GOZDARSKI INŠTITUT SLOVENIJE
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Kozjanski park

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Exploiting the Potentialities of Solid Biomasses in EU Parks

D 5.6.6 PROPOSITION OF LEGAL MEASURES AT NATIONAL LEVEL

Recommendations for Decision Makers

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Main problems in Slovenia and recommendations

The main identified problems and corresponding recommendations for the development of wood biomass production chains are as follows:

1. **Problem: Policies on local level**
   Policies on local level are aligned with national and EU policies. All those policies support use of renewable energy sources (RES). Nevertheless, local level policies (e.g. municipality level) do not predict biomass as a primary RES in the municipality. In the cases where municipal policy documents (strategies, development programmes) specify biomass as a primary RES, they do not prescribe what should be the origin of biomass.
   Recommendation:
   Revise and update local and national policies (if needed), and specify that the biomass should be from local sources.

2. **Problem: Policies of protected areas**
   Policies of protected areas do not recognize biomass as a primary RES. Many protected areas in Slovenia do not have broader policies and are guided by Annual Work Programs or Management Plans. Those documents do not predict production and use of biomass for heating in the protected areas.
   Recommendation:
   Create policies for protected areas that do not have it. Predict production and use of local biomass for heating.

3. **Problem: Spatial planning**
   As a consequence of issues listed under 1 and 2, *spatial planning on municipal or protected area level* do not predict surfaces for biomass production and use. Consequences are seen on operational level, when it is not possible or it is time and resource consuming to gain a building permit.
   Recommendation:
   Apply integrative spatial planning that predicts surfaces for local biomass production and use in protected areas.

4. **Problem: Environmental legislation**

   Forest conservation has higher priority than wood biomass production. *Environmental legislation prohibit forest management operations* in the strict forest or nature reserves, as well as in the central zones of other protected areas. In this cases, it is not possible to utilize biomass. There are many cases where grasslands and pastures get overgrown due to stopping of grazing. From those areas wood biomass could be utilized, so they could be converted back to pastures and grasslands. Prohibition of cutting and other interventions results in a change of natural landscape and loss of biodiversity.

   Recommendation:

   Research influence of biomass production in the protected areas. Revise environmental and other related legislation and make it more flexible with regard to biomass utilization.

5. **Problem: Ownership of land**

   Diverse and unclear ownership of land in the protected areas causes manifold obstacles. Main identified obstacles are:

   - Unknown legal owners of land
   - Low timber mobilization
   - Small amounts of wood biomass from small scale private forests in the protected areas
   - Discontinuous wood supply in/from small-scale forests
   - Biomass utilization is not economically viable and profitable
   - Complications in acquiring necessary documentation for building or biomass utilization

   Recommendation:

   - Update land cadastre
   - Develop and implement operational mechanisms and initiatives for merging of small land estates
   - Develop and implement initiatives for associating private forest owners with regard to forest management

6. **Problem: Subventions and credits**

   Subventions and credits for refurbishment of public buildings exist, but they do not specify that biomass used for heating needs to be from local sources.

   Recommendation:

   Revise and update subventions' and credits' requirements with specification that the biomass should be from local sources.

7. Problem: Public procurement

Public procurement procedures are obligatory to every public organization. According to national and EU legislation, public procurement should follow 'the best value for money' rule. As most of the protected areas are financed from State budget, they often take the cheapest offers for wood biomass. That biomass is usually not from local sources. If request for local wood biomass would be in the public procurement documents (tender), it could be interpreted as giving advantage to some producers, which is not in line with EU and national legislation.

Recommendation:

Revise rules of public procurement and green public procurement on a way that enables demand for local products.

Regional Park Goričko – Example for transfer of experiences from BioEUParks

Goričko lies in the most northeastern part of the country, placed between the Austrian and Hungarian border. Regional Park Goričko has 462 km^2. There are 11 Municipalities and 90 villages in it. Goričko is dominated by medium-humid to semi-dry grasslands. Dry grasslands are the most threatened habitat of Goričko, as a result of the abandonment of the use and accelerated overgrown with bushes and trees. Vegetation of overgrown meadows is similar to the vegetation of the forest edge. The most of the Regional Park Goričko (around 390 km^2) is under Natura 2000, following both the Birds Directive and the Habitat directive.

Picture 1: Goričko Regional Park; Source: www.pri-storklji.si

The park Goričko already have larger producers of chips, but the most of production is sold in Austria, because there is not enough users of wood biomass in the park area. In the park area, two schools are heated on wood biomass. The origin of that biomass is unknown, as schools always find the cheapest provider (public procurement).

Several years ago, Town Grad wanted to introduce heating on wood biomass, as they are managing 8 ha of park area, cleaning rivers and have larger amount of biomass from grasslands, and all this could be used for heating. Since the Institute for Protection of Cultural Heritage did not permitted biomass heating installation, Grad is now heating on gas.

There is no concept that locally available biomass should be used first in local heating sistems. Regional Park Goričko and the Inland Regional Park have huge amounts of biomass from grasslands and subsequent problems with composting or processing it. Part of biomass from grasslands from Regional Park Goričko is sold in Austria. Goričko mowed 40 hectares of meadows and only 30% is suitable for animal food. Everything else could be used, for example for heating.

Their opinion is that the BioEUParks project generated interesting information. Now, all protected areas in Slovenia should examine the possibility of using local biomass and elaborate a common plan of using it on local scale.

Regional Park Goričko has an intention to implement experiences from Kozjansko Regional Park in their area but they need support from different institutions / stakeholders in the region.