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## Feedback from: Bioenergia ry - the Bioenergy Association of Finland

**Feedback reference**

F554002

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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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Finland

**Initiative**[EU renewable energy rules – review \(/info/law/better-regulation/have-your-say/initiatives/12553-EU-renewable-energy-rules-review\)](/info/law/better-regulation/have-your-say/initiatives/12553-EU-renewable-energy-rules-review)

Bioenergy accounts for almost 60% of the current EU renewable energy consumption and according to the European Commission Long Term strategic vision, and other scientific literature, its contribution to the EU energy mix can grow in the next decades through an improved mobilisation of sustainable feedstocks.

It should be noted that adoption of RED II was the result of an inclusive legislative work, and reflects a valid political compromise reached between Member States and European Parliament as recently as in 2018. Full-fledged revision of the Directive at this stage seems to be neither needed nor justified in order to respond to the enhanced EU 2030 climate target. Further, such revision could easily create drastic uncertainty for renewable energy market development on the verge of implementation in Member States. Member States and business operators all over Europe now need stability in the coming years.

We believe the best way to enhance EU 2030 climate target is to provide new and robust targets for emission cuts, in particular in the EU ETS and ESR sectors. This will help the EU in getting rid of fossil fuels cost-effectively and leaves space for competition of various low carbon technologies, rather than micromanages the market. The current RED II legislation already aims at certain achieved minimum increases of renewable energy in all Member States.

In the road transport sector, a cross-sectoral emission trading scheme approach would eliminate the incentive to invest in first-of-their-kind production units, as the ETS price level for allowances is very unlikely to provide the economic attractiveness needed to operate these units profitably. That's why the EU ETS would not be the right instrument for fulfilling the emission reduction needs in this sector.

One of the aims this IIA mentions is to ensure security of supply of energy in EU. To this end the Commission should consider and evaluate how supply of EU domestic biomass for energy is secured at the end of 2020s' and post-2030. Important for EU industries, too, is to closely monitor how implementation of sustainability criteria of imports from non-EU countries is achieved in the coming years. In-build assessment of REDII in 2023 comes rapidly, but it should serve as an evaluation whether the directive functions as intended. Earlier assessment than in 2023 is redundant. The Bioenergy Association of Finland is of the opinion that major changes on the current sustainability criteria effective before 2030 would be harmful.

Among the policy options briefly outlined by the European Commission's roadmap, Bioenergy Association of Finland would therefore favour option 1, no policy change. If revision of the Directive is nevertheless deemed necessary, it should only be about increasing the targets - e.g. the overall renewable energy target and the 14% sectoral target for renewables in transport to 24% by 2030.

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