



Re.: Trilogue negotiations on the recast of the EU Directive on the Promotion of Renewable Energy Sources

Dear Sir or Madam,

Ahead of the RED II trilogue negotiations which will take place on May 17th, we would like to recommend a stable, long-term policy guaranteeing existing and future investments in the biofuel sector as well as greater consistency between the different EU policy areas. This will ensure that the strategy's ambitious climate and energy objectives can be put into actual practice in the period after 2020.

To this end, and to ensure an ambitious share of renewables in transport, we endorse an ambitious 35% target for renewables coupled with a minimum transport incorporation obligation of 14% for all renewable sources, without technological restrictions. This level should build on the existing 10% target for 2020 and follow an increasing linear trajectory until 2030, without being artificially boosted by multipliers for renewable electricity.

Indeed, multipliers would inevitably result in an exemption, equivalent to these multipliers, for fuel suppliers from their obligation to replace fossil fuels with renewable fuels. As a result, the share of fossil fuels in transport equivalent to these multipliers would in practice be excluded from the objectives to promote renewable energy sources and to reduce greenhouse gases. This would mean that, post 2020, non-ETS sectors would need to reduce their greenhouse gas emissions further. The significant lack of greenhouse gas emission reductions in the transport sector would have to be compensated for by the other non-ETS sectors. Consequently, agriculture and households in particular would have to bear the additional costs of low-energy building refurbishment.

Moreover, it is crucial to preserve the contribution made by EU crop-based biofuels to ensure regulatory certainty and a long-term framework. Therefore, to achieve real and effective decarbonisation targets, ensure policy consistency and respect existing industry investments, the 7% maximum contribution to the transport target set for crop-based biofuels should not be lowered. This 7% cap is the result of a compromise between the EU institutions following three years of intense policy debates on the ILUC Directive in 2015, which allows the existing crop-based biofuel industry to effectively contribute to the decarbonisation of the transport sector.

However, the share of palm oil and its derivatives incorporated into diesel and petrol has increased significantly over the last few years to the detriment of European feedstocks that contribute to providing animal feed and high value protein for livestock (of which the EU is in short supply) and to jobs and growth in EU rural areas.

Therefore, we would like to recommend that the following measures be taken into account in the RED II trilogue negotiations:

- an ambitious EU target for renewable energy sources of 35% coupled with an incorporation obligation for renewable energy sources in transport without technological restrictions of at least 14%, to which crop-based biofuels contribute up to 7%.
- the removal of multipliers for renewable electricity leading to virtual incorporation of renewable energy sources, which benefits fossil fuels.

- effective corrective measures with regard to the contribution of palm oil and its derivatives to EU climate and environmental objectives insofar as sustainability problems, such as deforestation and peatland conversion in the country of origin, remain unresolved.
- rejection of any consideration of estimated values for emissions linked to indirect land use change. Indeed, ILUC sanctions EU farmers for land conversion in third countries over which they have no influence.
- Finally, we call for cascading use of biomass. However, generally speaking this should not be prescribed by law because this would hinder the expansion of optimised and combined value chains for material and energy from the outset.

We hope that you will take into consideration the content of this letter.

Yours faithfully,



Elisabeth Lacoste
Director General
C.I.B.E.



Philippe Dusser
Secretary General
European Oilseed Alliance



Emanuel Desplechin
Secretary General
ePURE - European renewable ethanol



Céline Duroc
CEPM Permanent Delegation



Pekka Pesonen
Secretary General
Copa-Cogeca

CEPM brings together Professional and inter-Professional organisations whose mission is to represent and defend in their respective countries the interests of all or part of the maize chain: corn, maize silage, maize seed and sweet corn. To fulfil these objectives, CEPM carries out monitoring, lobbying and communication activities, and makes concrete proposals.

The **C.I.B.E.** is the international confederation of sugar beet growers. It represents the interests of beet growers vis-à-vis European Institutions and international organisations since 1927. CIBE is composed of national and regional associations from 18 European beet-producing countries. These include 140,000 growers from 16 EU countries (Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, the Netherlands, Poland, Romania, the Slovak Republic, Sweden, the United Kingdom) and roughly 130,000 growers from 2 non-EU countries (Turkey and Switzerland).

Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 23 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states. Together, they are one of the biggest and most active lobbying organisations in Brussels.

Founded in 2002, the **European Oilseed Alliance (EOA)** brings together the oilseed producing organizations from the main European countries (Germany, France, UK, Poland, Czech Republic, Finland and Belgium) and represents 90% of European oilseed production.

The **European renewable ethanol association (ePURE)** represents the interests of European renewable ethanol producers to the European institutions, industry stakeholders, the media, academia and the general public. The organisation, established in 2010, promotes the beneficial uses of ethanol throughout Europe. Based in Brussels, ePURE represents 42 member companies, with 50 production plants in 16 member states, accounting for about 85% of the installed renewable ethanol capacity in Europe.