



Law

Feedback from: Bioenergia ry - the Bioenergy Association of Finland

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Submitted by

The Bioenergia Association of Finland

User type

Business association

Organisation

Bioenergia ry - the Bioenergia Association of Finland

Organisation size

Micro (1 to 9 employees)

Transparency register number

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Country of origin

Finland

Initiative

[Energy efficiency – assessing the level of EU & national funding \(/info/law/better-regulation/have-your-say/initiatives/13824-Energy-efficiency-assessing-the-level-of-EU-national-funding_en\)](#)

The planned report will provide an overview of the existing financing landscape in the European Union, assess its effectiveness and efficiency, its capacity to leverage private financing and ultimately to reach the EU energy efficiency targets. It aims to clarify the panorama of public funding for energy efficiency in Europe, and intends to highlight good practices with a potential for replication. Bioenergia ry the Bioenergia Association of Finland - welcomes such a report as a useful tool to inform EU-level and national policies in particular, in highlighting best practices. Our key messages: 1. Predictable policy environment is important. Retroactive changes to adopted policies deteriorate the investment environment. 2. The call for evidence states that there is currently no dedicated funding targeting exclusively energy efficiency in any of the large EU funding programmes. According to the call, Energy efficiency is therefore in competition with other priority sectors. We believe such an approach is misleading and should be reconsidered. Energy efficiency greatly contributes to achievement of goals e.g. in the EU ETS and Effort Sharing Sectors. On the other hand, an ambitious emissions reduction target can similarly promote also energy efficiency. 3. In the 2030s the EU climate and energy policies should clearly focus on greenhouse gas emissions and not on fragmented, separate policies like renewable energy, energy efficiency, sectoral or technological policies. 4. The Bioenergia Association of Finland emphasizes the importance of technology-neutral approach in EU policy making. Creating lists of the proper technologies or solutions to reach the mid- to long-term climate goals years ahead is by no means the optimal method. There is no certainty regarding the best solutions in the years to come and these solutions should be determined by markets and technological development and not by political decisions. R&D support is, however, key for all sustainable technologies. 5. In promotion of energy efficiency, operating models combining well-functioning voluntary agreements with mobilisation of private finance, via e.g. specialised investment funds, for projects with slightly longer payback times are promising. 6. Bio-CHP plants operate with high energy efficiency, are important for EUs energy security (95 % of energy biomass is domestic) and are fully compatible with a carbon-negative future, when accompanied with CCUS-technologies. District heating networks can serve as future-proof platforms for a comprehensive energy transition, and the Nordic countries can among others provide a lot of interesting recent or on-going examples here ranging from industrial heat pumps to energy storage, to waste heat utilization, to hydrogen economy and to bio-CCUS technologies. Energy efficiency policies should recognise the value of CHP and district heating networks and not unnecessarily deteriorate their operating environment. 7. Modernisation of the current stock of biomass heating appliances with new appliances would bring great energy efficiency benefits - and in conjunction with decreasing air pollutant emissions. Very often the owners are elderly or low income households, and public intervention could ease financing and lower the threshold for investment.

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