



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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The Bioenergy Association of Finland

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Organisation

Bioenergia ry - the Bioenergy Association of Finland

Organisation size

Micro (1 to 9 employees)

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Finland

Initiative[EU energy efficiency directive \(EED\) – evaluation and review \(/info/law/better-regulation/have-your-say/initiatives/12552-EU-energy-efficiency-directive-EED-evaluation-and-review_en\)](#)

Bioenergy Association of Finland supports the aims of the EU Green Deal and the objective of reducing net greenhouse gas emissions by 55 % by 2030. It is quite clear that achieving this objective also requires a significant improvement in energy efficiency around Europe.

Nevertheless, it is disappointing that the Commission in the Fit-for-55 package did not focus on setting emission reduction targets for the EU ETS, ESR and LULUCF sectors and supporting that with e.g. financing tools. Instead, the Commission also decided to reopen – again – the RED and EED Directives. The Commission proposal is regrettably based on low trust in the ability of the market economy – or Member States – to find effective solutions, increasing EU influence within Member States' national policies and EU-level micromanagement of several sectors. This leads to ineffective and overlapping policies, more bureaucracy and decreased flexibility at the Member State level.

Particularly, we would raise the requirements set in Article 24 for production of efficient district heat and cooling as unnecessarily detailed in a situation, where the sector is already incentivised by the EU ETS, energy taxation and renewable energy directive in their investments. It is also important to note that heat producers operate in volatile markets for fuels, electricity and emission allowances (EUAs). Fixed assumptions and rules on the fuel mix are not compatible with real world circumstances.

We also regret that the Commission has removed sorted waste from definitions for high efficient district heating and high efficiency cogeneration. Industrial wastes and waste gases are difficult to fully avoid in many industrial processes, even though the residual amounts can be significantly reduced. In the spirit of circular economy and resource-efficiency sorted waste and waste gases – having no other valuable uses – should be acknowledged as eligible fuels in high efficient district heating and high efficiency cogeneration.

It is also unfortunate that the proposal includes flat sector-specific goals for annual efficiency improvements around Europe without attention to the regional circumstances and impacts.

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