

Feedback from:

Bioenergia ry - the Bioenergy Association of Finland

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Submitted by

The Bioenergy Association of Finland

User type

Business association

Organisation

Bioenergia ry - the Bioenergy Association of Finland

Organisation size

Micro (1 to 9 employees)

Transparency register number

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Country of origin

Finland

Initiative

[EU rules on industrial emissions - revision \(/info/law/better-regulation/have-your-say/initiatives/12306-EU-rules-on-industrial-emissions-revision\)](/info/law/better-regulation/have-your-say/initiatives/12306-EU-rules-on-industrial-emissions-revision)

Regarding the proposed roadmap, Bioenergia ry - the Bioenergy Association of Finland would like to highlight some key issues which need to be taken into consideration by the European Commission.

As for the Inception Impact Assessment, making legislation consistent and interfaces more fluent between various regulations is welcomed, but overlapping legislation must be avoided. Greenhouse gas emissions and circular economy are already dealt with in other legislation (see below).

Broadening the scope of the IED to installations with a rated thermal input equal to less than 50 MW is unnecessary since those installations are already regulated under the Medium Combustion Plant Directive. There is no regulatory gap to be filled with broadening the scope to installations in current sectors just below the existing threshold. The necessity of adding sectors that fall outside the scope of the IED should be carefully assessed and consulted with the relevant stakeholders and industrial sectors and a thorough impact assessment should be carried out in advance.

Circular economy and decarbonisation of industry are both important targets for the EU and the IED should be consistent with these objectives. There is plenty of other legislation already in place focusing on these objectives. Greenhouse gas emissions are already regulated under the EU Emissions Trading Scheme (ETS) and therefore the IED should not include GHG-emissions abatement measures. Further measures to reduce GHG-emissions from industry should be focused on strengthening the ETS. As for the circular economy, the relevant promoting actions are mainly based on a value chain approach whilst the IED focuses on a single installation.

These issues should rather be considered under IED so that permitting does not unnecessarily delay or hamper introducing the activities and technologies promoting these policies. In case the activity or technology is clearly relevant in the pursuit of low-carbon or resource-efficient system, this should be regarded as positive. Also, the other possible environmental requirements should be evaluated in this context in order to keep these investments as attractive as possible.

In the current IED, the Article 42 should be clarified as it now excludes certain gasification and pyrolysis plants from the scope. In some cases, the competent authorities are unable to give permits for certain clean technologies because of the unclear regulation. A non-paper of this issue was published in 2018. Again, it should be assured that the IED regulation does not unduly create barriers for any climate positive actions.

The IED remains relevant to its overall objective to address emissions to air, water, and soil and to prevent the generation of waste, in order to achieve a high level of environmental protection as a whole. IED's purpose and objectives should mainly maintain as they currently stand. Attention should be paid to avoid overlaps, contradictions, or inconsistencies with other relevant EU legislation.

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