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European Commission  
Directorate-General for Competition – Units B2, B3, H2  
Referring to your public hearing, number HT.5371

## **Public consultation on the revised Climate, Energy and Environmental Aid Guidelines (CEEAG)**

Suomen luonnonsuojeluliitto (The Finnish Association for Nature Conservation) is the oldest and biggest environmental non-governmental organisation in Finland. We welcome the revision of the CEEAG. We would like to highlight how important it is to exclude hydropower and new peat products from CEEAG and other public funding because of the *Do No Significant Harm* principle.

### *Hydropower – it is time for restoration of rivers, not new hydropower dams*

Many rivers have been blocked by dams. For example, in Finland we have 79 hydropower plants over 5 MW, 166 under 5 MW and 452 under 1 MW (Rinnevali, R. et al 2021. Vaellusesteiden purkamisen osana vaelluskalojen elinympäristökunnostuksia. Luonnonvara- ja biotalouden tutkimus 29/2021. Luonnonvarakeskus. Helsinki. 88 p. <https://jukuri.luke.fi/handle/10024/547478>). These dams are bad for migratory fish and freshwater habitats. That is why we are removing them, restoring ecological flow and ways for migratory fish (e.g. Finnish National Fishway Strategy, Finnish national NOUSU programme etc.). In the new Biodiversity Strategy the EU has a target to restore 25 000 km rivers until 2030. This restoration work is expensive, so the best option is not to make any new hydropower dams in the EU.

### *Peatlands – all peat extraction is harmful for nature and climate*

It is good to replace peat burning with renewable energy sources. In Finnish discussions about the *Just Transition Fund* some actors have now wanted EU money for *other* peat products, for example growing media for gardens, animal bedding in farms, biostimulants and active charcoal. However, all peat extraction destroys peatland ecosystems and habitats. It causes leaching of nutrients and dissolved organic matter and carbon to water. In addition, it causes carbon dioxide emissions from the drained soils. All peat products should be replaced with more sustainable alternatives. That is why it is essential to exclude all peat and moss products from public funding. It is now better to invest in peat-free products, restoration of peatlands and paludiculture.

### Further information

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