



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)

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Country of origin

Finland

Initiative

[FuelEU Maritime \(/info/law/better-regulation/have-your-say/initiatives/12312-FuelEU-Maritime-\)](/info/law/better-regulation/have-your-say/initiatives/12312-FuelEU-Maritime-)

We appreciate the opportunity to comment this important initiative, which supports achieving necessary GHG emission reductions in maritime transport.

The use of low- and zero-carbon alternative fuels, including biofuels, presents an immediate solution with a significant reduction potential. The development and uptake of these fuels will be critical for achieving a more sustainable future for maritime transport.

For transforming waterborne transport more sustainable and environmentally friendly, a reliable and predictable legal framework is the key. Maritime investments are long-term, 25-30 years, and high-risk. There must be supportive legislation in order to steer the investments to the right direction. In addition, the distribution, storage and bunkering infrastructure of low- and -zero carbon fuels need to be secured.

For securing the necessary supply of low- and zero-carbon fuels, a sufficient scale of production is needed. A supportive legislation, such as RED II, is the key to create a framework for demand and thus enabling production capacity investments.

This initiative has a holistic approach and considers several options such as extending the EU ETS, tax exemptions etc. At this stage, the policy options outlined are however quite vague and not at the same level of maturity.

A flag-neutral approach helps to ensure a level playing field for shipping companies and brings several advantages, for example preventing potential carbon leakage.

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