



## Feedback from:

Bioenergia ry - the Bioenergy Association of Finland

**Feedback reference**

F515162

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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**

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

**Country of origin**

Finland

**Initiative**

[Revision of Alternative Fuels Infrastructure Directive \(/info/law/better-regulation/have-your-say/initiatives/12251-Revision-of-Alternative-Fuels-Infrastructure-Directive\)](/info/law/better-regulation/have-your-say/initiatives/12251-Revision-of-Alternative-Fuels-Infrastructure-Directive)

The Bioenergia Association of Finland welcomes the opportunity to provide feedback to this initiative.

We believe regulation should be first and foremost technology-neutral by defining the target but not the technical means to achieve it. Alternative fuels are clearly an important means to reduce harmful effects of transport. Alternative fuels should not be mainly based on fossil fuels, but should clearly include sustainable biofuels (HVO, biodiesel, ethanol, LBG, SNG etc.) and biomethane (CBG).

The market for alternative fuels is still in a relatively early development phase and the overall market share of vehicles using alternative fuels is still relatively low. It will unnecessarily remain so unless legislation gives vehicle manufacturers incentives to develop and manufacture combustion engines enabling the utilisation of high blended and pure biofuels and biomethane.

This is possible by considering the use of renewable diesel (HVO), E85 and biomethane when defining European vehicle emissions standards. Vehicles using pure biofuels should for a good reason be considered as zero- or low-emitting vehicles.

Developed combustion engine technologies together with high blended biofuels ensure vehicles on EU roads are clean over their lifetime in the coming decades.

We want to accelerate the shift to sustainable and smart mobility. The use of high blended biofuels (including biomethane and synthetic methane, SNG) is one of the cost-effective ways to contribute to the enhanced emissions reduction target for 2030 now planned in the Commission. New effective vehicles using high blended alternative fuels such as HVO, E85, biomethane or SNG should be considered as low-emission vehicles.

Regulation should be put in place to promote the manufacturing of engines with high efficiency and the use of high-blended or pure alternative renewable fuels. This market of alternative fuels will develop much faster in the future and the rising share of alternative fuels will accelerate the growth of the low-emission and zero-emission vehicle fleet.

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