

**Response of Finnish Biogas Association to
Public consultation exercise for the biofuel issues in the new legislation on
the promotion of renewable energy, carried out by Energy and Transport
Directorate-General, European Commission**

Question 1.1: Do you think the "possible way forward" described above is feasible?

Yes.

However, The JRC/EUCAR/CONCAWE well-to-wheel study is not adequate for policy purposes since it has neglected biogas and all the other putrescible waste based traffic biofuel production technologies, i.e. the technologies that have the largest environmental merit. It is necessary that the Commission requires them to be included in forthcoming JRC WTW work. Until those studies are adequately revised, the most policy relevant study is the LBS's "Well-to-Wheel Analysis of Energy Use and Greenhouse Gas Emissions of Advanced Fuel/Vehicle Systems - A European Study" made in 2002 and available at http://www.lbst.de/index_e.html?http://www.lbst.de/welcome_e.html

There is a more general tendency within the DGTREN to ignore biogas and other putrescible waste based traffic biofuel production technologies. For example, the Biofuels Progress Report COM(2006)845 mentions biogas only in one footnote. These technologies with the best climate and other environmental merit of all traffic biofuels could also have important contribution in the ongoing renewal of EU waste policy, the new strategy for sustainable use of natural resources, CAFE strategy and ETAP programme. Their use should be rewarded in the EU traffic biofuel policy against energy crop based traffic fuels, which at the moment seem to be the sole focus of the DGTREN traffic fuel policy. In conclusion, it seems that increased co-operation between DGTREN and DGENV is needed.

Question 1.4: Carbon stock differences between land uses would be taken into account under criterion 2. Should they also be taken into account under criterion 1? If so, what method should be used to determine how the land in question would have been used if it had not been used to produce raw material for biofuels?

We do not think it is necessary beyond what the good practice of WTW accounting does under criterion 1.

Question 3.1: How should second-generation biofuels be defined? Should the definition be based on:

- a) the type of raw materials from which biofuels are made (for example, "biofuel from cellulosic material")?
- b) the type of technology used to produce the biofuel (for example, "biofuels produced using a production technique that is capable of handling cellulosic material")?
- c) other criteria (please give details)?

“Second generation” traffic biofuels could be defined as traffic biofuels produced from

- a) putrescible biowaste, incl. human, animal and plant based waste, e.g. waste water, animal dung and carcasses, kitchen waste, landfill gas
- b) other waste or by-products from bioresource industry, e.g. straw, black liquor, logging residue
- c) energy crops that are completely utilized as traffic biofuels (but it is not to be required that all parts of the plant should be used in the same process)

There should not be any process based requirement for this definition.

Question 3.2: Please give your comments on the "possible way forward" described above. If you think the problem should be tackled in a different way, please say how.

The special support for 2nd generation fuels against the 1st gen. should not be time restricted, since they have higher environmental merits and, thus, deserve to be emphasized in promotion policies.

Question 4.2: Should the legislation include measures to encourage the use of ethanol and biodiesel in high blends? If so, what?

Yes.

In addition, ethanol and biodiesel blends in standard gasoline and diesel oil could be increased from the 10 % vol. level.

Question 4.3: Should the legislation include measures to encourage the use of biomethane, methanol and DME in transport? If so, what?

Yes.

EU should promote all traffic biofuels based on their environmental merits, not based on current production/use and current amount of suitable vehicles. Biogas should be promoted as the most environmentally benign traffic biofuel. Bio-methanol and Bio-DME, on the other hand, should be promoted since their production efficiency is the highest of all biofuels after gasification based biohydrogen.

Question 4.5: Should the legislation ask the Commission to review, by a given date, whether it is possible to be confident that the 10% target can be achieved through:

- a) rules that allow 10% blending by volume of ethanol in ordinary petrol, plus
- b) rules that allow 10% blending by volume of biodiesel in ordinary diesel, plus
- c) the four options listed under 'other options for solving the problem';

If so, what should the date be?

If the review were to conclude that the target is unlikely to be met, what action should the Commission take?

There are many more options for solving the problem and all should be supported. Especially, there should be more emphasis on pure or high blend use in captive fleets since they also have crucial contribution to cleaner urban air and fulfillment of the CAFE strategy.

The main reviews should be done in 2011 and 2015.

If the review shows that the EU as a whole is likely not meeting the target, both harmonized and country specific measures could be made. The harmonized measures should include minimum mandatory blending and compulsory removal of fuel taxes from pure and high blends. Countries that are far behind the average development in the EU should be helped by mandating country specific measures, such as higher blending than the minimum in harmonized rules.