



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

Finland

**Initiative**[Energy efficiency – reference values for calculating energy savings through cogeneration \(update\) \(/info/law/better-regulation/have-your-say/initiatives/13441-Energy-efficiency-reference-values-for-calculating-energy-savings-through-cogeneration-update- en\)](#)

As has been seen since 2021 the reliance on fossil fuels has proved to pose a dangerous shackle for European societies. Great majority of global natural gas reserves originate from non-democratic countries. This reliance must be cut starting with new plants and in the electricity production where abundance of better options is available. Therefore, neither fossil natural gas nor other fossil fuels should be eligible in regular use in newly commissioned plants from 2024 (Annex I-II). Instead, renewable fuels, synthetic gases, green hydrogen, and waste-based fuels should be possible from 2024. The tables on Annex I - II should be changed accordingly. The Bioenergy Association of Finland emphasises that non-fossil gases, such as biomethane, synthetic gases and gases based on thermal gasification should be favoured and their use in old and new plants promoted in Union legislation. Additionally, we note that on category S6 (Municipal and industrial waste), the efficiency value 25 % is to remain the same as it has been for a very long time. This efficiency value does not reflect in any way the technological development or BAT, nor actual investments made in several countries. Therefore, we propose the efficiency value to be raised to 28-30 %.

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