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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)

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

Finland

Initiative[Land use, land use change & forestry – review of EU rules \(/info/law/better-regulation/have-your-say/initiatives/12657-Land-use-land-use-change-&-forestry-review-of-EU-rules_en\)](#).

The Bioenergy Association of Finland welcomes the Commission proposal to revise the accounting methodology from 2026 onwards. Accounting becomes easier and more transparent and is consistent with the new formulation of the EU 2030 climate target adopted as part of the EU Climate Law.

We also support the phased approach (2021-2025, 2026-2030, 2030+) the Commission has presented. We believe the most important decision at this stage regarding the time beyond 2030 is, whether or not to introduce the AFOLU sector. While we are open to explore the introduction of the AFOLU sector, we underline that the target adopted for the AFOLU sector needs to be evaluated separately and as part of the overall climate architecture proposed for the 2030-2040 period.

The headline target (310 Mt) for 2030 seems consistent with the agreement achieved in negotiations on the European Climate Law. We note however that the target is significantly higher than the existing LULUCF sink and requires new policy measures. It is also important to note that this target, which is beyond the 225 Mt limit agreed in the European Climate Law, does not help in fulfilling the 2030 objective, but has been argued based on climate objectives beyond 2030. In a way, this is premature as all other climate objectives beyond 2030 (except 2050 climate neutrality) are still unclear and will be analysed and agreed later.

All Member States should participate in contributing to any carbon removal target and the level should not be further increased beyond 310 Mt as this would unduly punish economic activities in an already carbon-negative sector and let fossil-fuel fired economic activities refrain from responsibility. If ambitious carbon removal targets are set for forest-rich countries for 2030, there cannot be Member States, which do not have removal targets at all, but may generate additional emissions in the LULUCF sector. The bare minimum for all Member States is to achieve climate neutrality in the LULUCF sector by 2030 with or without the use of flexibilities.

We believe the method to determine the 2026-2029 pathways should be agreed at the same time as the 2030 targets for Member States. No delegated acts are needed here.

As the EU raises ambition in the LULUCF sector, it is important that the use of flexibilities is also enabled. All existing flexibilities between Member States and different sectors within a Member State should be retained, and potentially, new ones also explored - in particular between the LULUCF and Effort Sharing Regulation Sectors.

In Finland, peat has been extracted in drained areas with thick peat layer. Emissions from peat extraction in the LULUCF sector are now

declining rapidly due to the EU ETS and peat production sites are being restored or afforested.

Finally, we support the intention to extend the HWP article to new categories and would especially like to highlight the potential of biochar, where we already see positive development in many Member States, including Finland. Production of biochar can be fully integrated in the energy system so that the waste heat is fully utilized in a district heating/cooling system.

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