



Law

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

[Production of renewable transport fuels – share of renewable electricity \(requirements\) \(/info/law/better-regulation/have-your-say/initiatives/7046068-Production-of-renewable-transport-fuels-share-of-renewable-electricity-requirements- en\)](#)

Bioenergy Association of Finland believes that technology-neutrality is the premise that the EU can achieve energy independency from the Russian fossil fuels by 2030. This draft delegated regulation does not respect the principles of technology-neutrality and social equality. Nor does it recognise differences in regional conditions. Electricity produced by bioenergy is excluded from the definition of 'installation generating renewable electricity' when producing renewable hydrogen. Similarly, according to the draft regulation 'renewable hydrogen' cannot be produced from biomass. These definitions are not in line with the definition of renewable energy according to the IPCC and the EU in the RED3 Directive.

Given the non-neutral approach regrettably proposed in the draft regulation, it is worth noting that producing hydrogen from biomass or biomethane can be net carbon-negative in terms of life cycle emissions. (See Christian Bauer. 2022. Hydrogen from biomass with CCS – A carbon negative transport fuel?. 2nd international conference on negative CO2 emissions. 16.6.2022. Gothenburg, Sweden)

Creating a very detailed and restrictive regulatory framework for hydrogen will inevitably raise the system costs, disincentivize energy system integration and limit total potential by increasing investment risks.

Based on the draft delegated regulation, the Bioenergy Association of Finland is confident that the investments in RFNBO fuels in the EU cannot materialize in the planned extent because of

- Lack of technology neutrality and the resulting efficiency loss
- The Nordic countries' electricity grid is almost fully climate-neutral thanks to a large variety of carbon-neutral energy sources
- the extreme market situation where all electricity is strongly needed because of the war in Ukraine.
- The proposed draft EU regulation requires very stringent real-time, physical matching between the generation and consumption of renewable electricity, when consumed for RFNBO hydrogen production. The balancing period should be extended to at least one month.

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