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# Feedback from:

# Bioenergia ry - the Bioenergy Association of Finland

#### Feedback reference

F521838

#### Submitted on

02 June 2020

#### 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

Development of Euro 7 emission standards for cars, vans, lorries and buses (/info/law/better-regulation/have-your-say/initiatives/12313-Development-of-Euro-7-emission-standards-for-cars-vans-lorries-and-buses)

We welcome this opportunity to provide feedback on the roadmap regarding the creation of a new Euro 7 emissions standard.

We strongly endorse this initiative that supports the Green Deal and helps to ensure that vehicles on EU roads are clean not only during the initial assessment but over their entire lifetime at any typical usage. Any simplifications of the test procedure should be evaluated very carefully. On the other hand – any evaluation of more stringent limits must start with a careful assessment of the real benefit for air quality.

Current Euro 6d-temp vehicles already have a very good local emission performance (see attachment). The issue with air quality is more about the older fleet of vehicles still on the road.

The air quality problem is typically more severe in city areas. The limits must therefore serve urban air quality. Non-urban applications should not be unduly affected by costly solutions without a clear and demonstrated benefit in air quality.

In proposing new limits for pollutants, the Commission should carefully look at their impacts on air quality while assessing social and economic impacts. The assessment should prioritize solutions that are economically and technically available. Affordable mobility is a key contributor to the quality of life of European citizens and is an important parameter of a healthy economy.

Further optimization requirements for vehicles must bring about a clear benefit both to health and to the environment. Improvements that have only a marginal benefit, but simultaneously make mobility disproportionately expensive, must be avoided.

The roll-out of new power trains is accelerating, but it is still too slow. The Euro 7 standard can serve the development of more efficient and clean combustion engines.

Quality of fuel used has played a fundamental role in enabling cleaner cars. The Euro 7/VII regulation should enable, and if possible, even promote the use of alternative renewable fuels. Renewable fuels are a fast and cost-effective solution for reducing CO2 emissions in transport, mobile machinery and some stationary applications. Any regulation preventing the use of renewable fuels should not be put in place as long as the limits for local emissions are met. Regulation should be technology-neutral defining targets, but not the means to achieve them.

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Picture 1: The benefits from earlier Euro standards are obvious. Further improvements might lead to high costs related to the benefits. Clear variation comes from the quality of fuels (blue area). Source: Trafikverket, Sweden

# Effekter av bränsle

