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

### Feedback reference

F1291933

### 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

[National emissions reduction targets \(Effort Sharing Regulation\) – review based on 2030 climate target plan \(/info/law/better-regulation/have-your-say/initiatives/12656-National-emissions-reduction-targets-Effort-Sharing-Regulation-review-based-on-2030-climate-target-plan\)](#)

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.

We note that the revision of the Effort Sharing Regulation (ESR) is closely linked to decisions taken with regard to the EU ETS and LULUCF. 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.

In the context of the ESR revision and regarding the inception impact assessment of the Commission, we would support exploring Options 2 - 3. Additional flexibilities with regard to the EU ETS and LULUCF sectors should be explored. We believe Option 1 is too ambitious in this timeframe, in particular as the ESR was only recently agreed in the EU institutions.

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