

Q 1.1.

The Finnish Oil and Gas Federation considers it relevant to guide the use of biofuels to such fuels, that have the lowest life-cycle emissions of GHG's. Criteria for monitoring, verification etc. should be clear, concise and practical.

Q 1.2.

Overlapping and contradictory legal guidance should be avoided. Unfortunately there is an increasing amount of this kind of legislative proposals (e.g. Fuels Directive review, overall 10% biofuels target, ETS) all aiming at same issues, but in a different and incoherent way. This makes the administrative burden to stakeholders unreasonable.

Q 3.1.-3.3.

The definition of 2nd generation biofuels is difficult, because the technologies are at the stage of development, and the progress should not be enchained with premature and restrictive definitions. The biofuels should be assorted and categorised according to their life-cycle GHG performance irrespective of technology or raw material used (esterisation, etherisation, hydrotreatment, gasification or what ever process , or field crops, cellulosic, biowaste or what ever raw material).

Q. 4.1-4.3.

The development of biofuels market should be based on standardised fuels (EN 228 and EN 590). Separate grades should be avoided, but the standards should be improved to allow higher percentages of biofuel content. The present regulation to mark at the pumps grades that have more than 5% biofuel content may be relevant for the time being.

Q 4.6.

Different kinds of instruments may be considered to promote the use of biofuels (e.g. obligations combined with tax incentives). The present situation, where tax incentives in some Member States are only targeted to subsidise local farming may result into balkanisation of the fuel market in Europe, which is clearly against the common market principles.