



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

F3407248

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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[Reducing packaging waste – review of rules \(/info/law/better-regulation/have-your-say/initiatives/12263-Reducing-packaging-waste-review-of-rules_en\)](/info/law/better-regulation/have-your-say/initiatives/12263-Reducing-packaging-waste-review-of-rules_en)

Bioenergia ry, the Bioenergy Association of Finland, believes that favouring reusable packaging at the expense of recyclable alternatives risks promoting fossil-based material cycles vs. bio-based material cycles. Such an approach fails to identify the benefits of replacing fossil materials. Bio-based industrial processes and the related forestry typically also generate renewable wastes and residues that are fully compatible with and can be utilised in a carbon-negative (or climate-positive) energy system. It is also worth noting that the Commission has only recently launched the consultation for the 2040 climate target and is only about to launch a consultation for the CCUS-vision of the EU. Too rigid rules for reducing packaging waste can therefore turn out to be counterproductive. Reuse and Recycling should be seen as complementary solutions. Sufficient flexibility should be left for Member States and companies to assess the best ways to address overall environmental impacts of packaging.

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