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## Feedback from: Bioenergia ry - the Bioenergy Association of Finland

**Feedback reference**

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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 environmental law – 2025 implementation review \(/info/law/better-regulation/have-your-say/initiatives/14254-EU-environmental-law-2025-implementation-review\\_en\)](#)

As the recently adopted Strategic Agenda 2024-2029 clearly shows, the EU faces multiple challenges in a very unstable geopolitical situation. We have serious concerns regarding the EU's security and competitiveness in addition to the well-known environmental challenges, which are also growing worse. In this context, Bioenergia ry - the Bioenergy Association of Finland would like to highlight, in particular, two major issues for the 2025 EIR. First, the amount of new environmental legislation in the energy sector significantly increased in the 2019-2024 period. Implementation of all this legislation (within the foreseen deadlines) has already proven to be challenging and not only in Finland, but in many other Member States and in the Commission, too. Unclear legislation and missing guidance for implementation has increased confusion and uncertainty in many businesses. The new legislation will in many cases also increase administrative burden also in small companies. All this will have negative impacts on investment, competitiveness and employment. At the same time, the amount of legislation and the length and detail of this legislation does not always imply optimal environmental outcomes as a result. We would therefore hope that in its next EIR, while maintaining its environmental ambition the EU would seriously pay attention to - simplification of legislation and avoidance of unnecessary micromanagement - true neutrality regarding the use of different technologies to solve the problem at hand - cumulative impact of all adopted legislation in companies - realistic timelines for implementation of legislation. Second, investment is key for Europe's socioeconomic future, and also to solve many of our environmental problems. Licensing and permitting has widely been acknowledged as a bottleneck for investment and it has already been addressed in the 2019-2024 period. We fully support these and further measures to streamline licensing and permitting processes to make the EU a lucrative location for businesses to invest in environmentally friendly technologies. In Finland, the Confederation of Finnish Industries hosts a website (see below) of all green investments under preparation. The amount of projects and the potential total investment (269 billion) is formidable. While all of the projects are unlikely to move forward, a wise EU environmental policy can support realisation of a maximal number and a well-balanced portfolio of these transformative projects and help to minimise negative impacts. see: <https://ek.fi/en/green-investments-in-finland/>

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