



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

F3454088

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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

[EU forests – new EU Framework for Forest Monitoring and Strategic Plans \(/info/law/better-regulation/have-your-say/initiatives/13396-EU-forests-new-EU-Framework-for-Forest-Monitoring-and-Strategic-Plans_en\)](#)

The proposed regulation aims foremost at increasing the resilience of the European forests. This aim is supported by the Bioenergy Association of Finland. Resilience and diversity are a prerequisite for healthy forests that sequester carbon and provide multiple products and services to the society. Energy is one of these services. The association represents the entire bioenergy sector in Finland from land ownership to forest and energy companies, as well as technology and research in the field. In general, we consider the extent of the proposal unsubstantiated. We question the need for an overlapping EU regulation that focuses on data needs for purposes already regulated through other existing union legislations, namely the governance regulation and the RED3 directive. We support openness on collecting national data on wood use for bioenergy. We believe there is a need for increased consistency between Member States in this matter. A unified approach would facilitate aggregated information of higher quality. However, we do not believe that remote sensing would deliver sufficiently reliable data on this. Ground level information gathering is still required. We believe that field inventories continue to be the most accurate and reliable data sources for forest monitoring. Remote sensing should be seen as a complement for conventional methods. Also adequate support from Member States to validate collected data must be reinforced. Data collection level required in Annex II n i) on bioenergy is extremely detailed when divided on user levels. It is foreseen that this level of information would be very challenging for some Member States, if also divided to levels required by regulation EU 2018/1999. The Bioenergy Association of Finland calls for more aggregation of the information to achieve a level playing field.

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