

Biofuel issues in the new legislations on the promotion of renewable energy

Public consultations exercise

Energy and Transport Directorate-General, European Commission

Comments of Vapo Oy, Finland

Question 1.1:

Yes, but we would like to propose some changes in the possible environmental sustainability criteria for biofuels: the amount of greenhouse gas savings should be 20 % and also the security of supply and self-sufficiency matters must be included in the criteria. In order to keep the things simple, the directive should not define any default values for different fuels, but the supplier of biofuels must prove the savings of greenhouse gases through LCA.

Question 1.2:

Certification and monitoring of certain raw material sources is needed. Part of the monitoring is, on the other hand, already normal practice of the greenhouse gas inventories of IPCC.

Question 1.3:

Commercial and technical as well as self-sufficiency and security of supply matters should be discussed and included.

Question 1.4:

If the recent land use is causing decomposition of the carbon stock, it should be allowed to use the carbon stock as raw material of bio fuel. This is the way to reduce the amount of total greenhouse gases, because the bio fuel made of carbon stock is compensating the fossil fuel otherwise used.

Question 1.5:

No.

Question 1.6:

Exceptional biodiversity: endangered or threatened species occur in the area.

Question 2.1 and 2:

There would be no changes in the land use, if the need of biofuels would not increase. The monitoring of the land use can be done according to the IPCC land use guidance.

Question 3.1:

Second generation biofuel can be defined according to the technology, which is using wide range of raw materials and refines products, which can be used in the recent engines.

Question 3:

Higher subsidies to second generation biofuels are OK, if the reduction in the amount of greenhouse gases is higher.

Question 4.1:

Yes, if the quality of the product is high enough for the recent engines and if the emissions from cars do not increase.

Questions 4.5 and 4.6:

Tax deduction is OK to the fuels, which have the highest reduction in emissions and which fit the recent systems.