

Norwegian Bioenergy Association'S REPLY TO PUBLIC CONSULTATION

EU Taxonomy Draft Delegated Regulation

Norwegian Bioenergy Association (Nobio) welcomes the opportunity to comment on the Draft Delegated Regulation Supplementing Regulation (EU) 2020/852.

Nobio is the interest organization for the Norwegian bioenergy industry. We work for sustainable increased use and profitable production of bioenergy in Norway. Our more than 100 members operate in the entire value chain from the forest with the production of biofuels, to the supply of heat and fuel.

In Norway bioenergy accounts for 7 percent of the final energy use. Just like in EU, bioenergy will be a major contributor to climate change mitigation in the coming decades. It is essential with deployment of bioenergy to reach the climate targets.

Bioenergy solutions give substantial contribution to climate change mitigation in accordance with Article 10.1 in Regulation EU 2020/852, points a), generating, distributing, and using renewable energy in line with the renewable energy directive EU 2018/2001, c) increasing clean and climate-neutral mobility, g) establishing energy infrastructure to enable decarbonization of energy systems, and h) producing clean and efficient fuels from renewable or carbon-neutral sources. The activities are intricately linked to d) switching to sustainably sourced renewable materials and will enable e) deployment of bio-CCS and bio-CCU in large-scale applications for negative emissions.

We strongly disagree with the categorization of bioenergy as a “transitional activity” in the taxonomy. Bioenergy is a renewable energy source on par with all the other renewable energy sources. To phase out fossil fuels, it is necessary to use bioenergy. Bioenergy can be stored and used both for solid, liquid and gaseous fuels to substitute fossil fuels and play a strategic role in a fully carbon-free and 100 percent renewable energy system. We need to use the right energy in the right place. Bioenergy is carbon-neutral and a part of the natural carbon cycle and as such qualifies as a “nature-based solution”.

The taxonomy has not captured the huge potential of the land-based sectors, agriculture, forestry and aquaculture, to contribute to climate mitigation. Europe has big untapped resources of underutilized and abandoned farmland and under-developed forestry. To make use of these resources in a sustainable way will reduce emissions from fossil fuels, improve energy security, and create jobs and economic development in rural areas and peripheral regions of EU and in neighboring countries.

The Taxonomy introduces new administrative burdens on farmers and forest owners which will lead to decreased supply of biomass for energy. By extending reporting on sustainability to heat plants under 20 MW, the taxonomy also increases the administrative burden on hundreds or even thousands of small energy plants around Europe using local biomass as energy source.



Nobio supports ambitious climate targets and a quick transition of the European energy system. The financial sector will play a central role in this change. Use of general incentives, primarily carbon pricing, to reach these targets and introducing carbon taxes in all member states and all sectors of the economy, combined with fair criteria for sustainability would be a good contribution and would lead to a free and open common market where different sustainable solutions can compete.

Best regards

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