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Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

F2750997

Submitted on

08 November 2021

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

Finland

Initiative[CO2 emissions for cars and vans – revision of performance standards \(/info/law/better-regulation/have-your-say/initiatives/12655-CO2-emissions-for-cars-and-vans-revision-of-performance-standards_en\)](#).

The Bioenergy Association of Finland supports a well-prepared transition towards EU's climate neutrality by 2050. We appreciate this important initiative to the Amendment of the Regulation setting CO2 emission standards for cars and vans. Transport is the only economic sector whose greenhouse gas emissions are higher than in 1990.

The emissions are also growing. Hence transport has to contribute to the overall emission reduction of at least 55% by 2030 as set out in the Commission Communication on stepping up the EU's 2030 climate ambition. The revised CO2 standards will also contribute to modernize and make the automotive value chain more sustainable.

Accounting for Tank-To-Wheel emissions fails to recognize and therefore incentivize better fuels with lower Well-to-Tank performance and biogenic energy content. This should be corrected, as better fuels provide benefits in the context of both new and existing vehicles. Tank-to-wheel approach does not promote power-to-x fuels nor biofuels and will end R&D efforts in new engine technology for renewable liquid and gaseous fuels.

Biofuels are an immediate and cost-effective tool to reduce emissions of the existing and future light vehicles, in particular considering their number and lifespan in the vehicle stock. Their use should not artificially be limited to transport modes that cannot be electrified. Growing production of biofuels enables later a faster development in aviation and maritime transport. Such an approach will ensure a holistic approach to road transport decarbonization. We welcome the initiative of a new mechanism to take into account the potential contribution of renewable and low-carbon fuels (including power to x) when determining manufacturers' compliance with their targets, including the option of voluntary crediting mechanism. The concept of having a crediting system could allow fuels suppliers and car manufacturers to synergize and boost the demand of renewable fuels and the decarbonization of transport.

The definitions of zero-emission and low emission cars should be revised considering the use of sustainable biofuels. Renewable and low-carbon fuels (such as sustainable biogas, biomethane and biofuels, renewable and low-carbon hydrogen or synthetic fuels) should be taken into account, as long as they meet the minimum sustainability criteria set under the Renewable Energy Directive.

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