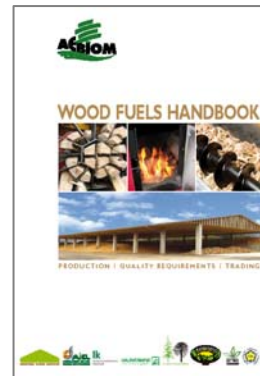


Biomass Trade Centres

Below there is a brief concept of the biomass trade centre on the example of an Austrian “Biomassehof”. The design and size of the respective site in Austria are also very different. This information should serve as a guideline for further planning.

The realization of the “Biomassehöfe” were made as part of an EU project “BiomassTradeCentres”. Details of the biomass centres and their equipment (e.g. drying systems) can be found on the homepage www.biomassstradecentres.eu.



Biomass Trade Centres in Austria

A. ABSTRACT

The increasing consumption of energy, the finite nature of fossil fuels, the current supply uncertainties and the limited ability of the environment to absorb emissions have, in the truest sense of the word, stoked demand for biogenic fuels. The sharp rises in oil and gas prices predicted by the experts have long-since proved to be more than scare stories, and have adjusted the conditions in the heating sector in favour of biomass heating systems. Farmers and forest managers are by far the most important providers of biomass, and at the same time the key players in fostering the increased use of renewable energy sources. In future, in addition to traditional fuels such as split logs and wood chips, the biomass sector will also offer pellets and other alternative agrarian fuel products such as miscanthus and poplar pellets, hay pellets and straw pellets, etc.

Securing a sustainable energy supply will be this century’s greatest challenge. Since the solutions to this energy challenge will be as much regional as national or international, it would be wise to formulate and determine regional approaches to meeting it. Fulfilling regional energy supply requirements from renewable energy sources closes not only the ecological but also economic circles. Prices for split logs, wood chips and pellets are developing in a relatively stable manner and largely independent of the sharply fluctuating world market prices for oil and gas. Fuel production is opening up new areas of activity for the agricultural and forestry sector, as well as for the timber processing industry. Wood is therefore not only a crisis-proof and cheap source of energy, but also a home-grown raw material that adds local value by creating and securing jobs and income within the region.

The “back to nature” trend presents local producers with the great challenge of

providing high-quality fuels in sufficient quantities throughout the year. The split logs and wood chips market is currently an informal market, as a result of which potential partners are difficult to locate. To make the market for biogenic fuels more visible, the “Regional Biomass Centres” project was launched in Styria. A biomass centre is a regional “service station” for top-quality biogenic fuels, which is run by a group of local farmers. The marketing of fuels through the biomass centre creates added value both for the participating farmers and the customers, who benefit from the bundled, high-quality local supply of biofuels. The product range is further enhanced by a range of comprehensive services, such as the delivery of fuel or competent advice on all questions relating to the use of biogenic fuels. Through a comprehensive network of biomass centres, customers can be certain that supplies for their heating systems are guaranteed over the long term. For this reason, private households and businesses can choose this cost-effective and environmentally-friendly method of heating in good conscience.

The protected word/image mark “Biomassehof Steiermark” (Biomass Centre Styria) enables every biomass centre in Styria to present a consistent, coordinated front and particularly strengthens consumer trust in wood as a source of fuel. Ultimately, the purchase of fuel is always a matter of trust!

B. “BIOMASS CENTRE STYRIA” PROJECT CONCEPT

In Austria, biomass combustion technology has achieved an exceptionally high level. In the last few decades, the market has developed enormously and offers a broad range of efficient and environmentally-friendly heating systems. Modern wood heating systems offer the same comfort and convenience to consumers as heating systems designed for fossil fuels, meaning that what was once a persuasive argument against their use is no longer so important. In recent years, fuel wood has started to be used to a significant extent to supply heat in agricultural and timber processing companies as well as to fuel micro and local heating networks. In addition, fuel wood increasingly finds its way into our living rooms in the form of tiled and wood burning stoves.

At present, firewood and forest wood chips are predominantly marketed on an informal level. Similarly, pellet suppliers are not at all easy to locate. Fuel wood and forest wood chips are, for the most part, collected by individuals and sold on a “word of mouth” basis. This makes the procurement of fuel more difficult for those customers (private individuals, companies, etc.) who themselves have no woodland and no direct access to forest owners or fuel suppliers. In spite of the enormous availability of resources, for this reason it has not, to date, been possible to dismiss those who criticise the sector as being unable to ensure security of supply. An appropriate supply infrastructure with local interim storage and marketing facilities that would make it possible to supply customers quickly and easily is currently lacking.

The central marketing idea of the “Styrian Biomass Centres” concept consists in the construction of a collective rural marketing channel for biomass fuels and energy services in Styria. Regional biomass centres will market all kinds of biomass fuels supplied by farmers. The main product ranges are fuel wood, split logs and wood chips. In addition, it may be possible to supplement this by trading wood pellets. The first pellet factory producing pellets from forest wood chips opened its doors recently in Upper Austria. In future, other biomass fuels such as whole plant pellets or grass pellets, which are pelletised either directly in the field or at the biomass centre, could also be incorporated into the range of products. As a second string to their bow, it is intended that these regional biomass centres should also act as energy service providers wherever possible and become involved in wood energy contracting projects and biomass heating plants. Above all, this should be the case in those communities where to date no other rural groups have been set up to run projects of this nature.

In essence, every biomass centre pursues the following aims:

- Setting up regional supply centres (biomass centres) in the districts of Styria offering fuel wood, forest wood chips, other biomass fuels and energy services;
- Marketing under a standardised word/image mark that should evoke associations such as safety, security, reliability, regional value, quality, etc. in the customer’s mind;
- Safeguarding the security of supply;
- Obvious, visible presentation as a provider of biomass of all kinds;
- Guaranteeing consistent quality standards (fuel quality, provision of services);
- Promotion of services such as fuel delivery, involvement in wood energy contracting projects, expert advice on the subject of “heating with wood”.

C. PROJECT IMPLEMENTATION

The first practical implementation of the “regional biomass centre” concept was the Waldstein Biomass Centre in 2005. Over 60 forest farmers successfully took up the challenge of collectively processing and marketing biogenic fuels. At present, three biomass centres supply the Styrian population all year round with high-quality fuel. Besides private households, other customers of the biomass centres include the operators of local and district heating plants. The Styrian Chamber of Agriculture and Forestry, together with the Styrian Forest Owners’ Cooperative, is promoting the establishment of further biomass centres with the aim of ensuring that supply in Styria becomes state-wide.

The concept of the Styrian biomass centres has also found favour in other

neighbouring countries. In the context of the EU “Biomass Trade Centres” project, the successful Styrian model is now being implemented in Italy, Slovenia and Poland (www.biomassstradecentres.eu).

Here farmers are helping to maintain regional value creation:

	Waldstein	Pöstal	Hartberg
Date opened	May 2007	April 2008	October 2009
Raw material supply	60 members; 2,200 hectares	13 members; 3,000 hectares	50 members; 3,000 hectares
Sales volumes	7,000 loose cubic metres of wood chips 400 stacked cubic metres of split logs	14,000 loose cubic metres of wood chips 800 stacked cubic metres of split logs	14,000 loose cubic metres of wood chips 800 stacked cubic metres of split logs
Product range	Wood chips, split logs	Wood chips, split logs	Wood chips, split logs, pellets planned in future
Heating oil substitution per heating season	0.6 million litres	1.2 million litres	1.2 million litres
Greenhouse gas production per heating season	1,887 t CO ₂	3,775 t CO ₂	3,775 t CO ₂
Target group	Heating plants, hotel and restaurant trade, private customers	Heating plants, hotel and restaurant trade, private customers	Heating plants, hotel and restaurant trade, private customers
Service	Delivery and pick-up	Delivery and pick-up	Delivery and pick-up
Invoiced by...	Loose and stacked cubic metres	Loose and stacked cubic metres	Weight and water content

D. PROJECT REQUIREMENTS

I.) Quality Criteria

Strict quality criteria must be adhered to in order to guarantee the quality of the products and services supplied. "Biomassehof Steiermark" (Biomass Centre Styria) is a regional mark belonging to the Styrian Forest Owners' Cooperative. Therefore, every operating group must be a member of the Cooperative. Another requirement is that every operating group has to be a farmers' association with at least ten forest owners, and the minimum storage quantity in any biomass centre must be 500 solid cubic metres of energy wood or the energy equivalent of one million kilowatt hours of primary energy. The minimum equipment for a participating biomass centre is as follows: a storage building, a minimum storage area for energy wood, a paved handling area, documented proof of regular moisture measurements to safeguard the fuel quality, a standardised biomass centre advertising column and a biomass centre information panel. Where possible, a calibrated weighbridge should be available for calculating the available amount of fuel. As a minimum, the range of products offered by the biomass centre must include energy wood, wood chips and split logs. Importing (foreign) wood to the biomass centre is not permitted, and the same applies to trading in recycled products (materials as per the Austrian Waste Management Act), such as waste wood and similar products. The biomass centre as a point of sale is obliged to maintain a customer and service centric approach. Accordingly, consistent opening times must be publicised and adhered to.

II.) National and Regional Economic Requirements

Biomass centres: Multipliers of regional value creation

On average, each Austrian household spends € 1,500.00 per year on importing oil and gas – and the trend is increasing. In the most recent past, the global financial crisis has contributed to a significant decline in the cost of fossil fuels – albeit only over the short term. Where in 2007 the price of a litre of heating oil had already exceeded one euro, in 2009 it had dropped to only 60 cents. However, if we look at the bigger picture, it seems clear that, whether we like it or not, the time of cheap oil and gas has come to an end. A relieving of the tension in the financial markets will also lead to a recovery in prices for fossil fuels. The majority of our fossil fuels come from crisis-wracked countries that are unable to guarantee Europe a long-term, secure energy supply (e.g. gas crisis of 2009). With modern, highly efficient biomass heating systems it could be possible, in the near future, to cover the vast majority of our heating needs. In contrast to fossil fuels, wood as an energy source is climate-friendly, sustainable and guarantees regional value creation, which is particularly important in times of financial and economic pressure. Regional energy sources – fuel in and for the region.

Wood is a biogenic energy source that is available throughout Styria in sufficient quantities – more wood is regrown than is needed. In addition to forests, agricultural cropland and grassland is available, which in the medium term could be used for fuel production. The higher the proportion that can be covered through domestic production, the less dependent our energy supply will be on foreign countries. In the past, energy wood products were only marketed with difficulty, although there is a great deal of interest on the part of forest owners in supplying these products – provided that the economic conditions are right. Biomass is a booming market. There is only limited additional capacity for producing fuel wood and forest wood chips among individual foresters. Anticipated bottlenecks in the supply of fuel wood and forest wood chips would have a negative impact on the entire forestry and timber industry. Providing many small to medium-sized and even larger heating systems with biomass fuels that fulfil uniformly defined quality standards is the overriding aim. These quality requirements can only be achieved through a “central” supply system, i.e. via biomass centres that are subject to constant quality control. In this way, new possibilities for income generation will be created in the rural environment, new sales opportunities offered to forest owners, and a more efficient processing of wood as a fuel and an increase in added value will be achieved. Additional customer service with a regional (central) range of biogenic fuels will make it possible to supply customers quickly and efficiently. Through a comprehensive network of biomass centres, customers can be certain that the supply of fuels for their heating systems is guaranteed over the long term. Continuity and sustainability are significant advantages of biogenic fuels. An informative umbrella brand (word/image mark) is used for the Styria-wide standardised marketing of wood as a fuel.

III.) Marketing Biomass Centres

Communication is the essential tool for successful project implementation

The protected “Biomassehof” (biomass centre) word/image mark belonging to the Styrian Forest Owners’ Cooperative provides all biomass centres in Styria with a uniform, coordinated appearance. This collective identifying mark guarantees the customer a secure fuel supply of regional origin and the highest quality. Each biomass centre is committed to complying with strict quality criteria, and this is checked on an ongoing basis.

A number of new biomass centres are expected to open over the next few years, which means that in the long term an uninterrupted supply of fuel will be guaranteed throughout Styria. In terms of raw material procurement (supply of wood) as well as raw material provision (customer delivery), the catchment area of a biomass centre covers around 30 kilometres, ensuring quick and efficient local supply. This is the only way in which the intrinsic idea of a “regional supply” can be

sustainably maintained. A detailed marketing concept is drawn up for each regional biomass centre, as the detailed plan must be tailored to the respective region. However, in terms of the basics, the marketing plan is the same throughout the state. This guarantees a uniform market appearance, which enhances the centres' recognition value among customers. The Styrian Forest Owners' Cooperative and the forestry department of the Styrian Chamber of Agriculture and Forestry are responsible for the overall marketing. This means that synergies can be exploited to benefit the biomass centres. The long-term vision consists in the biomass centres throughout Styria positioning themselves as reliable suppliers of quality fuels and local heating. In future, the biomass centre will act as a central partner in forest and agricultural biomass matters for the rural population. Local information events, open days and an internet presence via the www.biomassehof-stmk.at website will ensure the best possible communication with customers in the region.

The customer takes centre stage!

Consumers must first of all get used to the idea that they will no longer have it as easy as they did with oil and gas. Energy sources such as oil and gas have offered consumers a hitherto unknown level of convenience in the field of energy supply. In view of the changing conditions in the fuel market, the customer is searching for new, equally convenient options. A biomass centre is one such option for the consumer, as it makes a bundled package of environmentally-friendly quality fuels available from a central location. Besides private households, other customers of the biomass centres include businesses, housing associations, local authorities and public utilities as well as the operators of heating stations – local and district heating plants – and biomass CHP plants. No matter who they are purchasing fuel from, a biomass centre has the following advantages for consumers:

◎ *Easy and convenient buying*

- Efficient and transparent range of biomass fuels (like in a supermarket) – “I can see what I'm buying”
- Customer-friendly opening times – especially Friday afternoon and Saturday
- Increased convenience through additional services (processing, delivery, advice, etc.)
- Ordering service
- Service and information point for potential customers

◎ *Security of supply*

- Available all year round
- Continuous supply
- Crisis-proof

◎ *Local quality provides security when buying*

- Guaranteed quality standards

- Local product from the region – the “producer has a name”
- Clear product differentiation to foreign wood

◎ *Price stability and transparency*

- Cost-efficient fuel
- Stable price development creates trust
- Transparent prices – good comparability with other energy sources

E. LONG-TERM VALUE

In addition to the known climate and environmental aspects, other factors that favour accelerating the “biomass centre” concept are the current trend for tiled stoves and the increase in the region’s local and district heating systems. Consumers who are currently building or renovating their homes cannot ignore the question of whether or not to install a tiled stove. An individually planned tiled stove is more than just a secondary or additional heating system that is primarily used during transitional periods – it is also an especially creative and decorative household item. The system relies on regional, high-quality fuel wood. Tiled stoves must not necessarily be fuelled by split logs; recently pellet-fuelled tiled stoves or stoves that run on a combination of pellets and split logs have become more readily available. To prevent this trend from dying out before it has really become established, an uninterrupted supply of wood as a renewable energy source in all its forms is essential. The biomass centres are able to meet this requirement by offering a broad range of biomass fuels all year round, as well as a variety of services and expert advice. Apart from private customers, businesses and industrial companies also value this service highly. The successful implementation of local and district heating projects also requires a sustainable supply of fuel. A mainstay of the biomass centres is therefore the provision of industrial and high-quality wood chips to these types of plants. In the medium term it is also conceivable that local and district heating units could be supplied with agrarian fuels.

The biomass centre project is based on the principle of “the farmer as an energy producer” – a slogan frequently used in the media and all too often misrepresented. The fact that the operating group must consist of local farmers guarantees that the entire added value remains in the region, which is not the case with the multinational oil and gas suppliers. Marketing renewable fuels through biomass centres creates sustainable benefits for the customer, the operator and ultimately for the entire region.

Example of a Biomass Trade Centre in Austria

1 Project Objective

Please indicate the project's objectives. Note that the sole purpose of the "M 122/3 Biomass" programme is to promote the supply of biomass.

Production of biomass wood chips for small-scale plants (G30) and district heating plants (G50); split log production from hardwood.

2 Project Operator

Describe the nature of the project operator/funding applicant (operator of an agricultural/forestry enterprise, other funding applicant, association of forest owners, agricultural association). In the case of a consortium, please indicate the structure and composition of the organisation (name, address, registration number and forest area owned by the members, distribution of shares among the individual members).

Address: Biomassehof Pölstal GmbH, Bretstein 10, A-8763 Bretstein, Austria.
Reg. No.: FN 294231
Area: 2,000 hectares
Shares: 13 participants with equal shares (1/13)

3 Project Location

3.1 Location

Describe the spatial location of the planned project (exact address if available).

South-west of the village of St. Oswald-Möderbrugg
Storage areas, storage building and handling area: Gewerbeparkstraße 1, A-8763 Möderbrugg

3.2 Description of Location and Equipment

3.2.1 General

Describe the location's transport infrastructure, the size of the plot, the ownership structure, the existing buildings and mechanical equipment as well as any existing permits and approvals.

Access: approx. 100 m from the LB 114 road (western access to the site)
Plot size: 10,000 m² (owner: Biomassehof Pölstal GmbH)

Storage building, office and sanitary facilities

Drying

Permits: Building permit

3.2.2 Structures

Describe the structures required for the planned project including relevant dimensions: paved and unpaved areas (storage areas for raw materials and finished products, handling areas, roadways, residual areas, etc.), buildings (purpose, type of construction, plot sizes, storage capacities), weighbridges, drying areas, etc.

Please include a site plan and planning submission with this project description. Provide details of the current status of the official approval procedure.

Areas: Paved: 9,880 m²
Unpaved: 120 m²

Storage areas: Logs: 5,000 m²
Wood chips: 970 m²
Split logs: 110 m²
Handling: 2,900 m²
Roadways: 900 m²
Other: Embankments 120 m²

Storage building: 60 m x 18 m x 7 m (1,000 m²)

Construction: Reinforced concrete frame building with partial solid concrete walls (additional area through integration of round timbers), plank truss roof with corrugated cement covering.

Storage capacity wood chips: 5,000 loose cubic meters

Storage capacity split logs: 200 stacked cubic meters

Office and sanitary facilities: 3 m x 5 m (15 m²)

Electrical power unit: 3 m x 2.5 m (7 m²)

Drying area: 2 x 11 kW drying units

Permits: Building permit

Administrative procedure: pending!

3.2.3 Other equipment

Describe the other planned equipment (e.g. screening unit, drying fans, wheeled loaders, wood chip infeed systems).

Drying: 2 x 11 kW drying units (suction of air heated by the sun from the self-contained roof structure; 4 m² air inlet on the southern side, via flow channels in the nozzle plates (4 m x 15 m).

Infeed: Wood chips: via tipping trailer; ejector trailer (project participant); pump wagon (partner)

Split logs: Collection on-site; delivery by trailer; possibility of hiring a car tipping trailer (4 m³).

3.2.4 Organisational support

Describe the personnel to be used for the organisation and support of the project (e.g. for purchasing wood, acceptance of the goods, quality control, handling and preparation, sales).

One person employed for 20 hours (part-time employment); sales, invoicing, database creation and maintenance

Administration (purchasing; acceptance, quality control): project participant/machinery cooperative (MC) & MC services

Processing and handling: to be outsourced (tender procedure)

4 Description of Business Segments and Processes

4.1 Biomass Supply

Explain the method of biomass supply, starting with purchasing and including processing and the sales interface.

Purchasing of wood for energy production (planning of quantities: project partners/external forest management associations; supply date notification; log assessment) – log invoicing (log credit notes; payment date agreements) – interim storage (log inventory, drying by wind) – chipping by subcontractor (tender procedure) – filling the storage building (drying) – handling (rearranging wood chips in the storage building) – advertising: (placing of ads in the local newspapers; flyers; events; trade fairs; partners (department stores; builders; installers); Internet: www.biomassehof-stmk.at/poelstal. - Sales: (loading in case of collection by project participants; delivery in cooperation with partners or by project participants. - Invoicing via Bretstein office. - Bookkeeping and financial accounting (tax accountancy company SBT).

4.1.1 Raw materials

Please indicate the range of raw materials (e.g. wood for energy production, forest residues, root wood, short rotation wood, etc.) that will be accepted, processed and marketed in the context of the project.

Wood for energy production (spruce; larch) for the production of wood chips; hardwood varieties for the production of split logs.

4.1.2 Sources of raw materials, suppliers

For each type of raw material, please indicate the area from which it will be sourced. Explain how the sourcing of raw materials including purchasing will be organised, who the suppliers are and what quantities of raw materials are provided through longer-term supply relationships. Indicate what quantities of raw materials are provided by members of the project operating group.

Purchase of raw materials: Judenburg district

Project participants: 2,000 solid cubic metres (additionally, 176 forest owners as members of the Oberzeiring Alpenfleckviehzuchtgenossenschaft [Oberzeiring alpine cattle breeders' association] – 700 hectares)

External sources (forest management associations): 5,000 solid cubic metres

4.1.3 Purchase of raw materials, delivery logistics, acceptance

Please describe how the purchase of raw materials will be organised and implemented. Explain how the delivery of raw materials will be handled in terms of logistics and what procedures will be in place for the acceptance of raw materials (determination of quantities, classification, quality control).

Planning of required quantities: Project participants/external forest management associations

Notification of supply dates

Delivery by local transporters: (Negotiation of terms and conditions of delivery)

Log assessment: (Volume calculation; visual classification & quality check) by an assessor (= project participant).

4.1.4 Processing of raw materials

Describe the steps for processing (e.g. splitting, chipping, screening, drying) of the raw materials by raw material and final product (e.g. split logs, chips), the necessary handling steps (e.g.

rearranging/restacking by means of wheeled loaders) and the method of storage of both the raw materials and final products.

Wood chips: The chipping will be tendered out. The log storage areas are organised in such a way that as much product as possible can be blown directly from the log storage area into the building.

Rearrangement/restacking: Currently, dry wood chips and wood chips that are still to be dried are moved using equipment belonging to the project participants. (A wheeled loader may be purchased in the next few years!)

Split logs: Invitation to tender (outsourcing)

4.2 Biomass Sales

4.2.1 Product types, customers

Describe the types of product that you offer (e.g. forest wood chips, split logs) and which customers you aim to supply. Please indicate the quantities for which sales of biomass are already secured through existing supply contracts over the medium to long term (include copies of these supply contracts with the project description).

Wood chips: G50<W30 (district heating plants) – ex storage or delivered!
G30<W25 (small-scale and individual systems) – ex storage or delivered!

Split logs: Beech (PURE) 33 cm – ex storage or delivered!
Mixed (oak, birch, ash) 33 cm – ex storage or delivered!
In the case of split logs, minimal quantities (packed in cardboard containers weighing approx. 20 kg) are also available.

4.2.2 Sales organisation

Describe the planned organisation of sales (customer acquisition, pricing, services, supply conditions, invoicing, etc.).

Advertising: Placing of ads in the local newspapers; flyers; events; trade fairs; partners (department stores; builders; installers);
Internet: www.biomassehof-stmk.at/poelstal

Sales: Loading in case of collection by project participants; delivery in cooperation with partners or by project participants.

Invoicing: Via the Bretstein office.

Bookkeeping and financial accounting: (Tax accountancy company SBT).

4.3 Services

Do you offer any additional services (e.g. contract screening, contract drying, heating services, etc.)? If yes, please briefly describe.

Planned for the future!

5 Market Assessment

5.1 Potential Supply of Raw Material

Please indicate the potential supply of raw material in the area covered by your project and assess the availability for your project.

The forested area in the Judenburg district amounts to 76,600 hectares. The annual growth is around 9.5 solid cubic metres of standing timber/hectare, utilisation is around 3.9 solid cubic metres of

standing timber/hectare. According to the Austrian Forest Survey (Österreichische Waldinventur) 9,800 hectares are available for thinning.

Potential supply of energy wood: Project participants: 22,000 solid cubic metres (additionally, 176 forest owners as members of the Oberzeiring Alpenfleckviehzuchtgenossenschaft [Oberzeiring alpine cattle breeders' association] – 700 hectares); external sources (forest management associations): 5,000 solid cubic metres

5.2 Potential Market/Customers

Please indicate the potential market/customers and biomass requirements in the area covered by your project and provide details of the quantities of biomass that you anticipate being able to sell to these customers over the short to medium term.

Judenburg district: 40,000 inhabitants

Wood chip requirements for heating plants in the district: approx. 19,000 loose cubic metres

6 Timetable

<i>Anticipated commencement (month, year):</i>	5/2007 – 10/2007
<i>Anticipated completion date (month, year):</i>	10/2007
<i>Planned full operation from (month, year):</i>	10/2007

Pictures of the biomass trade centre







Contact & Information

Thomas Loibnegger
Energy & Biomass
T: +43 316 8050 1407
thomas.loibnegger@lk-stmk.at

**Chamber of Agriculture and
Forestry in Styria**
Hamerlinggasse 3
8010 Graz
Austria
www.lk-stmk.at



Franz Moser
Energy & Biomass
T: +43 316 8050 1366
office@bioenergie-service.at

Bioenergy Service
Hamerlinggasse 3
8010 Graz
Austria



The sole responsibility for the content of this publication lies with the authors. It does not represent the opinion of the European Communities. The European Commission is not responsible.