**Taxonomy 2020**

The Swedish Wood-Fuel Association is an organization for Swedish producers of solid wood fuels within the forest and recycling industry. We see that bioenergy is an essential key to leave the fossil dependence. Recent European Commission strategies underline that sustainable bioenergy is “a win-win solution for energy generation” ([COM(2020) 380 final,](https://eur-lex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF) EU Biodiversity Strategy 2030, p.10) and count on an increased mobilization of waste and residues for bioenergy generation to achieve a smart sector integration ([COM(2020) 299 final](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0299&from=EN), p.6). The achievement of the 2050 carbon neutrality goal will also depend on bioenergy generation. Sustainable bioenergy will still be the largest renewable in 2030 in the EU, standing at the forecasts included in the Integrated National Energy and Climate Plans.

The Swedish Wood-Fuel Association welcomes the ambitions in EU to reach for sustainability and climate neutrality. This proposal will however not lead EU in that direction. The delegated acts are not taking in consideration the possibilities of EUs growing forest and the potential in substituting fossil products and energy. Also, EU is heavily depending on import of natural gas, oil and coal. We think that is unacceptable that natural gas (a fossil fuel) get a free-ride in the short term. Bioenergy is one of the largest key players to get rid of fossil dependency, both in transport, heating/cooling and industry processes. Bioenergy is not a temporary solution. Renewables must work together in a modern and flexible energy system.

Forests are national competence within EU. The proposed requirements are not taking this in consideration. The requirements are very detailed, and we would like to point out that increased administrative requirements do not add any climate benefits per se. The Commission has not formulated the criteria in line with the revised Renewables Directive (RED II), as required by the legislators. We also think that it would have been more appropriate to use the definition of sustainable forestry as defined by Forest Europe. Forest Europe is the political high-level forum for dialogue and cooperation on forests in Europe (<https://foresteurope.org/>).

Under Afforestation (1.4 Annex II) we suggest removing reference to use of whole tree stems for bioenergy. “Whole trees” is an arbitrary categorization that can refer to high or low value trees in a variety of sizes. Arbitrarily excluding some low-value feedstocks have no practical implications on forestry practices as thinnings are mainly done in order to maximise the quality timber production. These small diameter "whole trees" can be considered as residues of timber production.

Deviations from the principle of technology neutrality have been made, e.g. in terms of renewable energy, forestry and buildings. Also, the taxonomy is disproportionally favoring electrification and hydrogen.

We see an urgent need that the Commission clearly states that research, development and innovations in the bioenergy sector contribute substantially to climate change mitigation. When excluding “transitional activities” and categorizing bioenergy solutions as transitional activities in other parts of the taxonomy, the conclusion is that the Commission does not see research, development and innovation in bioenergy as a sustainable activity. This is totally unacceptable and not in line with Horizon 2020 and Horizon Europe.

Last, we would like to point out that we have significant concerns about how the process for this delegated act has been carried out. The lack of sectoral involvement can be seen in the complex and non-relevant criteria.