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Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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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 number174042620514-51 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51&locale=en>)**Country of origin**

Finland

Initiative[Forests - new EU strategy \(/info/law/better-regulation/have-your-say/initiatives/12674-Forests-new-EU-strategy\)](/info/law/better-regulation/have-your-say/initiatives/12674-Forests-new-EU-strategy)

The Bioenergy Association of Finland believes a transition from fossil-based economy to a circular bioeconomy is needed. We believe the climate targets of the EU need to be achieved mainly by reducing emissions from fossil fuels. Natural carbon sinks can simultaneously be enhanced in the long-term, but they cannot be a replacement for emission reductions or actions to enhance technological carbon sinks in Europe.

The association aims to increase the share of renewable and domestic energy when Finland targets quitting the energy use of coal by 2029 and achieving climate neutrality by 2035. The use of energy peat in Finland is rapidly decreasing while the use of sustainable bioenergy is moderately increasing during 2020s' in transport and heating. The association aims at maximising the added value from biomass and enhancing exports of high-value, sustainable and even carbon-negative products. Energy enables the development of a circular bioeconomy and is derived from different side-streams from forest industry, forestry, agriculture and waste management.

Regarding the new forest strategy, we would underline that the strategy needs to be holistic and – as the role and economic significance of forests around Europe are vastly different - respect the subsidiarity principle of EU legislation. It is important that the added value of the forest strategy with regard to all the other EU initiatives, such as the biodiversity strategy, the adaptation strategy and the LULUCF regulation is identified early. We note that the significance of forests as a basis for economic activity is not dealt with in other initiatives and believe the forest strategy can be the key instrument to address environmental, economic and social needs all at the same time. We would particularly highlight the importance of combining economic, biodiversity and adaptation objectives and note that the greenhouse gas emissions and removals are already adequately addressed through the LULUCF regulation, Effort Sharing Regulation and the EU emissions trading scheme – all of which are currently under review in the Commission.

The Standing Forestry Committee should continue to be a useful forum in forest-related policy issues, such as the design and implementation of the forest strategy.

The roadmap envisaged by the Commission for development of the forest strategy seems to ignore the significant role of side-stream biomasses from forests in the European energy system and, in particular, in some specific Member States. Bioenergy from various side-streams must be maintained as part of the forest strategy for two important reasons: 1) the European energy system still heavily relies on fossil energy and sustainable forest-based bioenergy can help reducing this key problem and 2) sustainable bioenergy combined with a carbon dioxide capture, use and storage can create a negative-emission system, which are highly lucrative in fulfilling EU's long-term climate aims and responding to the Paris Agreement.

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