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Ref: COMMISSION IMPLEMENTING REGULATION (EU) .../...of XXX amending Implementing Regulation (EU) 2018/2066 of 19 December 2018 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council

Finnish Energy's comments on the draft of Implementing Regulation on the monitoring and reporting of greenhouse gas emissions

Finnish Energy, the association representing Finnish companies that produce, acquire, transmit and sell electricity, gas, district heat and district cooling and offer related service, thanks for the possibility to provide feedback on the draft implementing regulation.

We support and highlight the use of forest industry by-products and wood residues for energy production, as the usage of sustainable woody biomass can make a meaningful contribution to climate change mitigation. We acknowledge the concerns that an increased EU biomass demand could also have negative impact on carbon sinks and biodiversity. Hence, a robust, harmonized and on time implementation of the new sustainability criteria by Member States and economic operators is crucial and these implementing rules are needed to facilitate functioning biomass markets.

We regret that it has taken very long for the European Commission to move forward with the implementation of the REDII sustainability criteria and the clarification on its application in the EU ETS. This amendment on the Implementing Regulation on the monitoring and reporting of greenhouse gas emissions is highly needed.

It must be highlighted that some Member states have acted on time and implemented the criteria in national laws and have thus been waiting for the EC to act for the past year. This applies to Finland, where the economic operators have been waiting for the EC to publish the guidance on examples of rules for the criteria and are still waiting while the deadline for the national implementation was on June 30th 2021. In Finland, the operators have done everything in accordance with REDII and national laws and are still waiting for the confirmation that this is enough, concerning also the application in the EU ETS. We also stress the immediate need for the EC to clarify that it is not expecting MSs to update national schemes in accordance with the implementing rules that the EC is providing only after the deadline for implementation has passed.

In regards of the draft of the Implementing Regulation, we see no reason to bring up the national taxation schemes or cascading use and waste hierarchy in this implementing regulation.

While now we're in the situation that postponing the application of the sustainability and greenhouse gas emissions saving criteria on ETS is crucial, this cannot lead on delaying all other delegated acts also. It is vital to get the implementation rules clarified in the first months of 2022. It is important to finally implement RED2 first and only after that think about the amendments on the directive. EC must further move the implementation date of the REDII sustainability criteria's application in the EU ETS, if the delegated acts are even more delayed.

Additional information

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