

Ahead of trilogue negotiations on the Renewable Energy Directive for 2020-2030, ePURE – representing European producers of renewable ethanol from conventional and advanced feedstock – calls on negotiators to create an ambitious framework for increasing the share of renewable energy in transport, consisting of:

- a firm min. 12% RES-T target, without multipliers, to which crop-based biofuels can contribute;
- a stable 7% crop cap – any reduction should not penalize biofuels with high GHG savings;
- a binding sub-target for Annex IX-A advanced biofuels– as per the Commission proposal.

1. Set meaningful ambitions for renewable low-carbon fuels

- Meeting the EU’s 2030 climate and energy goals requires between 12% and 15.6% renewable energy content in transport, without artificially inflating this share with multipliers ([SWD\(2014\) 15 final](#), p. 139).
- With an increased overall renewables ambition, the transport sector needs to foster the uptake of renewable low-carbon fuels. The EU therefore needs a firm 2030 RES-T obligation of at least 12% in each Member State, one that:
 - follows a trajectory starting no lower than the 2020 baseline;
 - cannot be reduced if a Member State decides to lower the contribution of crop-based biofuels;
 - does not include multipliers, which have proven ineffective to encourage the deployment of innovative technologies, provide no climate benefits and only increase the share of fossil energy;
 - allows all sustainable biofuels, including crop-based ones, to contribute without the need for an intermediate ‘low-emissions fuels obligation’ that reduces the flexibility of Member States.

2. Ensure a stable policy framework for existing and future investments

- Any reduction of the crop-based biofuels cap below 7% would only penalize those Member States which properly implemented existing legislation and are on track to meet their 2020 obligations. Amending the 2015 compromise would deter investors in advanced and other renewable fuels.
- European renewable ethanol already delivers 66% GHG savings on average, without creating any negative externalities. Any lowering of the cap should not apply to those biofuels that deliver high GHG savings with the current methodology (incl. carbon capture and replacement).

3. Promote advanced biofuels in synergy with crop-based biofuels

- Dedicated support and stable policies are needed to restore investor confidence and enable investments in commercial production of advanced biofuels made from existing Annex IX-A feedstock.
- Provided a firm and ambitious RES-T target is set, to which crop-based biofuels can contribute, ePURE supports the initial Commission proposal for an ambitious and binding sub-target for advanced biofuels made from existing Annex IX-A feedstock, starting from 2021 up to 2030.

4. Strengthen sustainability criteria

- A maximum contribution of biofuels from Annex IX-B must be maintained and their contribution should not count double. The proposed limit represents the domestic potential of these feedstock. Removing it would further increase imports of biofuels made from raw materials that may be incorrectly declared as wastes and residues and further reduce the share of domestic sustainable biofuels.
- The contribution of transport fuels from palm oil and its derivatives to the RES-T target should be limited until global peatland conversion is halted. By limiting their sole contribution to the RES-T target as opposed to limiting their uptake in the energy mix, such a restriction would not represent an import ban, but a legitimate response to protect the environment in line with WTO rules.