



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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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 carbon emissions – review of emission standards for heavy-duty vehicles \(*/info/law/better-regulation/have-your-say/initiatives/13168-Reducing-carbon-emissions-review-of-emission-standards-for-heavy-duty-vehicles_en*\)](#)

The Bioenergy Association of Finland welcomes the revision of the CO standards for HDVs in line with the Fit for 55 objectives and believes that a recognition of all CO emission reduction pathways along the entire value chain is critical. Decarbonisation is an immediate challenge and all options that can have a rapid impact need to be enabled. HDVs are responsible for 28% of greenhouse gas emissions from road transport in Europe. In Finland, the proportion is even higher. Depending on the use, technology diversity is needed where all technologies, including electrification/hybridisation, hydrogen and sustainable and renewable fuels can play a role. EU should aim to curb emissions from new heavy-duty vehicles in a cost-effective way that would reduce the EU consumption of fossil fuels, the most of which are imported. The EU should make the best use of domestic renewable solutions, while maintaining the EU's technical and industrial leadership in powertrain technology. By focusing only on the tank-to-wheel part of the vehicles lifecycle, the methodology fails to account for the full environmental footprint of road transport regardless of the societal and environmental cost. Targets should be formulated to represent the full life-cycle emissions of putting a new vehicle on the road i.e., account for the well-to-wheel emissions of the energy carrier, distinguish between fossil and biogenic CO₂, and consider the production/end of life of the vehicle. The CO₂ standards should be designed to incentivise all genuinely efficient alternatives including powertrains running on low Well-To-Tank emissions/high biogenic content energy carriers. If grounded on a solid and non-discriminatory methodology, the CO₂ standards could provide the critical push to encourage all alternative fuels to improve their environmental performance. The standard must secure the availability of HD vehicles with combustion engines for long distance heavy transports in rural areas considering also challenging topography and wintertime in challenging heavy transports. This can be implemented by leaving the heaviest vehicles outside the scope of the regulation, as well as agricultural and forestry machines. Vehicle categories used for pulling the heaviest and longest loads in Finland, are only marginally used in Central-Europe. It is important that the extension of the coverage does not set back the energy-efficiency gains already reached. Calculation measures currently used do not recognise the emission reduction per tonne-kilometre in the heaviest vehicle categories.

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