



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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

Finland

Initiative

[Social Climate Fund – supporting the EU’s transition to a fully green economy \(\(/info/law/better-regulation/have-your-say/initiatives/13125-Social-Climate-Fund-supporting-the-EU%E2%80%99s-transition-to-a-fully-green-economy_en\).](#)

The Bioenergy Association of Finland considers the proposed Social Climate Fund problematic from many aspects and cannot support the proposal. Member States are responsible for social policy and protection of vulnerable households. The Social Climate Fund would directly intervene with the social sector of the Member States. There should be a proper discussion on the core EU principles of subsidiarity and legitimacy and any decisions taken before the EU takes such a concrete role on social policy and paying subsidies for individual households.

We acknowledge the multitude of measures needed to achieve the Green Deal goals. However, social affairs and any direct compensations to households and individuals clearly belong to national policy and should be funded from national budgets. Social Climate Fund would require the revenues needed to pay back the loans of the Recovery and Resilience Facility. We consider the Social Climate Fund unjustified also because of the very recent Just Transition Mechanism and Just Transition Fund that are supposed to have similar goals (leave no one behind) - showing no evidence of results yet.

It is obvious that Social Climate Fund cannot provide sufficient, fair and responsible economic support to all who may suffer from transition to low-carbon society. This was concluded also by the European Economic and Social Committee. Those who have done already more for the climate transition may have to subsidize those who have not. The proposed model of sharing the costs and benefits is unfair and may even hinder development towards climate neutrality in the Member States with high climate ambition.

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