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Feedback from:

Bioenergia ry - the Bioenergy Association of Finland

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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 number174042620514-51 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51&locale=en>)**Country of origin**

Finland

Initiative[2030 Climate Target Plan \(/info/law/better-regulation/have-your-say/initiatives/12265-2030-Climate-Target-Plan\)](/info/law/better-regulation/have-your-say/initiatives/12265-2030-Climate-Target-Plan)

The Bioenergy Association of Finland supports the objectives of the EU Green Deal, including climate neutrality by 2050, healthy ecosystems in the EU, improved competitiveness for European industries and higher energy security.

A broad global coalition of countries implementing ambitious climate policies together should remain as the overall goal for EU's climate diplomacy as this is the only way to make a meaningful dent on global emissions. The EU has succeeded in leading and should continue to lead and push for progress in such a broad coalition through its own convincing policies. A broad coalition of ambitious countries would also create a demand pull for cutting-edge clean technologies and products developed in the EU and elsewhere. Whether such a coalition exists or can reasonably be extended in the near future should be taken into account, when the EU re-examines its 2030 emissions reduction target.

We believe it is a good basis that the initiative will assess the economic, social and environmental impacts and provide elements of the overall broad architecture of policy measures across sectors to achieve the revised climate ambition. This should include proposals for:

- the 2030 emissions reduction target based on its analysis
- the revised EU ETS emissions reduction target (EU level) and its possible extensions
- the revised target for the effort sharing sector (EU level)

The clear focus of the increase of the 2030 target must be in emissions reductions, in particular in lower use of fossil fuels. We do not believe the LULUCF regulation or the RED2 Directive should be reopened at this stage. Regarding extensions of the EU ETS, we consider intra-EU maritime transport as an option. We do not support extension of the EU ETS to the road transport sector in the 2021-2030 timeframe.

The legislative proposals that the Commission plans to review by June 2021 include all the relevant climate and energy legislation agreed over the past few years. We note that there are two kinds of legislations that are listed. Whereas the EU ETS and Effort sharing deal with emissions reduction targets, there is also legislation listed, such as the RED2 and energy efficiency directives, which rather deal with the rulebook on how those targets are met. The LULUCF regulation contains both elements. We believe the focus of implementation of a potential increase in the 2030 target should be in amending the targets. The rulebook was very recently agreed and the RED2 and energy efficiency directives should not be reopened now, since any such move would slow down investment.

It is also worth noting that in its proposal for European Climate Law in March 2020, the Commission deliberately excluded the option of reducing emissions or increasing removals outside EU's borders. Such framing almost automatically implies a higher price of carbon and higher mitigation costs for the EU. This applies also for the 2030 timeframe. Higher ambition in the 2030 target could be achieved (with the same cost) if the EU partly allows emissions trading beyond its outer borders.

What is also planned to be assessed in the initiative is how the EU can increase the absorptions of CO₂ emissions over time, “including in its natural sinks and the role of biomass-based products and nature based solutions”. Technological solutions like BECCS/BECCU are not mentioned, even if the Impact Assessment of the 2018 long-term climate strategy communication highlights the importance of these in achieving the 2050 climate neutrality target. We believe the initiative should already outline how the Commission plans to proceed in order to enable and support these technologies in the 2020-2030 timeframe. This should also include a description of the objectives and framing of the forthcoming “Regulatory framework for the certification of carbon removals” (planned for 2023) and its proposed link to the 2030 energy and climate framework.

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