50%</td><td>≅ 12.500</td></tr> <tr><td>75%</td><td>≅ 18.750</td></tr> </table>	5%	≅ 1.250	10%	≅ 2.500	20%	≅ 5.000	50%	≅ 12.500	75%	≅ 18.750												
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When it comes to these potential conversions of low-yield crops and ecological focus areas, estimations were made based on assumptions, to get a rough idea of the size range. The total area of low-yield crops in Belgium is relatively high, especially using the second methodology. As these low-yield crops can have different purposes (food, fodder or energy purposes) only a percentage of the total area eligible for energy purposes is taken into account. Accurate data on the areas in Belgium where crops are cultivated for energy purposes are not available, therefore different methods are mentioned in the table, based on different available figures. The percentage of the first-generation biofuel crops that would be replaced could arguably range up to 100 in the future as there is a clear policy goal of phasing these out. We propose a more conservative 50% which would yield between 4.250 and 12.500 hectares in the longer run. For feed crops there are no clear targets on the reduction of animals (except for pigs in the PAS) and moreover, no clear numbers on the amount of domestically sourced feed. Therefore no estimation was done for land being freed up by shifting diets.

The total area available in Belgium as ecological focus area could theoretically amount up to around 41.852 hectares. However, this would certainly not be the most environmentally sustainable implementation. Assuming a more appropriate (but still optimistic) 10% of this area would be used for SRC, this would add another 4.200 hectares. A more conservative estimation of 5% would yield about 2.100 hectares. This area would yield about 252.000 tons of dry matter per year, not taking into account potential lower yields from marginal lands.

⁶ Provided by Departement Landbouw & Visserij for the year 2021

⁷ For the year 2019 (Wallonie agriculture SPW, 2021)

To summarise:

Agricultural areas are only scarcely available for direct use for SRC. Even though there are 4.000 hectares of fallow land in Belgium, it is currently difficult to estimate if these are kept under fallow long enough to make SRC a viable option. There could be a potential for SRC when replacing a percentage of first-generation biofuel crops or feed crops. If the phasing out of these fuels would lead to a reallocation of 75% of the land towards second generation, this would yield between 4.250 and 12.500 hectares in the longer run. The mandatory ecological focus areas also provide opportunities. This could theoretically range between 400 - 4.000 hectares of agricultural land. Industrial sites that have not been developed yet are also promising for immediate implementation of SRC with about 5.000 hectares theoretically available, not taking practical constraints into consideration. Buffers around industrial sites would yield only a minor increase in area. Other promising land uses are impossible to estimate with the current available data.

1.5 SUMMARY AND RECOMMENDATIONS ON CURRENT SRC SYSTEMS IN BELGIUM

The knowhow on SRC and the necessary machinery is already present in Belgium. Experience has moreover shown that yields in Belgium can reach 12 t of dry matter per ha per year, without intensive fertilisation on former agricultural land. Nonetheless current amounts of SRC show that there is only little interest in this production method. This could be a reflection of the scarce applications that are currently available for wood from SRC, namely use as solid biomass fuel or composting. With technological advances and increased policy interest in biomass for multiple applications, this could change in the near future. Should there be a higher interest in SRC, 5.000 ha of land could in theory directly be directed towards its cultivation. This could increase to 21.000 ha should land be freed up from phasing out of first-generation biofuels and shifting to more plant-based diets. This area would yield about 252.000 tons of dry matter per year, not taking into account potential lower yields from marginal lands.

It is clear that should policymakers want to increase the production of biomass, short rotation coppice has the potential to rapidly supply this. However, its slow or even absent development in Belgium shows that multiple barriers have to be overcome to unlock its potential in the future green economy.

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2 POLICY AND LEGISLATION ON SHORT ROTATION COPPICE

Depending on the rotation length and the destination of the parcel it is planted on, SRC can be an agricultural crop on agricultural land or forestry on forest land and everything in between. Its product has multiple possible applications ranging from highly valuable bio-components to building materials to heat and/or electricity/liquid fuel generation. Because of this range of land use types and applications, it should not come as a surprise that there are multiple policy documents that regulate the planting and use of SRC (products). Moreover, as was made clear in section 1.2, policy has a significant influence on both the supply and demand for woody biomass. In this chapter, the most important European, national and regional policy documents and regional legislation will be reviewed. In Figure 2.1 the major policy initiatives and legislation that impact the planting and management of SRC plantations, as well as the use of its end product- biomass, are visualized according to their policy level and phase of the production chain it regulates. This chapter will first look into the policy initiatives and resulting legislation that situate SRC in our current and future bioeconomy, both as a source of material and of bioenergy. Afterwards we will discuss the prerequisites for the production of biomass rooted in the Land Use, Land Use Change and Forestry (LULUCF) as well as the agricultural policies. The chapter will end with addressing the specific legislation concerning where one is allowed to plant an SRC and under which conditions in Flanders and Wallonia.

Level	Land Use (where)	Production of (SRC) biomass (how)	Processing of biomass (end product)
EU	Regulation on LULUCF		
	Forest Strategy		
	Common Agricultural Policy		
		REPowerEU	
			Fuel Directive
	Renewable Energy Directive		
National	National plan on Energy and Climate		
Flemish	Veldwetboek		
	Natuurdecreet		
	Pachtwet		
	Bosdecreet		
	Gemeenschappelijk Landbouw Beleid		
		Mestdecreet	
		Energiedecreet	
		Materialendecreet	
Wallonian	Code du Développement Territorial		
	Politique Agricole Commune		
	Arrêté du Gouvernement wallon du 24/02/2022, p. 16437 (Énergie)		

Figure 2.1: Policy initiatives and legislation affecting the planting and management of SRC as well as its end products.

are exempt from the incineration ban, even though these materials are recyclable. This is to leave room for renewable energy production (Wille, 2016). Wood from SRC is not considered as waste and thus exempted from this incineration ban. In Wallonia, the same cascading principle is acknowledged by the "[Comité transversal de la Biomasse](#)" which is a committee that is finalizing the Walloon biomass strategy "*Bois-Energie*". However, also in Wallonia deviations from this cascade are allowed when justified.

2.2 BIOENERGY POLICIES

The European policy on renewable energy is mainly captured in the *Renewable Energy Directive* (RED). The first Directive was published in 2009 (European Parliament & Council of the European Union, 2009a). This was revised in 2018 (European Parliament & Council of the European Union, 2018a) (RED II) and is now in the process of a second revision (RED III). This new revision was proposed by the European Commission in 2021 and is expected to be adopted by the Council and Parliament in 2022 (European Commission DG for Energy, 2021). More recently, in May 2022 the Commission proposed its REPowerEU plan, as a reaction to the energy crises.

In RED III, the European Commission has proposed a new goal for reducing greenhouse gas (GHG) emissions by 55% by 2050 compared to the 1990 baseline. To do this, it relies on increasing the share of renewable energy to 40%⁹. In the REPowerEU plan, 45% renewable energy is proposed. The EU is also counting on woody biomass to meet these renewable energy targets. In this new plan there is also a heavy focus on renewable gas in the form of methane, sourced from sustainable (local) biomass feedstocks (European Commission, 2022).

The transport sector must also reduce emissions, and the 2009 *Fuel Quality Directive* (European Parliament & Council of the European Union, 2009b) stipulated that the GHG intensity of transport fuels had to be reduced by 6% by 2020. To this end, biofuels were considered as a part of the solution. More recently and also specifically for the transport sector, it was set in the 2018 RED II that the minimum share of renewable energy in final consumption must be at least 14% by 2030, RED III proposes a 2.2% share of advanced biofuels and biogas in the transport sector by 2030.

Nevertheless, it has been acknowledged since the 2009 RED that the use of biofuels (and using the same reasoning biomass for energy purposes as a whole) does not always lead to GHG emission reductions and can also have undesirable effects such as the loss of biodiversity. This is mainly the case for biofuels made from food and feed crops. Article 26 of the RED II therefore establishes the phasing out of biofuels from food and feed crops that have a high risk of indirect land use change with a significant expansion of the production area into high carbon stock land. In addition, there are several sustainability criteria coupled to the use of biofuel from agricultural biomass. It may not be produced from raw materials obtained from land with high biodiversity

⁹ As a reference, in the RED II these figures were set at 40% emission reduction and 32% renewable energy (European Union, 2018).

2.3 LAND USE, LAND USE CHANGE AND FORESTRY POLICIES

Relevant policy documents on Land Use, Land Use Change and Forestry (LULUCF) include *Regulation 2018 on LULUCF* (European Parliament & Council of the European Union, 2018b), the *Forest Strategy* and the provisions of the Energy Decree already mentioned in the previous paragraph. In Regulation 2018 on LULUCF each EU Member State commits to ensuring that greenhouse gas emissions do not exceed removals, during the periods from 2021 to 2025 and 2026 to 2030, from land use, land use change and forestry. In 2021 the European Commission proposed a revision of this regulation in line with the Fit for 55 package (European Commission, 2021a). It proposed to set out an overall Union target of net GHG removals in the LULUCF sector of 310 million t of CO_{2e} in the period of 2026 to 2030. Combined with the goal to decrease the overall greenhouse gas emissions, it is calculated that the European forests should take up 90 million t of CO₂ by 2050 (Grassi *et al.*, 2021). In this respect, it is important to increase the net annual increment of the current forests, which can most easily be done by simply harvesting less. Moreover, the *Forest Strategy* aims to improve the quantity and quality of EU forests. The EU also pledges to plant 3 billion new trees by 2030.

2.4 AGRICULTURAL POLICIES

The Common Agricultural Policy (CAP) is one of the biggest European funding schemes. In short it aims to support farmers and ensure a stable supply of affordable food. The CAP was expected to be reformed in 2021 but this was delayed until 2023 because of the launch of the *European Green Deal*. However, in December 2021 an agreement on the reform of the CAP was formally adopted, meaning the budgets have been assigned and divided. Each member state has submitted their proposal for their national CAP strategic plan on 31 December 2021. A transitional regulation extends most of the existing CAP rules until 2023 and has some additional elements for the transition towards the new CAP.

Within the *European Green Deal* there is a renewed interest in connecting forests and nature with agriculture. This is expressed, among other things, in the mentioning of agro-ecological farming practices, payment for ecosystem services, agroforestry and carbon farming in both the *Forest Strategy* and the *Farm to Fork Strategy*. The CAP was aligned with this strategic document and within the budget of the 2023 - 2027 CAP 25% of direct payments, also known as the first pillar, is earmarked for the support of eco-schemes (European Commission, 2021b). Within the current Flemish and Walloon CAP, greening in agriculture is also supported (Departement Landbouw & Visserij, 2021a). It is even mandatory for farmers to apply greening practices if they receive the basic payment (direct payment under the first pillar). These greening practices include the establishment of ecological focus areas. This must be at least 5% of the arable land area if the farmer has more than 15 ha of arable land. Ecological focus areas also include planting of woody elements, agroforestry, SRC and wooded farmland. To qualify for being part of the ecological focus area, the rotation length of the SRC, in line with the legislation of the Flemish Forest Decree (see further), may not exceed 8 years. Additional restrictions are the choice of species. Only the following species are allowed (Departement Landbouw & Visserij, 2021a):

- Black alder (*Alnus glutinosa*)

article 21). Should the rotation length of the SRC be more than 8 years, it becomes a regular coppice forest which is legally a forest, regardless of the zoning destination it is planted in.

But what are these Spatially Sensitive Areas? The “*Vlaamse Codex Ruimtelijke Ordening*” (Flemish Codex on Spatial Planning) states in Article 1.1.2, 10°, that the SSA’s are the following areas, designated on development plans¹²:

- 1) agricultural areas with ecological importance
- 2) agricultural areas with ecological value
- 3) forest areas
- 4) spring areas
- 5) green areas
- 6) natural areas
- 7) nature reserves with scientific value
- 8) nature development areas
- 9) nature reserves
- 10) flood plains
- 11) park areas
- 12) valley areas

As well as areas designated on spatial implementation plans and sorted under one of the following categories or subcategories of area designation:

- 13) forest
- 14) park area
- 15) reserve and nature
- 16) the Flemish Ecological Network (VEN), consisting of the area categories Large Nature Units and Large Nature Units under development, mentioned in the Decree of 21 October 1997 on nature conservation and the natural environment
- 17) the protected dune areas and the agricultural areas important for the dune area, designated pursuant to Article 52, § 1, of the Law of 12 July 1973 on nature conservation

Some of these vulnerable areas are also subject to the “*Mestdecreet*” (Manure Decree) and if an SRC is planted in these areas, it may not be fertilised except by direct excretion through grazing. This concerns agricultural land situated in areas designated on regional spatial implementation plans (gewestelijke ruimtelijke uitvoeringsplannen) under the category of

- 1) forest
- 2) reserve and nature

as well as land as indicated on plans adopted by the “*Decreet betreffende de ruimtelijke ordening*” (Decree on spatial planning)

- 1) non-intensive grassland in forest areas
- 2) agricultural land in nature reserves

¹² These are the “*ruimtelijke uitvoeringsplannen van gewest, provincie of gemeente*” as well as “*bijzondere plannen van aanleg*”



need for extra permits under the Nature Decree, unless the SRC has a rotation less than 3 years, which would exempt it from the Forest decree regulations.

Another hurdle for managing SRC specifically on leased agricultural land is the "*Pachtwet*" (Leasing Law). This law limits the possibilities of planting and managing woody elements on leased lands and on lands that have been taken out of lease recently. Article 28 states:

- *The tenant may not carry out any new planting of trees unless with the written consent of the lessor. Nevertheless, planting necessary for the preservation of the property and, except in the case of valid termination, planting to replace dead or felled trees and those of low trunked fruit trees is allowed without the consent of the lessor.*

Moreover, even with the consent of the lessor, compensations can be demanded at the end of the coppice rotations because of changes in value of the agricultural land:

- *Where a planting authorised in writing by the lessor or carried out regularly in accordance with the foregoing provisions has resulted in an increase in the value of the leased property and the lease terminates on the initiative of the lessor before the planting reaches the age of eighteen years, the lessee shall be entitled to a payment equal to that increase in value; if the lease ends on the initiative of the lessee, that compensation shall not exceed the total rental paid by the lessee during the last five years for the total of the goods leased by him from the same owner.*
- *Where such planting has led to a reduction in the value of the leased property, the lessor shall be entitled to receive from the lessee compensation equal to that reduction in the value.*

The possibility of this clause to be relevant is real since the SRC cultivation practices often result in higher soil quality because of better porosity, higher amount of soil carbon, higher soil biodiversity and less erosion (see section 4.1.1 Soil).

Article 10 of the leasing law also stipulates that a lessor may withdraw the lease of the land, after the expiry of the lease period, provided that he exploits the land himself for the following 9 years. However, this may not be with deciduous trees, conifers or shrubs. Therefore, if an SRC is considered as forestry rather than agriculture, this may pose a problem.

The "*Veldwetboek*" (Field Code) also contains provisions related to the planting of woody vegetation. For example, Article 35 states for neighbouring parcels:

"High-stemmed trees may only be planted at a distance determined by established and recognised custom; in the absence of such custom, high-stemmed trees may only be planted at two metres, other trees and living hedges only at half a metre from the dividing line between two yards"

In article 35bis §5 we read a specification of these rules for agricultural zones:

"In the parts of the territory reserved for agriculture, the planting of trees is forbidden at a distance of less than six metres from the dividing line between two properties; in addition, a permit from the Municipal Executive is required."

And it is clarified that the same provisions apply on the area designated for forestry, along the area designated for agriculture. In Flanders, however, there is an additional provision that says:

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"The provisions of the first paragraph (Article 35a) do not apply to land use systems where the cultivation of trees is combined with agriculture on the same land, applied to a plot of agricultural land"

This implies that for agroforestry¹³, no distance rules apply. It is unclear, however, if SRC also falls under this exemption as it is no combination of agriculture but a crop itself.

If the planting of SRC is in SSA then it is officially a forest falling under the Forest Decree and must therefore have the afforestation permit and respect the distance rules. This is not the case for vSRC. If the (v)SRC falls outside the SSA, however, it is considered agricultural and no afforestation permit needs to be applied for, nor do the distance rules need to be respected (probably).

Independent of the Forest or Nature Decree or the Field Code, an SRC can still be subject to additional rules when the landscape is classified as immovable heritage. The *Heritage Decree* states in article 4.1.10 that when there is a felling of immovable property, included in the established inventory of woody plantations with heritage value, this must first be approved by the Heritage Agency. The very intensive and automated SRC has not become established in the Flemish landscape and the chance that a new plantation will therefore be located in a protected landscape and have heritage value is small. Nevertheless, it is always best to check whether the plot to be planted is not protected under this decree.

2.6 WALLOON LEGISLATION CONCERNING SRC

In Wallonia, two definitions of SRC can be found in legislative documents. The first in the Code du Développement territorial (CoDT) which talks about an Intensive cultivation of forest species in Art. R.II-36-4. These are permitted in the zones destined for agriculture on the following conditions:

1° it aims at the production of biomass or energy wood, and consists in covering with trees for a period of less than 12 years, by planting or by letting the vegetation develop for a period of less than 12 years, by planting or by allowing vegetation to develop, a property or part of a property not previously covered by trees;

2° the project is located on land adjacent to an existing woodland, grove or forest, or to a forest area included in the sector plan, unless the area to be afforested is greater than three hectares in one piece;

3° the project is not located within the perimeter of an outstanding viewpoint referred to in article D.II.21, § 2, 1°, or of landscape interest referred to in Article D.II.21, § 2, 3°;

4° the project does not involve any modification of the ground relief or drainage

5° when the intensive cultivation of forest species is stopped, the site is returned to its agricultural use.

¹³ Defined in the Forest Decree as "land use systems in which trees are grown in combination with agriculture on the same land, applied to an agricultural parcel"

is often exploited by a specialised company, an agricultural service provider¹⁵. This company will do the harvesting and may or may not execute the transport to the processing company or hire a transport company themselves. The processing of SRC wood currently mainly encompasses the use as solid fuel or for composting. However, with evolving and emerging technologies, the wood could also be used as material and other, yet to be determined uses/sectors. This will put them in competition with the bioenergy and composting industry. The finished wood products, compost and also the energy generated from woody biomass enter the market through traders.

The entire production chain naturally influences each other through the market rules of supply and demand. This is partly determined by the consumer and influenced by the international market and policy choices, as mentioned in section 1.2. The international market in itself is also influenced by policy on a European and national level as there is a demand for carbon-neutral technology. At the same time new technologies also emerge, creating new opportunities for the international market which will translate in different supplies (increased supply because of new selection and breeding technology) and demands (new technology making wood from SRC a viable feedstock for various applications).

B) Stakeholders affected by the production and processing of SRC

The whole production and supply chain has an effect on people that live within the landscape where the chain operates. The choices of the landowner and the service provider determine how the landscape is impacted. The appearance and structure of the landscape affects inhabitants of this landscape, farmers who operate in the landscape, recreationalists as well as hunters. The management operations of the plantation (e.g. harvesting) and the transport influence the perception and quality of the immediate living environment. Heavy transport is for example often a concern of the local inhabitants (Mohr & Raman, 2015).The industries themselves also have a direct impact on the neighbouring communities. Construction and operation of industrial-sized plants and factories are often opposed by local communities (Dandy, 2010). It should also be noted that these industries, as well as the transport and service provider can provide jobs for the local inhabitants. Ultimately, the whole idea behind the production chain is that the goods and services reach society, which is also a form of influence but is not limited to people living within the landscape. Rather, this influences society as a whole.

C) Stakeholders influencing the production and processing

Policy sets the context within which the production chain can operate. As referred to in chapter 2, there are multiple policies that regulate the production and use of SRC. The policy makers that are not present in the landscape (European, national, regional, and sometimes also cities and municipalities) put into place regulations on the use of materials, bioenergy, land use, agriculture and forestry. They set the context within which SRC can be planted, managed, funded and for what its wood can be used.

The policy context is operationalized by context setters within the landscape who set specific rules and check the compliance. The Agency for Nature and Forest (ANB/DNF), the department of agriculture and the local/municipal government are the main executive stakeholders who

¹⁵ The choice was made to use the term agricultural rather than forestry service provider as SRC is more often exploited with agricultural machinery than with forestry machinery in Belgium.

check compliance with regulation for SRC. ANB grants permits of the Forest Decree, Nature Decree, the department of agriculture and the *Vlaamse Landmaatschappij* (VLM) determine and check compliance with agricultural policy such as ecological focus areas, the Leasing Law and the Manure Decree. The urbanism permits necessary in Wallonia are granted by the SPW Aménagement du territoire et urbanisme. Nonetheless, also other organisations are involved such as the Forest groups (Bosgroepen) and cities and municipalities for certain permits and procedures. The Regional landscapes in Flanders acts as an intermediary between policy, civil society, municipalities, government institutions and the production chain. While this role is taken up by different organisations Wallonia such as ValBiom (Valorisation de la biomasse), AWAf (Association pour l'agroforesterie en Wallonie et à Bruxelles), CTA de Strée (Centre des Technologies Agronomiques de Strée), CDAF (centre de Développement Agroforestier de Chimay), NatAgriWal.

The affected people within the landscape can indirectly influence the production chain. They can do this in three ways. First they can influence policy directly through their voting behaviour. Different parties have different priorities and visions for the landscape and the economy and will therefore potentially put other policy measures in place. Secondly they can get directly involved in the production chain by communicating with and expressing concerns, or in more drastic ways such as opposing permits. Thirdly they can organise themselves in civil society organisations. These organisations have more leverage to directly influence policy and can even take measures into their own hands and perform research, buy land and talk to stakeholders within the production chain.

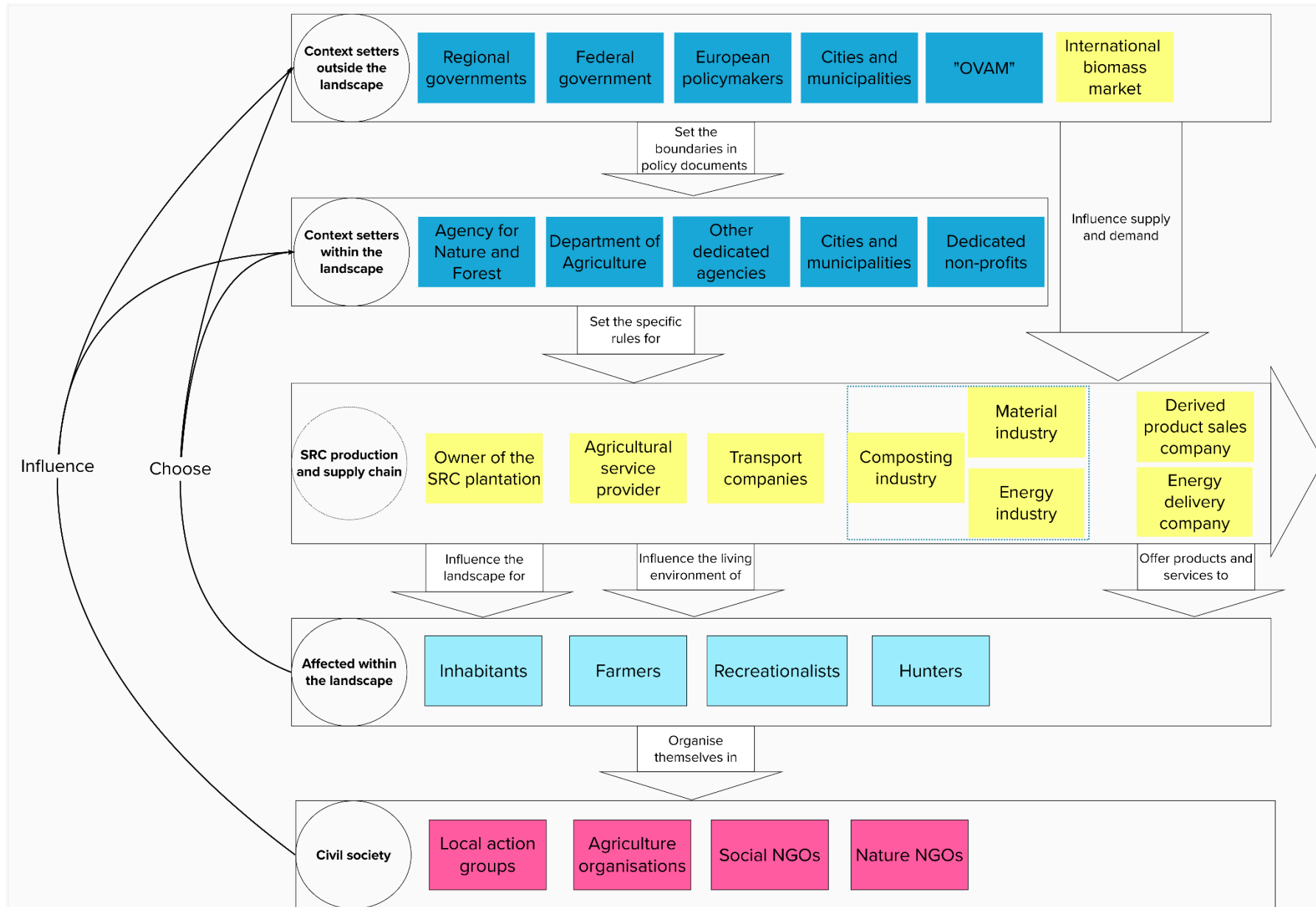


Figure 3.1: Stakeholder analysis of the SRC biomass production chain



4 DIRECT EFFECTS OF SHORT ROTATION COPPICE

Introducing a new land use in an existing landscape impacts the local natural and social system that was already present and often also has indirect effects on natural and social systems outside the local landscape through telecoupling effects. For SRC this is no different. On a local scale it will impact the amount of biodiversity that is already present and which could potentially be present in the future. It also affects the local biotic and abiotic determinants and thereby the functioning of the ecosystem.

People benefit from certain services of nature to society through the functioning of the ecosystem. Altering the ecosystem will possibly alter the functions and therefore possibly also the services to society. The difference in supply and possibly also in demand of these services will impact the local society and the local economy. Through displacement effects or other interactions, the change in local land use can also have effects on the functioning of ecosystems and the society and economy around it, elsewhere. This is mainly the case when the new land use is introduced on a large scale. For SRC this is an unlikely scenario and the focus of this report is on the direct effects that will mainly have a localised (regional, national) impact. Nonetheless we will briefly explore possible effects of the large-scale use of SRC in Belgium in chapter 5. In this section we will first analyse the delivery of ecosystem services and the possibility of SRC to support biodiversity. Secondly we will analyse the impact on the local economy, to end with the impact on the local social system. Nonetheless, it should be noted that these three are inextricably linked and many of the impacts will be highlighted in different ways throughout this chapter.

It is important to note that we are scoping the existence of possible impacts without discussing the probability or order of magnitude of the impact as this will mostly depend on the scale and form of implementation.

4.1 ECOSYSTEM SERVICES AND BIODIVERSITY OF SRC

On virtually every level, SRC has a smaller ecological impact than agriculture, but a larger impact than a forest. This means that when arable land is converted to an SRC plantation, or SRC is integrated into the arable land, this is associated with ecological gain, whereas when a forest has to make way for SRC this is associated with ecological loss. This is because SRC is a less intensive system than conventional agriculture. There is less or no fertilisation, less or no pesticides are used, there is less (soil) disturbance and a longer soil cover, it can therefore be regarded as more environmentally sustainable than conventional agriculture. Integration of SRC into arable land will have a part of the ecological benefits while simultaneously avoiding substantial losses in agricultural output. This can prove to be the most environmentally sustainable production method under certain circumstances. The environmental impact is often viewed from an anthropocentric angle and expressed in terms of changes in the delivery of ecosystem services (ES). Table 4.1 gives an overview of the relevant possible contributions of SRC systems to the delivery of ecosystem (dis)services with corresponding colour code for



Nevertheless, the overall effect of SRC introduction can also have a negative impact on biodiversity (Fehér *et al.*, 2020; Njakou Djomo *et al.*, 2015b; Pedroli *et al.*, 2013; Whitaker *et al.*, 2018). For example, an SRC plantation could occupy a field that was being used for food production, thus causing another piece of land, possibly with a high biodiversity value to be taken into production elsewhere for growing food (indirect land use change or ILUC). Also, an increased demand for biomass could cause forests to be replaced by SRC, which would lead to a loss of biodiversity¹⁶. These aspects are covered more in-depth in chapter 5. Dochy concluded in 2011 that introducing SRC in an open agrarian landscape in Flanders where specialized agrarian meadow and field birds find their habitat, would be detrimental for their populations. Therefore SRC should be restricted to already fragmented landscapes which have little value for these bird species that are under pressure in Belgium.

In conclusion, biodiversity is mainly higher in extensive, small-scale and heterogeneous SRC plantations that are cleverly built into an agricultural landscape to connect the fragmented nature. Care should be taken that it is only planted on marginal land without nature value or that it replaces intensive arable farmland. However, these rules of thumb are not indisputable and it is therefore advisable to evaluate each case individually. It should of course be noted that an increased attention for nature conservation might result in a decreased direct economic gain. This will be discussed more in-depth in section 4.2.

4.1.3 Water

SRC influences the local water quality and quantity. Due to its extensive root network and strong nitrogen and phosphorus absorption, SRC is excellently suited to purify wastewater (De Somviele *et al.*, 2009). It can also serve as a buffer next to a field to catch the runoff and leaching of fertilisers to prevent it ending up in the watercourses (Meiresonne, 2006). This can be especially interesting in the Belgian context where eutrophication of watercourses is a major issue.

However, SRC has a high water consumption. The total water consumption is highly dependent on local factors such as soil type, precipitation, age, species and genotype (Bloemen *et al.*, 2017; Busch, 2009; Dimitriou *et al.*, 2011). In some cases, evapotranspiration is as high as for conventional agricultural crops (Bloemen *et al.*, 2017; Fischer *et al.*, 2018), in some cases it is higher (Dimitriou *et al.*, 2011). Meiresonne (2006) calculated the total water consumption of a poplar SRC to be 600 mm per year at an annual average precipitation of 700 mm, which is higher than for grassland, arable land and deciduous forests. This high water consumption continues even during dry periods, which can disrupt the local water cycle and cause problems for neighbouring crops. On top of this, SRC can cause lower groundwater recharge compared to agricultural land. This is due to its dense network of roots and higher water retention (Lupp *et al.*, 2015). On the other hand, SRC from willow (and to a lesser extent poplar) can be very interesting in wet areas where agriculture is not possible. These species tolerate a high water table and even temporary flooding (Meiresonne, 2006). A wet area can thus also be drained by an SRC and limit flooding or mosquito nuisance. Although there are advantages and

¹⁶ In Belgium this is theoretically impossible because of legislation protecting forests and high biodiversity land.

disadvantages of SRC water use on a local scale, in wetter areas (>550 mm per year; for comparison, Belgium has around 800 mm per year) there is unlikely to be a significant effect on river basin hydrology (Bloemen *et al.*, 2017; Busch, 2009; Dimitriou *et al.*, 2011).

4.1.4 Agriculture

SRC can support agriculture but can also compete with it. Bordering fields, SRC offers a breeding ground for natural enemies of pests that can affect agriculture (Verheyen *et al.*, 2014). In addition, it is also an effective windbreak which can protect fields or livestock from strong or cold winds. The shade provided by the trees during the later stages of the cycle can be important for cattle in summer. On the other hand, there is of course a loss of crop production due to that same shade. Also, in addition to pest controlling species, the SRC may harbour pest or invasive species that affect nearby agricultural areas or allergenic and toxic species that can harm animals and humans (Fehér *et al.*, 2020).

The herb layer of SRC may contain crops that can serve as food or medicine for humans and animals (Fehér *et al.*, 2020). This can be an unintentional, but welcome side effect or it can be intentionally exploited in the form of agroforestry. This has already been shown to have mutual benefits for SRC in combination with poultry (Vervisch & Verdonck, 2015). On the other hand, the SRC also offers a potential habitat for game (Cornelis, 2015). This game can cause damage to agricultural crops, but is also an important cultural and economic service for hunting. Damage by wild animals can partially be avoided by planting linear plantations instead of whole parcels as this will create less shelter for the animals (ValBiom, personal communication, September 23, 2022). It is also clear that SRC can often compete directly or indirectly with other agricultural production in terms of land use (Njakou Djomo *et al.*, 2015b), this is especially important in Belgium where space is limited and agricultural land is already under constant pressure. Nonetheless this can also be to a large extent mitigated by integrating SRC in the agricultural parcels as field borders or alleys, on marginal land or on land that was formerly used for phased out crops such as first generation biofuel crops and feed crops.

4.1.5 Environment

SRC offers advantages and disadvantages for a healthy living environment. Like any plant, the trees in SRC plantations absorb fine dust and other pollutants and thus purify the air. Because of its higher roughness and larger leaf area, an SRC will do this to a greater extent than conventional agricultural plants. In addition, they also cool the environment, which is also directly related to the leaf area. On the other hand, willow and poplar have high isoprene emissions (Beltman *et al.*, 2013). This isoprene contributes to the formation of tropospheric ozone. For example, a conversion of 5% of grassland in Europe to poplar plantations for biomass could result in an increase in ozone indicators of health damage and vegetation damage by 25% and 40% respectively.

4.1.6 Carbon cycle

SRC plantations are net carbon sinks (Don *et al.*, 2012; Horemans *et al.*, 2019; Li *et al.*, 2018; Njakou Djomo *et al.*, 2015a, 2015b). As any plant, the trees in an SRC capture carbon dioxide



from the air and store it in their tissue. This is also transferred to and stored in the soil. Underground carbon storage is calculated at 0.44 t soil C ha⁻¹ year⁻¹ (Don *et al.*, 2012). It remains in the soil as long as it is not disturbed, thus contributing to the reduction of greenhouse gases in the atmosphere and to the improvement of soil quality. Due to a reduced use of fertiliser in comparison with conventional agriculture, there is very little N₂O production. Methane production is mainly influenced by the groundwater table, with waterlogged events meaning a production peak of methane. Since the water table can be lower at SRC than in agriculture due to increased water use, the methane production could be expected to be lower in some circumstances (Horemans *et al.*, 2019). However, other studies indicate that there is no real difference (Drewer *et al.*, 2012). Nonetheless, SRC is generally a net absorber of greenhouse gases, in contrast to conventional agricultural land. The aboveground biomass will be harvested and captured carbon eventually be released back into the atmosphere through conversion to energy. Nevertheless, energy from burning wood from SRC instead of fossil fuels is an environmental benefit as it emits 8 to 114% less greenhouse gases than energy from fossil fuels (Njakou Djomo *et al.*, 2015b). In terms of energy, a poplar SRC plantation was calculated to produce 7.9 times more energy than it consumed from cradle to plant gate in Belgium (Dillen *et al.*, 2013).

To summarise:

SRC has a significant potential to increase the diversity within an agriculture-dominated landscape. Moreover the neighbouring agricultural plots can benefit from its natural protection. SRC is capable of restoring degraded agricultural soils. If planted on degraded soils, there will be a net sequestration of GHG within the soil. The biomass can generate energy (much) more greenhouse gas efficiently than fossil fuels. SRC can also be used to remedy waterlogged sites or as phytoremediation for contaminated soils.

Nonetheless, care should be taken when planting SRC. It should not replace forests, which can support more biodiversity and store more carbon both above- and belowground. Highly biodiverse environments or soils with a high carbon content like permanent grasslands should also be avoided. Wide open agrarian zones that serve as habitat for endangered field- and meadow birds are best kept open and therefore free of SRC. In general SRC should not be planted on too large scale as this might affect the local water availability, could contribute to higher ozone concentrations and the benefit of landscape heterogeneity would be lost. The impact of the SRC on neighbouring agricultural plots should be monitored as game damage or pests and diseases could pose problems.

To maximise the environmental benefits of SRC, it should be planted as small and heterogeneous patches, as field borders or as alleys which are well placed within the landscape connecting other natural elements, protecting agriculture and watercourses. It should be planted with care for biodiversity and soil carbon and managed heterogeneously in time and space as to always provide habitat for species. Including cover crops, permanent bushes or trees, ponds and other natural elements will lead to higher biodiversity gains. Reducing inputs such as fertilizers and phytosanitary products will result in higher environmental gains.



4.2 THE ECONOMICS OF SRC

As there is only a very limited number of SRC plantations in Belgium, only a few economic feasibility studies have been performed (El Kasmioui & Ceulemans, 2012, 2013; Meiresonne, 2006). Apart from these studies, we also performed a series of 9 interviews with experts on SRC or woody biomass in general. The interviews focussed on the feasibility and effects of SRC in Flanders, where the economic aspects were also reflected upon. Previous studies and the interviews showed that with the current information, it is hard to generalise the financial feasibility of SRC. Therefore we will, in this section, elaborate on the factors that influence the feasibility, rather than making a fictive calculation.

We will approach the economics of SRC in three different parts. First by looking into the basic production costs of wood from SRC and the price one gets for selling it. Second by looking at the benefits and costs of a private actor. And lastly by looking into the costs and benefits of a public investor. A private actor or investor is expected to mainly try to maximise monetary profits, whereas a public actor or investor also needs to take into account other goods and services or trade-offs that arise from SRC production. Therefore these two investors are analysed separately.

4.2.1 The financial balance of SRC production

The main factors determining the production cost of SRC are:

1. The price of the (agricultural) land:

In Flanders the pressure on agricultural land is high and increasing. Encroachment, speculation and investment in agricultural land further drives up the prices (Departement Landbouw & Visserij, 2021c). A Belgian farmer paid on average €310/ha lease in 2021. In Flanders this was as high as €391/ha with large regional differences, West-Flanders being the most expensive with €471/ha.

2. The establishment of the plantation:

This includes soil preparation, application of pre- and/or post emergent herbicides and planting. This has been calculated to be 16% of the total costs over a time span of 21 years (7 rotations) (El Kasmioui & Ceulemans, 2013). Planting was the biggest single cost, with estimates of the planting material being €1.200/ha for a planting density of 15.000/ha (Meiresonne, 2006) and the planting operations ranging from 450 to €1000/ha (El Kasmioui & Ceulemans, 2013; Meiresonne, 2006). More recently the price for planting was reported by a Belgian company to be minimum €3500/ha (O. Poncin, personal communication, May 14, 2022).

3. The maintenance of the plantation:

This includes weeding, possible fertilisation and emergency phytosanitary measures. For a plantation where only weeding was performed, these costs were only 2% of the total costs (El Kasmioui & Ceulemans, 2013). When sanitary measures need to be taken, this can add up to around €130/ha per year, not including the labour cost (De Somviele *et al.*, 2009).

4. Harvesting and possibly chipping:



This is the highest cost of the cultivation, amounting to 45% of the total costs during the lifespan of the plantation (El Kasmioui & Ceulemans, 2013). However, it heavily depends on the type of harvester used, from where the machine has to come and how efficiently it operates. Berhongaray et al. (2013) reported prices ranging from 388 € ha⁻¹ to 541 € ha⁻¹ when comparing three different harvester and harvesting types in Belgium. A price of €275/ha was reported by a Belgian company (O. Poncin, personal communication, May 14, 2022).

5. Transport of the biomass:

This was calculated to be around €15 per oven-dry tonnes of chips for a distance of 50km (El Kasmioui & Ceulemans, 2013). Which is about 15% of the price one would get for oven-dry chips (De Somviele *et al.*, 2009).

6. Drying of the chips:

As chips are harvested with a moisture content of at least 50%, they need drying before they can be efficiently converted into energy. When harvested as stems, they can be left on the field to dry. When directly chipped the drying requires either a place to stock the chips under an open roof on a concrete floor where convection will dry the heap to less than 30% moisture content (De Somviele *et al.*, 2009) or alternatively forced drying can be applied, which needs energy.

7. Removal of the stumps:

At the end of the final rotation of the coppice plantation, the stumps need to be removed, either to make place for a new plantation or to convert to another land use or crop. This is calculated to be between 550 and €1.700/ha (El Kasmioui & Ceulemans, 2013).

The total production cost for fresh chips sold at the farm gate (so without transport and drying) was calculated to be around €40/ton (El Kasmioui & Ceulemans, 2013).

The cultivation of SRC is, moreover, not without a risk. Because of the perennial nature, it is more likely to have some disturbance within its lifetime. When only a limited amount of genetic diversity is introduced in the plantation, it is more prone to diseases and pests. Both these factors can rapidly and dramatically increase the costs of the plantation and render the investment unprofitable. Moreover, when the choice is made to cultivate the whole area with the same schedule, the revenues of the cultivation are not coming in every year. This can hamper the normal functioning of an agricultural enterprise, especially if the land is leased and needs to be paid yearly or if loans are to be paid at a monthly basis.

In contrast to these high costs and relatively high risks, the price of biomass is low. Fresh chips can go as low as 20 to €30/ton (El Kasmioui & Ceulemans, 2013), whereas high quality oven-dry chips can be sold at around 100 - €120/ton¹⁷. However this is a very dynamic market and the chips could be valorised more in other sectors.

Another source of income from SRC could come from financial governmental support. However, in Flanders there is no special support for SRC yet. This would change with the new GLB (2023 - 2027) where the support would be €600 per hectare per year (Departement Landbouw &

¹⁷ Price obtained from personal communication with biomass companies before '22 energy crises.

- Flood prevention

In essence all the other ecosystem services, including the cultural services that will be discussed in section 4.3, should be taken into account, but most still lack the framework to quantify and monetize or are simply not monetizable (Fürtner *et al.*, 2022). Unfortunately the saying “we treasure what we measure” also applies to the environmental and social benefits, meaning that the benefits that are not readily translated into monetary values, are often overlooked. Nonetheless, already identifying them is a first important step towards acknowledging them in decision making at all levels.

4.2.2 The benefits and costs for a private investor

When looking at a private investment, mostly the financial gains are the determining factor. Other gains, such as increased biodiversity or delivery of ecosystem services or supporting a carbon-neutral economy might (or should) also be important criteria for private investors but here we will make the abstraction of the private investor to be solely interested in getting the best return on investment from a plot of land. Within this abstraction we can still subdivide the private investor in two categories. The first category is the farmer who can use his/her own farmland, machinery, labour, infrastructure and possibly even woodchips for private use. The farmer will only switch to SRC if this is more profitable than other land uses. The second category is the private enterprise that seeks to valorise its own undeveloped land but who cannot count on its own machinery, infrastructure nor can it use its own woodchips. Moreover, it will have to outsource all of its labour. The opportunity cost of the private enterprise, however, is mainly related to developing the area or leaving it under minimal management.

Benefits and costs for farmers

For a farmer it can be profitable to cultivate SRC, especially when the chips can be used on-farm. (El Kasmioui & Ceulemans, 2013) performed a financial analysis of an SRC plantation by a farmer in Belgium and concluded that the investment would be profitable after 21 years, meaning 7 rotations of 3 years. The profit was nonetheless rather limited with only 16,3 € ha⁻¹ year⁻¹. Studies from Germany argue that the key lies in proper land allocation (Busch & Thiele, 2015). The study calculated what percentage of arable land would be more profitable with SRC compared to a conventional cultivation (barley – barley – sugar beet rotation). This resulted in 35% of the agricultural land proving more profitable under SRC. Similarly, in the Sachsen region SRC ranged from very competitive to not competitive at all, depending on the local growth factors such as soil quality and water availability (Kröber *et al.*, 2015). El Kasmioui and Ceulemans (2012) concluded that SRC in Europe are not financially viable, unless a number of additional conditions were fulfilled, such as biomass price, yield and government support. When the chips are used on the farm itself, the profitability should be checked by comparing the production costs with the spared expenses from fuel for heating. A demonstration by Phitech on a Walloon farm indicated the possibility to substitute 100L of fossil fuels with a price of €60 with 1.3 cubic metres of fresh chips from SRC which could be produced at a cost of 10 to €20. According to their own calculations, one hectare of SRC could substitute 4000 – 6000L of fossil fuels and become profitable from the second rotation (Phitech, personal communication, October 22,

leading to indirect land-use change in other places. These possible telecoupling effects will be discussed more in-depth in chapter 5.

2. As SRC has no guaranteed (large) return on investment, public funds could have more impact when invested elsewhere. This should, of course, be carefully analysed as this could be very case specific.

To summarise:

The costs of planting and managing an SRC plantation is high compared to the price of the chips it generates. For a private investor the price of the biomass should (drastically) increase to make the investment worthwhile. The current energy crisis could temporarily lead to sufficiently high woodchip prices but a stable market is needed for the investment to be profitable during its whole lifetime. Farmers who can valorise the chips on site can profitably assign their less valuable land to SRC and save on expenses for fossil fuels or compost. This does, however, require a large investment cost for the heating installation. Public investors can more easily make long-term commitments and can take non-monetary aspects into account when analysing the costs and benefits. This will be in the advantage of SRC as it brings environmental benefits and provides a stable income of biomass for local energy production. Private investors could also be remunerated for these positive environmental and social effects by means of PES schemes.

4.3 THE SOCIAL DIMENSIONS OF SRC

A change in the landscape always has an impact on the people who are part of, or interact with that same landscape. In addition, changes in one location sometimes cause changes in other locations. Whether this change is experienced as positive or negative by the various stakeholders, has partly to do with the change in the delivery of ecosystem services that accompany this change and/or with the economic impact this change might have. How the change is perceived by a stakeholder will also depend on its values, needs and goals. It can be culturally bound or simply personal. It is, however, clear that the social dimensions of SRC will be closely related to changes in ecological and economic factors and this relationship should not be overlooked (Raman *et al.*, 2015).

In this section we will evaluate the social impact of SRC in a systematic way by evaluating how every stakeholder group, as identified in chapter 3, will be affected by the implementation of SRC on a significant scale. Since there is a large gap in literature on these aspects, and not every stakeholder group was consulted, the authors made deductions on possible current and future positions of stakeholders regarding SRC. These deductions are indicated in the text.

4.3.1 **The impact of SRC on actors in the biomass production chain**

The owners of the SRC plantations will gain income and the service providers together with the transport companies will benefit from more work in the local area, provided the financial balance of the plantation is positive. However, a large enough area should be planted with SRC for a plantation owner to invest in the necessary machinery, or alternatively enough plantations should be present within a certain area to make the transport of its machinery cost-efficient for service providers. Transport of biomass should also be minimised and done efficiently to avoid

landscape and the consequent impacts on aesthetic, cultural values and attractiveness for recreation. An extensive analysis on the optimal planning of SRC within the landscape has been done in the United Kingdom (Bell & McIntosh, 2001). They identify possible positive effects of introducing SRC into a landscape as it can be an interesting and dynamic geometrical element in the landscape which can create depth. However, there are also a number of potential risks to the landscape quality. SRC can be experienced as an intrusive element that blocks the view or sunlight in a landscape as its growth rate is much higher than that of a forest and the height exceeds that of agricultural crops. Moreover, when planted in large homogeneous strips, it becomes a very dominant element in the landscape. The constant change in the landscape, going from a bare plain to a young forest in the matter of a few years can also be experienced as a negative impact. Table 4.2 provides specific guidelines for implementing SRC in the landscape, according to landscape type, as constructed by Bell & McIntosh (2001). The table was adapted with images from Belgium. Even though every landscape has opportunities to accommodate SRC without causing negative visual effects, lowland landscapes with high levels of tree and woodland cover in combination with arable or mixed farming, have the most potential. This was also confirmed by Boll et al. (2015). Next to roads, houses, monuments or viewpoints, SRC should be avoided or carefully planned in terms of distance, orientation, variations in cutting cycles and integration of more permanent structures such as shrubs or trees.


For recreation, the landscape impact will probably be the most determining factor. However, no studies have been done to assess the recreational value of SRC. Linear SRC could be seen as a form of agroforestry, which was shown to have positive recreational values (Borremans *et al.*, 2018)

Local farmers can benefit from their own or neighbouring SRC plantations (see Section 4.1), but they can also feel threatened because of a new possibly competing land use or because they can experience negative effects on their own production. Even though the effects of agroforestry are already studied in-depth and disseminated in Flanders such as through the project Agroforestry Vlaanderen and its follow-up project Agroforestry 2025, the same cannot be said for SRC. In essence, farmers often have very little interest in growing woody crops on their fields as was also concluded by Meiresonne in 2006 and little has changed since as can be seen by the evolution of SRC in Belgium in section 1.3. There are several economic reasons for this:



- The current market for SRC is practically non-existent as a result of which it is difficult to find an outlet for the wood produced.¹⁹ (Meiresonne, 2006; Zyadin *et al.*, 2017)
- It is usually less economically profitable compared to agricultural crops. (Fürtner *et al.*, 2022; Meiresonne, 2006)
- It is costly and requires heavy intervention to till or remove the root system of the SRC when the land is put back into agricultural production. (Meiresonne, 2006)
- Farmers fear that there will be more game damage as a result of the additional habitat and shelter provided by the SRC. (Meiresonne, 2006)

¹⁹ Although this reason might be outdated or stem from a lack of knowledge of farmers of how and where to sell woodchips or lacking own heating installations rather than actual missing markets.


Table 4.2: Landscape types and their sensitivity towards SRC and potential strategies to cope with them. Table according to Bell & McIntosh (2001) adapted with images from Belgium (copyright Vildaphoto)

Landscape type	Characteristics	Landscape sensitivity	Location and design considerations
<p>Enclosed</p> 	<p>Hedges and hedgerow trees create a pattern more dominant than the landform.</p> <p>Significant woodland cover interspersed with fields.</p> <p>Relatively small scale, short to medium distance views.</p> <p>High visual and ecological diversity.</p>	<p>Trees and hedges restrict visibility.</p> <p>Most sensitive locations may be along roads, paths or next to houses.</p> <p>SRC may be well concealed by field boundaries.</p>	<ul style="list-style-type: none"> - Plant at field scale. - Regular field scale harvesting in rotation will maintain diversity within landscape. - There may be opportunities to enhance gappy hedges and plant additional trees within the hedgerows, during the life of the SRC crop.



Landscape type	Characteristics	Landscape sensitivity	Location and design considerations
<p>Open with flat topography</p> 	<p>Few enclosing features. Landscape scale is large.</p> <p>Visual diversity is low.</p>	<p>Extensive views across open land may mean that SRC has a low visual impact if it occupies middle or background views.</p> <p>Landscape has the capacity to absorb extensive areas of planting.</p>	<ul style="list-style-type: none"> - Large scale planting is appropriate, with rotational harvesting also in large units, forming an interlocking pattern. - Reduce the scale of harvesting units towards edges to enhance visual interest. - Include and maintain strategically sited open areas along edges to provide a sense of depth. - Link with small scale woodlands and other features in the landscape, where present.
<p>Open with undulating and rolling topography</p> 	<p>Landform is dominant.</p> <p>Few enclosing features.</p> <p>Landscape scale medium to large.</p>	<p>Capacity to absorb medium to large scale planting linked to landform shapes.</p> <p>Views are controlled by height of undulations, may be extensive from vantage points, but otherwise limited.</p>	<ul style="list-style-type: none"> - Identify the main landscape features in the topography (ridges and low points). Aim to link planting pattern to them, where ownership allows. - Planting on lower lying areas will have lowest impact. - Aim for larger planting and harvesting units towards high points, decrease scale at lower elevations. - Plant bold interlocking shapes, using landform as a guide rather than the field pattern



Landscape type	Characteristics	Landscape sensitivity	Location and design considerations
			<ul style="list-style-type: none"> - Link into any established woods, where possible
<p data-bbox="163 440 241 467">Slopes</p> 	<p data-bbox="831 440 1189 539">Might contain woodland on lower slopes, associated with watercourses.</p> <p data-bbox="831 571 1133 639">The field pattern may be significant.</p> <p data-bbox="831 671 1133 699">Scale is medium to small.</p> <p data-bbox="831 730 1144 799">High ecological and visual diversity.</p>	<p data-bbox="1225 440 1525 539">Might be highly visible, especially from elevated viewpoints.</p> <p data-bbox="1225 571 1570 639">Highly sensitive to change if overlooked.</p>	<ul style="list-style-type: none"> - Identify existing features within landscape and link SRC planting to these, e.g. other woodland, watercourses. - Aim for irregular patterns of planting, e.g. staggered rather than obvious geometric blocks.



4.3.3 The position of civil society towards SRC

Local action groups

It is unknown how local action groups would react to SRC. To our knowledge, the largest plantation of SRC has been done by the POPFULL project of the University of Antwerp. Here 14,5 ha were planted, making it the largest plantation in the Benelux in 2007 (R. Ceulemans, personal communication, 2021). There was no public protest against this plantation. Nonetheless, people were worried about the possible use of genetically modified organisms (GMOs) in the plantation. Based on this case the authors argue that no local action groups are expected to oppose SRC when it is implemented with care for the landscape and when it does not substitute highly valuable (social or ecological) terrain or when it does not use contested methods/species such as GMO's (own deduction). Researchers also report a decreasing opposition against GMO field tests and increased interaction between the researchers leading the tests and the opposition groups (W. Boerjan, personal communication, June 16, 2022).

Environmental NGOs

Environmental NGOs have, in the past, opposed large scale biomass production as a source for energy and biofuels (Birdlife International *et al.*, 2020; Brachet *et al.*, 2018; Farkas, 2015; Swart *et al.*, 2021), but acknowledged the possible positive effects of small-scale decentralised biomass use (<https://www.natuurpunt.be/pagina/biomassa>). Their main concerns arise from a lack of GHG saving potential compared to fossil fuels, (in)direct land use changes causing biodiversity loss (by displacement effects) and, unsustainable harvesting practices, land grabbing, competition with other uses and fine particles emitted during the incineration of biomass causing pollution. Even though these concerns are mainly targeting first generation biofuels and the use of forest biomass for energy production, it can be expected that civil society will at least be sceptical about the use of SRC for bioenergy. This was also confirmed by an interview conducted with an actor from a civil society organisation in Belgium and by the study of Dandy (2010) on short rotation forestry²⁰. For SRC to gain the support of civil society, it will need to prove it is not prone to the same detrimental effects as the other biomass sources. This can be key as the stance of civil society can, to a large extent, influence the public opinion. This was also demonstrated during the recent revision of the European Renewable Energy Directive, where 38,000 out of 39,046 demands were made during the stakeholder consultation to exclude biomass as renewable energy and to limit its use to what is locally available as waste (European Commission, 2021c). This was the result of an organised action by several NGOs denouncing unsustainable practices caused by the large-scale use of first and second generation biofuels (Birdlife International *et al.*, 2020).

Social NGOs

Social NGOs are not expected to be within the direct sphere of influence of the SRC production system. Naturally, as SRC could possibly affect local job markets, local energy independence and national energy prices, they could become involved in a later stage (own deduction).

²⁰ Although this is a production system with longer rotations, we assume that stakeholder perceptions will be comparable.



Farmers associations

The official position of Farmers associations on SRC is unknown. There could be a certain interest as publications in *Sierteelt & Groenvoorziening* and *Landbouwleven* show, but there could also be scepticism because of possible substitution of arable land for SRC and changes in the conventional farming practices. Whereas individual farmers make decisions based primarily on their own interest, associations of farmers will look at the costs and benefits for the whole farming sector. Farmers in Flanders are under pressure of low market prices for agricultural goods and high production costs with an increased and suffocating upscaling as a consequence (Departement Landbouw & Visserij, 2021c; Dumortier & Vanhoven, 2021). Because of this upscaling, incentivized by government policies, most of the small landscape elements have been actively removed in the past 40 years to make larger plots for larger farms. With new policy interest in small landscape elements and ecological attention zones, SRC could be seen as a way to reinstate the former agricultural landscape in a profitable way. This could be achieved by planting SRC in between fields and bordering waterways, making up the obligatory 5% ecological attention zones of the arable land. The wood could be sold or used on site, depending on local infrastructure and market prices (own deduction). Nonetheless, as discussed in section 4.3.2, SRC could become yet another competing land use, increasing the prices of agricultural land and thus increasing the pressure on farmers. Additionally SRC might be perceived by the associations as unfitting within the current agricultural system or just not the responsibility of farmers, as was the case for the individual farmers in the study of Raman et al. (2015).

4.3.4 Local policy interest in SRC

Even though there are plenty of smaller-scale initiatives on biomass for energy supported or even initiated by local governments, SRC is often not considered. Most initiatives focus on the valorisation of wood that is already present in the landscape: “*Kempens energiehout*”, “*Loket onderhoud buitengebied*”, “*HOUT=GOUD*”, “*Limburgs groen voor een groene economie*”, “*Trees from Traffic*”, “*Houtige Biomassa*” and “*Stère*” from Energielandschap Oost-Vlaanderen,... Nonetheless, these initiatives result in biomass chains which can fairly easily be used for SRC wood chips as well. Should in the future SRC be more readily available, it is possible that there would also be an increased local policy interest (own deduction).

“*Agentschap Natuur en Bos*” and “*Bosgroepen*” which are respectively the regional agency for nature and forest and a non-profit organisation supporting Flemish forest owners with their forest management, reported to regard SRC as agriculture rather than forestry and therefore it lies beyond their scope. Nonetheless, they need to grant the permits necessary for compliance with the Forest Decree and the Nature Decree and are therefore important actors. SRC can best be planted neighbouring existing forests for the visual aspects and to connect forests to create more ecological value (Bell & McIntosh, 2001; Houghton *et al.*, 2016). In the light of reforestation and afforestation pledges on the European and Flemish level, this might scare potential SRC owners that have land next to forests as they fear it could be bought up by the agency in the near future as it will be a perfect plot to start the reforestation process or create natural corridors. The agency could potentially also be interested in supporting the transition in the biobased-economy by kickstarting the pledged reforestations with SRC or regular poplar

plantation which is an ideal preparation of the soil and microclimate (Thomaes & De Keersmaecker, 2011) and would yield biomass that consequently does not have to be harvested from our forests (own deduction). Even though this might be an interesting and potentially promising approach to conserving our current forests, it is rather unlikely that this will be considered as the expertise is lacking and normal reforestations would probably be more acceptable both for their own organisations as the broader public (own deduction). The Walloon counterpart of the nature agency is the Service Public de Wallonie (SPW) Agriculture, Ressources naturelles et Environnement. The urbanism permits are granted by the SPW Aménagement du territoire et urbanisme. Both are therefore also important actors but who seem to have no more interest in SRC as their Flemish counterparts do.

In Wallonia a number of non-profit organizations exist that promote the cultivation and use of woody biomass such as ValBiom (Valorisation de la biomasse), AWAF (Association pour l'agroforesterie en Wallonie et à Bruxelles), CTA de Strée (Centre des Technologies Agronomiques de Strée), CDAF (centre de Développement Agroforestier de Chimay), NatAgriWal. These are active in informing, educating and aiding interested farmers in developing their projects. Only ValBiom also has a clear interest in SRC but is mainly approached for miscanthus plantations (ValBiom, personal communication, 23/09/2023).

“Regionale landschappen” are non-profit organisations centred around the sustainable and multifunctional management of landscapes, maintaining and strengthening nature, landscape, heritage and recreation by bringing together inhabitants and stakeholders. Their view on SRC is unknown. Nonetheless their quest for multifunctionality might lead to their interest and support for SRC but this is rather unlikely given that there are other historic land uses which can also provide bioenergy in a more extensive way with a smaller landscape impact, such as hedges and pollards. Their interest for bioenergy, which up until now was mainly through valorisation of this landscape wood, could shift to a more proactive approach where also SRC could play a role should there be interest and support from local stakeholders (own deduction). They could play a key role in connecting the different actors in the production chain and the local inhabitants to foster a participative local bioeconomy.

Cities and municipalities are for the moment not using SRC. Nonetheless they could strategically incentivize SRC and act as a buyer for the wood in order to support the transition towards carbon neutrality (own deduction). The article of Broeckx et al. (2011) introduced the cities and municipalities to SRC and its benefits via the journal *Groencontact* (Broeckx et al., 2011). Multiple local governments have already started warming their buildings with heat generated from the combustion of wood (e.g. Bocholt, Eeklo,...). This wood comes from landscape management (roadsides, parks etc.) but could also come from SRC. By incentivizing local farmers or owners of “marginal land” to assign a part of their land to SRC, they could increase their independence of fossil fuels, and foster a stronger regional (bio)economy. They could also act as connectors of the supply chain and provide a stable market for the local plantation owners. This might be especially interesting in highly deforested areas with few small landscape elements left, as this would also be beneficial for nature and possibly the landscape. Local governments also play an important role in the granting of permits of the Field Code.

“Vlaamse landmaatschappij” is an important stakeholder as it checks compliance with the legislation and regulations concerning agriculture. Their view on SRC is unknown.

4.3.5 (Inter)national and regional policy interest in SRC

As seen in chapter 2, at an international, national and regional level there is the acknowledgement that SRC could be beneficial for both green energy production and biodiversity in the (agricultural) landscape. Nonetheless, the projections of the Flemish government on the short term development of the SRC market is rather conservative (Departement Landbouw & Visserij, 2021b). Both an interview with a government official and the projections of the development of SRC seem to indicate the absence belief that SRC can have a real impact in the coming decade. Further research on SRC is also not a priority of policymakers, as was reported during an interview with an actor within Flemish policy. This should, in fact, not come as a surprise, since the research and communication on SRC in Flanders has already been quite extensive in the past decade (see mainly the [POPFULL research project](#) which had extensive scientific and popular outreach and was even visited by the erstwhile prince of Belgium but also the work of INBO, gathered in Meiresonne, 2006). This has however not been followed with the predicted increase in area under SRC. Nonetheless, this could change with the emergence of new technologies, such as biofuels, biocomponents or materials or external shocks such as the current energy and geopolitical crisis.

In Wallonia there is a clear policy interest in hedgerows with the funding scheme [Yes We Plant](#). This programme has the ambition to plant 4.000 km of hedgerows and/or one million trees. Also linear SRC are supported by this programme and can receive up to €4 per meter. In Flanders a similar approach could be taken.

To summarise:

The social impact of SRC is hard to predict as it depends on a variety of factors which are often case-specific. Stakeholder involvement will in any case be key when converting land to SRC plantations. Gradual deployment of SRC in the landscape, with care for landscape types, would probably be accepted by local stakeholders and would not disrupt the markets. Increases in domestic biomass production from SRC could be beneficial for Belgian society but this can be met with resistance from local actors, civil society and competing industries. The different stakeholders, on all levels, will need to be first made aware of the benefits and pitfalls of biomass from SRC and then connected to each other. This will be imperative to create the necessary policy changes that can incentivize land owners to plant SRC. It should be noted, however, that there are more barriers than financial feasibility and clear legislation. Many farmers were reported not to be interested in or have any affinity with woody biomass as their moral purpose is food production. Looking back at the historic landscape and proving that woody elements are a part of Belgian agricultural history could help in shifting this idea. Local governments and actors such as the *Regionale Landschappen* and municipalities could lead by example and integrate SRC into their already existing biomass chains, thereby creating a stable demand for SRC wood.

5 THE INDIRECT AND SPILLOVER EFFECTS OF LARGE SCALE SHORT ROTATION COPPICE

The concerns that civil society raises against large-scale introduction of biomass used for energy purposes were already briefly mentioned in section 4.3.3. Since these are indeed valid concerns, we will discuss the extent to which these apply to SRC systems in Belgium should SRC be planted in a large scale and how to potentially mitigate these impacts.

5.1 GHG EMISSIONS

Large-scale introduction of SRC for the production of energy could lead to GHG emissions rather than reductions. This will depend on a variety of factors:

- 1. The soil organic carbon content** of the land on which the SRC is planted:
In case the SRC is planted on former intensive agricultural land, the change to SRC will lead to sequestration of carbon in the soil, which is stored there for at least the whole life of the plantation (Whitaker *et al.*, 2018). A fraction will stay there even after the root system has been uprooted to make place for a new plantation or land use (Wachendorf *et al.*, 2017). Should the soil on which the SRC is planted already be high in soil carbon (for example forest soils or historic permanent grassland), there might be a net loss of soil carbon due to the introduction of SRC (Don *et al.*, 2012).
- 2. The former land cover** of the land on which the SRC is planted:
If the SRC substitutes land that was used for food or feed production, this might lead to other land elsewhere to be changed to agricultural land, to compensate. This is called indirect land use change and often leads to deforestation elsewhere. This indirect change can amount up to between 66 and 89% of the total GHG emission due to land use change (Schubert *et al.*, 2009) and could thereby render the balance negative.
- 3. The supply chain:**
Transport, conversion processes and possible waste products have an impact on the GHG balance, although they are only minor compared to the emissions from direct and indirect land use change (Njakou Djomo *et al.*, 2015b). Nonetheless, wood is not an energy dense product and contains much water, making its transport over long distances inefficient. It should be produced close to the place of consumption or densified locally.

5.2 BIODIVERSITY LOSS

Large-scale introduction of SRC in Belgium could lead to biodiversity loss. This can happen on a local scale where SRC is planted on land with a high value for nature, such as some marginal lands or forest land (Pedroli *et al.*, 2013). On a global scale this can happen when substituting crops for food or feed. In this case the loss in biodiversity happens due to the same mechanism as the GHG losses through indirect land-use change. The land that will be brought under agricultural production to compensate for the loss of agricultural land here, often has a high

3. As large investments have to be made, the payback time could be exceeding the actual usefulness of the technology and thereby hold back further transitioning to a carbon negative society.
4. The costs that are needed to develop biomass conversion plants might be better invested into other things with a higher societal return on investment. The analysis of this is, however, beyond the scope of this report.

To summarise

When SRC is planted on land with a low soil carbon and it does not substitute food production it will probably have a positive GHG balance, meaning it will successfully mitigate climate change. When transport distances increase, this gain will decrease

Large-scale unregulated implementation of SRC would most probably have detrimental effects for the environment in Belgium, Europe and elsewhere and could lead to a number of other unwanted side effects. Nonetheless, with sound and enforced policies in place, the development of an economy around biomass from SRC could also have large benefits for nature and society. Some key policy checks include:

- No substitution of forests, loss of biodiversity or loss of soil organic carbon because of planting of SRC
- In the event that biomass should become more valuable (for example because of high electricity or fuel prices), policies should be in place to protect food production
- Clear cascaded use of SRC biomass to incentivize an efficient and circular bio-economy
- Controlled building of industrial infrastructure, adapted to the sustainably available amount of wood from SRC to avoid using other, less sustainable sources.

Coupling back to section 1.4, if the mentioned 21.000 hectares that would hypothetically be eligible for SRC would actually be used, the effects could probably be positive rather than negative if it would be done taking into account the recommendations of section 4.1. Nonetheless, further study is required to develop a land allocation decision support tool to confirm this.



Development and Case Study Results from the Göttingen District Assess Options for the Siting of Short Rotation Co. In: Manning D.B., Bemmann A., Bredemeier M., Lamersdorf N. & Ammer C. (eds.). *Bioenergy from Dendromass for the Sustainable Development of Rural Areas*. Wiley-VCH Verlag GmbH & Co, p. 21–44.
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Appendix

Annex 1: Aan welke regelgeving is de aanplant, beheer en kap van KOH onderhevig?

Rotatielengte Ruimtelijke bestemming	Minder dan 3 groeiseizoenen	Meer dan 3 groeiseizoenen
Ruimtelijk Kwetsbaar Gebied (zie bijlage 1)	Begin bij punt 1	Begin bij punt 2
Agrarisch Natuurdecreet beschermd gebied (zie bijlage 2)	Begin bij punt 3	Begin bij punt 3
Niet-Agrarisch Natuurdecreet beschermd gebied (zie bijlage 2)	Begin bij punt 4	Begin bij punt 4
Ander gebied niet verbost ²¹	Begin bij punt 5	Begin bij punt 5
Ander gebied verbost	Begin bij punt 1	Begin bij punt 2

1) Dit terrein/deze aanplant valt niet onder het Bosdecreet

- a. Het beheer van de KOH is niet vergunningsplichtig onder het bosdecreet zolang de aanplant binnen de drie jaar na de laatste exploitatie gerood wordt en erna terug als landbouwgrond gebruikt wordt. De eindkap moet gemeld worden aan het ANB en de landbouwkundig ingenieur van Dienst Landbouw. (artikel 87 van het Bosdecreet)
- Was de laatste exploitatie langer dan 3 groeiseizoenen geleden? Ga door naar 2.
 - Voor de aanplant is er mogelijk een vergunning nodig, ga hiervoor naar 3

2
3

2) Dit terrein/deze aanplant valt onder het Bosdecreet

- a. Voor de aanplant is er een gemeentelijke bebossingsvergunning nodig (Veldwetboek artikel 35 bis, §5). Je hebt een goedgekeurd beheerplan nodig voor het beheer en voor de eindkap moet er een omgevingsvergunning tot ontbossing aangevraagd worden met een bijhorend boscompensatie voorstel. Het gebruik van gewasbeschermingsmiddelen kan geregeld worden door de overheid (artikel 21 van het Bosdecreet).

6

²¹ met houtopslag van minder dan 22 jaar

<p>Behoort de ruimtelijke bestemming ook tot “Kwetsbaar gebied natuur” (lijst in bijlage 2)? Ga door naar 2b</p> <p>b. Er mag geen gebruik gemaakt worden van bemesting (artikel 41bis van het Mestdecreet).</p>	<p>6</p>
<p>3) Dit terrein/deze aanplant valt niet onder het Natuurdecreet</p> <p>Het Natuurdecreet specificeert dat de maatregelen genomen voor de natuur in al de agrarische gebieden buiten de beschermingszones, de landbouwbedrijfsvoering of het teeltproces niet kunnen regelen. Toch is er voor aanplant mogelijk een <u>omgevingsvergunning voor het wijzigen van de vegetatie</u> nodig wanneer de reeds aanwezige vegetatie beschermd is.</p> <p>Indien het om een verpachte grond gaat, ga verder naar 7.</p>	<p>8</p> <p>7</p>
<p>4) Dit terrein/deze aanplant valt onder het Natuurdecreet</p> <p>(z)KOH wordt gezien als natuur wanneer het niet in agrarisch gebied zit (ANB richtlijn 2006/01, titel I.1.13). Er is voor aanplant, oogst en eind-kap een <u>omgevingsvergunning voor het wijzigen van de vegetatie</u> nodig. Dit kan ook opgenomen worden in een beheerplan. Daarbovenop moet men nagaan of er een <u>omgevingsvergunning voor stedenbouwkundige handeling</u> nodig is voor beheersmaatregelen en de eindkap. (artikel 13 van het Natuurdecreet)</p> <p>Indien het om agrarisch gebied gaat, ga verder naar 5.</p>	<p>8</p> <p>5</p>
<p>5) Dit terrein/deze aanplant is niet vergunningsplichtig</p> <p>KOH valt niet onder het Bosdecreet (Bosdecreet artikel 3, §2.4), noch onder het Natuurdecreet. In de meeste gevallen is er dus geen vergunningsplicht. Toch kan men best nagaan of er een <u>omgevingsvergunning voor stedenbouwkundige handeling</u> nodig is voor beheersmaatregelen en de eindkap.</p> <p>Indien het om agrarisch gebied gaat, ga verder naar 6.</p>	<p>8</p> <p>6</p>
<p>6) Dit terrein/deze aanplant is eventueel onderhevig aan het Veldwetboek</p> <p>Agrarische- en bosgebieden zijn onderhevig aan afstandsregels wat betreft de aanplanting naast gebieden met een gelijke of andere</p>	

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natuurreservaten zoals aangeduid op de plannen vastgesteld met toepassing van het decreet betreffende de ruimtelijke ordening, gecoördineerd op 22 oktober 1996, elke vorm van bemesting verboden met uitzondering van bemesting door rechtstreekse uitscheiding bij begrazing, waarbij twee grootvee-eenheden (GVE) per ha op jaarbasis worden toegelaten.

Bijlage 3: Natuurdecreet beschermde gebieden

Artikel 13, § 4 en § 5 van het Natuurdecreet stelt dat een omgevingsvergunning nodig is voor het wijzigen van de vegetatie of KLE in de volgende gebieden²²:

- 1) Groengebieden,
- 2) Parkgebieden,
- 3) Buffergebieden,
- 4) Bosgebieden,
- 5) Natuurontwikkelingsgebieden,
- 6) Valleigebieden,
- 7) Brondgebieden,
- 8) Agrarische gebieden met ecologisch belang of waarde,
- 9) Agrarische gebieden met bijzondere waarde,
- 10) Alle gebieden met een vergelijkbare bestemming als al de voorgaande opgesomde gebieden.

Alsook voor het wijzigen van KLE en hun vegetatie in de volgende gebieden:

- 11) Landschappelijk waardevolle agrarische gebieden,
- 12) Agrarische gebieden,
- 13) Alle gebieden met een vergelijkbare bestemming als al de voorgaande opgesomde gebieden.

Bijlage 4: ANB interne richtlijn over KOH

ANB richtlijn 2006/01, titel I.1.13 stelt:

“Deze aanplantingen (red: bedoeld wordt “KOH en wissenteelt”) horen eerder in de landbouwsfeer thuis, waar overigens landbouwmethodes als besproeiing en bemesting gangbaar zijn. Vandaar dat uitzondering gemaakt wordt voor de korte omloop-houtteelt, dit evenwel beperkt tot deze teelten die geplant worden op daartoe geëigende (in principe agrarische) bestemmingen.”

Bijlage 5: Definitie van vegetatie volgens Omzendbrief LNW/98/01

Omsendbrief LNW/98/01 vermeldt:

“Onder vegetatie moet worden verstaan : de natuurlijke en halfnatuurlijke begroeiing met alle spontaan gevestigde kruid-, struweel- en bosbegroeiingen, en dit onafhankelijk van het feit of het abiotisch milieu al dan niet door de mens beïnvloed of gevormd is. Het betreft zowel

²² Doorstreping van gebieden wijst erop dat deze al in de Vlaamse Codex Ruimtelijke Ordening genoemd werden als kwetsbare gebieden en een KOH op deze gebieden de facto al onderhevig is aan het meer stringente Bosdecreet. Hierdoor moeten de vergunningen van het Natuurdecreet niet meer aangevraagd worden.

begroeiingen in het water als op het land. Ook bossen worden ertoe gerekend onafhankelijk van het feit dat de boomlaag is aangeplant of niet.”



