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

### Feedback reference

F1291767

### Submitted on

26 November 2020

### 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

Land use, land use change & forestry – review of EU rules (</info/law/better-regulation/have-your-say/initiatives/12657-Land-use-land-use-change-forestry-review-of-EU-rules>)

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.

A profound question in the proposed revision of the LULUCF regulation is its envisaged contribution to the enhanced EU 2030 Climate Target. The LULUCF sector is the only economic sector that deals with both emissions and removals and – as a whole – provides net removals i.e. negative emissions in the EU. In 2018, the net removal was around 294 Mt, which is around 7 % of EU's GHG emissions (without LULUCF).

It is important to stop to think what the “polluter pays” principle means in the context of enhanced ambition in such a sector. Does an entity that removes carbon from the atmosphere – and thereby provides a societal benefit - have the same obligations to contribute as an entity emitting more carbon into the atmosphere? The Bioenergy Association of Finland believes the essence of the “polluter pays” principle suggests that reducing greenhouse gas emissions in the EU e.g. through the EU ETS and the ESR must be the primary objective of the EU 2030 Climate Target. Enhancement of carbon sinks – be it natural or technological – should rather be incentive- than obligation-based and of complementary nature.

We therefore object to Option 1 in the Inception Impact Assessment, as it would lead to further obligations for entities that are already generating negative emissions for other entities in the EU. It is important to recognize that opportunities to remove carbon or avoid emissions in the land sector are unequally distributed across the EU and that the economic significance of the land sector varies widely in different Member States.

We strongly support incentives to substitute fossil-based materials with bio-based ones. Links between the LULUCF sector and other sectors (EU ETS, ESR) can be re-examined and potentially strengthened as proposed in Options 2 and 3.

We believe it might be useful and also possible to introduce a carbon balance accounting system that would be solid enough to incentivise land managers for removals. In this context we want to emphasize the role of good forest management and many opportunities to increase carbon sequestration relying on improving management practices.

Along with the options outlined it is essential to further develop and strengthen the MRV requirements of the LULUCF sector and put effort on making it more coherent with other policies.

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