



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

F3373917

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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[Biofuels – updated list of sustainable biofuel feedstocks \(/info/law/better-regulation/have-your-say/initiatives/13484-Biofuels-updated-list-of-sustainable-biofuel-feedstocks_en\)](#)

We welcome the increased pool of feedstocks. The European Commission is empowered to amend the list of feedstocks set out in Parts A and B of Annex IX by adding, but not removing, feedstock. However, the European Commission, in its draft delegated act, is disincentivizing the production and use of related biofuels when adding feedstocks to Annex IX-B (contribution to the transport targets limited to a maximum of 1.7%) and excluding them from Annex IX-A, with a subtarget. The proposed amendment to move the listed feedstocks from part A to B creates business uncertainty and disruption for a novel industry that is trying to scale up. This is also against the objective of the Annex IX review, which aims to ensure investments predictability. If new items are added to the B-part, then also the limit value of 1.7 % would need to be raised up. We suggest adding intermediate/cover crops to list A, because it is still very challenging to show a business case for their utilisation. Their definition should also be simplified, as the proposed definition is too complex and impractical to assess. The definition should leave more room for local assessment, for example, as follows: "(p) Intermediate crops, such as catch crops and cover crops provided the soil organic matter content is maintained."

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