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Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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The Bioenergy Association of Finland

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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

[Climate change – updating the EU emissions trading system \(ETS\) \(/info/law/better-regulation/have-your-say/initiatives/12660-Climate-change-updating-the-EU-emissions-trading-system-ETS-\)](/info/law/better-regulation/have-your-say/initiatives/12660-Climate-change-updating-the-EU-emissions-trading-system-ETS-/)

The Bioenergy Association of Finland supports a well-prepared transition towards EU's climate neutrality by 2050. Climate change is a transboundary problem, where coordinated EU action can supplement and reinforce national and local action efficiently.

The EU ETS will be an important - if not the most important - tool to implement the enhanced 2030 Climate Target and to effectively launch the monumental effort to achieve climate neutrality and, eventually, negative emissions in the EU. The EU ETS has proven its ability to reduce greenhouse gas emissions in the Union. It is technology-neutral and provides plenty of flexibility for its participants to fulfil the related obligations. The Bioenergy Association of Finland therefore strongly supports significantly strengthening the EU ETS and reviewing the rules for the Market Stability Reserve in the context of enhanced 2030 ambition.

We do not support extending the EU ETS to road transport sector before 2030. The potential extensions of the EU ETS should not weaken the incentives currently in place for low carbon energy in Member States.

Bioenergy Carbon Dioxide Capture, Use and Storage (BECCUS) plants can be very useful tools for the EU in achieving its long-term objectives, as they can create an energy system with negative emissions. An essential barrier for BECCS facilities in the current ETS framework is the lack of incentives for capturing and storing CO₂. We therefore warmly welcome the intention of the Commission to improve support for low-carbon and carbon removal investment as part of the ETS revision. Even if the most BECCS potential might materialize after 2030, it is important to send the right signal for the industry now and fix the incentives already for 2020s'. We already have some significant BECCS projects in the pipeline in Europe. These projects should be enabled and supported to gain practical experience from this promising technology and to ensure technological progress in the learning curve.

We look forward to the Commission analysis on incentives for carbon removal in the context of the EU ETS. The analysis should include the option to have new incentives for BECCS within the EU ETS as well as in a separate incentive system. It is also useful that the Commission assesses the different EU ETS-based support instruments regarding incentives for carbon removal. The analysis and the legislative proposals due in June 2021 should ideally also make clear the overall view of the Commission on progress with carbon removal in the EU. We refer here in particular to the forthcoming carbon removal framework, which the Commission has announced for 2023.

It is also worth noting that the revised Renewable Energy Directive will ensure that only sustainable solid and gaseous biofuels will have zero emission factor in the EU ETS as of January 1st 2022.

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