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Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

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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)

Transparency register number[174042620514-51 \(http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51&locale=en\)](http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51&locale=en)**Country of origin**

Finland

Initiative[Energy efficiency – Revision of the Energy Performance of Buildings Directive \(/info/law/better-regulation/have-your-say/initiatives/12910-Energy-efficiency-Revision-of-the-Energy-Performance-of-Buildings-Directive\)](/info/law/better-regulation/have-your-say/initiatives/12910-Energy-efficiency-Revision-of-the-Energy-Performance-of-Buildings-Directive)

Bioenergy Association of Finland considers that general emission reduction targets in the ETS and ESR sectors should be the main drivers for action in companies and member state policy actions.

Higher emission targets would bring concrete efficiency gains, as they indirectly incentivise improving energy performance, either through building renovation, renewing current heating systems, or transforming the energy systems.

The first round of national energy and climate plans showed an insufficient level of ambition in Member States to decarbonise the heating and cooling sector, which accounts for half of energy consumption in the European Union. The residential sector accounts for 21% of EU energy consumption and the building sector needs a stable framework to close the gap which is evident based on the presentation of the long-term renovation strategies by Member States. In addition, there is a need for national governments to increase their NECP's heating targets.

We consider higher targets for renewable heating and cooling should be accompanied with non-binding measures in the Energy Performance of Buildings Directive (EPBD, option 2 of the inception impact assessment).

Imposing ever more bureaucratic energy labelling or calculation requirements on building owners is not the right policy avenue. It is much more important to ensure affordable financing and subsidies to speed up building owners' planning and to push it into action. When the investment shows a clear ROI in less than 10 years, the results are guaranteed.

While heating and cooling represent half of the EU energy consumption, just 22% of this is renewable. More than 80% of renewable energy is provided by bioenergy. Biomass has also been recognised as the only cost competitive technology in the European Commission's report on Competitiveness of the heating and cooling industry and services, having the potential to further reduce utilities bills to consumers, thus addressing energy poverty.

There is no technology bottleneck to increase RES and low carbon District Heating in buildings with many solutions using solar, biomass or ground/ambient heat, sometimes in a hybrid system. Biomass equipment is now more and more efficient with very low emissions, ready to replace old appliances. What we need is a strong signal from the EU, going down to the country and local levels.

In this sense, the Bioenergy Association of Finland believes the EPBD can be a bridge to achieve the new renewable and climate targets through a smooth implementation of the strategies until 2026 where further measure should be taken to be sure the new building stock is 100% renewable.

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