



Law

## 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 rules on land use, land use change and forestry \(LULUCF\) – evaluation \(/info/law/better-regulation/have-your-say/initiatives/14227-EU-rules-on-land-use-land-use-change-and-forestry-LULUCF-evaluation\\_en\)](#)

It is clear that LULUCF removals have a role to play for the purpose of reaching the 2030, 2040 and 2050 climate targets. At the same time, Bioenergia ry the Bioenergy Association of Finland strongly supports the starting point in the Commissions communication (February 2024) that the role of technological carbon sinks needs to become more apparent after 2030. The LULUCF regulation does offer room for improvement. For Finland, the regulation has been a disaster from the very beginning. It starts from the fact that the sector is much more important for the Finnish economy, exports and net greenhouse gas emissions than for most other Member States. Nevertheless, this was hardly considered in the Commission proposal of 2016 or in the negotiations thereafter. In the reference period 2000-2009 the country was importing large amounts of wood from Russia. Imports decreased substantially since 2008 due to the Russian tax for wood exports and the financial crisis. In 2010s imported wood had to be replaced partly with additional domestic harvesting. Therefore, the reference period 2000-2009 was unfavourable for Finland from the start. The original 2018 version of the LULUCF regulation and the resulting framework for 2021-2025 is so complex and opaque that it is very difficult to assess or communicate its impacts for decision-makers. This is exacerbated by the fact that the emission inventory data in the LULUCF sector have very high uncertainties compared to the ETS and ESR sectors and the numbers may change until the last minute. Indeed, in Finland this scientific risk seems to have materialised and the estimated carbon removal for the most recent years has drastically reduced due to technical corrections (e.g. the data in the Finnish inventory for the year 2019 has ex-post - changed with 14 MtCO<sub>2</sub> due to corrections i.e. around twice the emissions of Finnish agriculture), while the data in the reference period have in this case not been affected. We underline that no surprise upsurge has taken place in harvests nor in the use of bioenergy. Due to these technical corrections, achieving the goal set in the LULUCF regulation for 2021-2025 is practically impossible now with domestic policy measures without irreparable damage to the economy. This kind of regulation is silly, arbitrary and thereby unfair - and clearly harmful for Finland and the EU. The updates made in 2023 for the period 2026-2030 were a move to the right direction. The accounting system became more transparent and understandable. It is good that the system allows for technical corrections in Member States accounted emissions and targets. It seems the headline target of 310 Mt for the EU in 2030 may have been too optimistic considering the quickly approaching finish line, the most recent number (2022: 236 Mt), the European concurrent realities e.g. with forest growth and forest damages, technical downward corrections in inventory data and the slow materialisation of environmental benefits from any policy measures in this sector. We deem it also questionable that there are no minimum requirements for Member States targets: even emission-positive targets are, for example, allowed, while other Member States are expected to contribute significant obligatory removals to the common EU basket. This could be called a Remover-Pays-Principle. There is a lack of a functioning marketplace or trading platform for LULUCF removals or annual emission allocations (AEAs). Such a platform could support effective decision-making in Member States and thereby better compliance.

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