These are the comments from Swedish Wood-fuel Association to the public consultation on the EU Taxonomy TEG report.

Our comments follow suggested answers in green text.

20. Metric for substantial contribution criteria:

We think a different metric should be used. We support your suggested rational for that (page 7).

21. Manufacture of Low carbon technologies  
  
We think different boundaries for applying principles should be used. We support your suggested rational for that (page 13).

21.9 Manufacture of plastics in primary form.

We think a different metric should be used. We support your green arguments for that (page 19).

22.8 Production of Electricity from Bioenergy

We think that boundaries for applying principles should be different. We support your suggestions in green.

We think different thresholds should be used as you suggest in green text.

The taxonomy should use the REDII sustainability criteria and nothing else.

We think  that the suggested DNSH ( Do No Significant Harm) criteria about Cascading use of biomass should be changed along the Commission report on best practice.  
When it comes to Ecosystems and Impact Assessments we note that bioenergy producers already have to show compliance with REDII sustainability criteria. There is no need for anything more.  
We agree to green text (page 24-26).

22.11 Manufacture of Biomass, Biogas or Biofuels.

We think boundaries should be adjusted so that wording in the title is conform to definitions in  REDII of “biomass fuels” and “biogas”.( Green text page 29).

Thresholds for substantial contribution criteria should be changed as argued in green text (page 30).

DNSH criteria should be changed as argued in green text (page31).

22.18 Cogeneration of Heat/cool and Power from Bioenergy.

Thresholds for substantial contribution criteria – 100 g CO2/kWh(e) for electricity and 30 g CO2e/kWh(th) for heat production for eligibility under taxonomy -  should be different as argued in green text (page  35).

22.22 Production of Heat/cool from Bioenergy.

Boundary of activity should be different along arguing about heat pump providing max 100  degrees C. while biomass heating can provide at least 500 degrees C. ( green text page 39).

Threshold for substantial contribution criteria should be checked. TEG need to provide scientific evidence for thresholds 30g CO2e/kWh(th) and 0g CO2e/kWh. REDII has other figures (green text page 39-40).

26.4  Individual renovation measures, installation of renewables on-site and professional, scientific and technical activities.

Thresholds for substantial contribution criteria should be different for  biomass stoves and boilers as argued in green text (page 44).

Swedish Wood-fuel Association /  Sven Hogfors  Secretary of the board