



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

[ReFuelEU Aviation - Sustainable Aviation Fuels \(/info/law/better-regulation/have-your-say/initiatives/12303-ReFuelEU-Aviation-Sustainable-Aviation-Fuels\)](/info/law/better-regulation/have-your-say/initiatives/12303-ReFuelEU-Aviation-Sustainable-Aviation-Fuels)

We appreciate this important initiative on sustainable aviation fuels (SAF) and the opportunity to comment. This initiative will help to achieve reductions in GHG emissions from aviation.

The use of SAFs present an immediate solution with significant reduction potential. The wide-spread use of SAFs, in combination with other measures, will be critical for the improvement of the environmental footprint of the sector and achieving a more sustainable future for aviation.

In order to ensure that the aviation sector can benefit from this, the EU and its Member States will need to support the supply and demand of SAFs in the EU in order to overcome the existing challenges. Technological innovation and advancement will provide the basis for further carbon emission reduction opportunities for the mid-to-long term.

We agree that competition and market issues must be guarded to avoid distortions. We still believe that the EU state aid rules should allow for forceful economic interventions in this area to meet the ambitions on climate and environment of the EU.

Technology neutrality as well as sectoral neutrality are important principles, i.e. the Commission should promote biofuels in all transport sectors equally. If revised, because of the ambition level of the European Green Deal, REDII Annex IX should not be opened. It should be confirmed, however, that eligible and sustainable waste and residue feedstock can be included in Annex IX with reasonable bureaucracy. We strongly agree that there is no need to develop specific sustainability requirements for aviation. All sustainable feedstock/biofuels complying with RED II are needed and there are waste and residues not mentioned in RED II Annex IX that are eligible and reduce GHG emissions.

A wide feedstock availability and technology neutrality are crucial for increasing the use of biofuels in aviation. The policy options and combinations of measures mentioned seem to be relevant and comprehensive in order to improve the environmental footprint of aviation.

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