

## Position on RED II revision – public consultation

In addition to the response to the public consultation questionnaire on the RED II revision, ePURE would like to provide recommendations to make the most out of this upcoming revision of the main policy instrument fostering the uptake of renewable energy in transport. This in order to significantly increase renewable energy quantity in Europe, reduce reliance on fossil energy and support the European Green Deal ambitions.

As the EU is once again moving towards a new revision of the RED, **it is critical that the Commission takes stock of the shortcomings of the approach that has been taken so far on renewables in transport and crop-based biofuels in particular.** The design of RED II puts renewables against each other, instead of trying to replace fossil fuels as much as possible. This approach, initiated by the ILUC Directive, hinders greater renewable energy incorporation.

- It is time to do better: **the EU cannot afford to dismiss what has been the nearly sole contributor to renewable energy incorporation in transport and the third largest renewable energy job creator in the EU.** In light of the Green Deal ambitions, it would be wise to revise upwards the current cap on crop-based biofuels put in place in response to ILUC concerns which have now been fully addressed in the Delegated Act on high ILUC-risk biofuels. The existence of a crop-based biofuel cap simply hinders greater renewable energy incorporation in transport by penalising some high environmentally performing biofuels such as European renewable ethanol.
- **RED II targets and sub-targets should only be revised upwards**, without the possibility to reduce them, as it is presently the case through reduced crop-based biofuels cap and the use of artificial multipliers. The target of at least 14% is not sufficient to achieve the ambitions set out in the European Green Deal and the 2030 Climate target plan.

As illustrated by the launch of this process at a time where Member States are still implementing RED II and confirmed by the 2020 Renewable Energy Progress Report, **the EU renewable energy policy framework has been highly unstable and inconsistent**, hindering investors certainty and delaying the necessary deployment of renewable energy in transport.

**Low carbon renewable fuels such as ethanol consistently deliver high GHG emissions savings and offset fossil fuels reliance. Keeping fossil fuels in the ground is essential to meet the climate targets for 2030 and to become climate neutral in 2050. Renewable ethanol produced by ePURE members saves more than 72% GHG emissions compared to fossil fuel on average; these savings have increased by more than 20% over the last 9 years. More than 99% of the feedstock used by ePURE members to produce renewable ethanol originated in Europe which contributes to sustain farmers revenue, hence preserving Europe's food security.**

**ePURE members are at the forefront of EU transport decarbonisation, investing to valorise European crops, waste and residues in the production of crop-based and advanced ethanol and further increase GHG emissions savings: in addition to ethanol, ePURE members are co-producing protein animal feed and capturing biogenic CO<sub>2</sub> for further uses.**

In light of the above, ePURE calls on the Commission to consider the following key policy recommendations:



## 1. An ambitious and stable policy framework

- RED II targets for transport represent a bare minimum to achieve the decarbonisation objectives considering the weight of the sector in the Effort Sharing. Failure to further decarbonise transport would not only jeopardize our climate goals but place a higher burden on other non-ETS sectors such as agriculture.
- Policy continuity requires long-term visibility, beyond 2030, but also ensuring that both the 2020 and recently agreed 2030 targets are met, including the dedicated sub-target for advanced biofuels. To provide investor certainty, the Commission ought to secure that this sub-target is not undermined by any future revision. Development of new and revised policies should not come at the expense of the implementation of agreed legislation.

## 2. Increase ambitions for renewable energy in transport

- Renewable fuels help limiting the use of climate-damaging and air polluting fossil fuels. Each Member State should endeavour to gradually increase its share of renewable energy in transport to a minimum of 24% by 2030. Ideally, they ought to put in place obligations for renewables uptake in all transport fuels, e.g. separate targets in petrol and diesel.
- The obligation to decrease the carbon intensity of transport fuels set by Art. 7a of the Fuel Quality Directive must continue and be progressively increased to at least 16% by 2030.
- Multiple counting of several renewable energy sources is counterproductive to climate change mitigation and perpetuates fossil fuel dependence. It should be eliminated and reporting of progress towards renewable energy targets should be based on real uptake and not be artificially inflated.

## 3. Promote sustainable crop-based biofuels

- Crop-based biofuels are an immediate and cost-effective tool to reduce emissions of the existing and future light and heavy-duty vehicles, considering their number and lifespan. Their use should not be limited to transport modes that cannot be electrified.
- The crop cap set by the ILUC Directive and amended under RED II should be revised upwards, to provide each Member State with flexibility, taking into consideration the current crop-based biofuels market uptake, higher renewables and emissions reduction targets, and that the delegated act on high-ILUC risk biofuels has been adopted since then. European crops do not drive deforestation and commodities prices up, and only high-ILUC-risk biofuels must be limited and then progressively phased out.
- The year 2020 as reference for the crop-based biofuels cap should be reviewed in light of COVID-19 market impacts.

## 4. Continue the progressive deployment of advanced biofuels

- The deployment of advanced biofuels from RED II Annex IX-A feedstock should build on existing legislation and industry, to secure investor confidence, which is a prerequisite for any new investment into renewable fuels.
- Advanced biofuels must be established as an additional instrument to further reduce fossil fuel use and GHG emissions and remain supported through a dedicated ramping-up sub-target leading to min. 3.5% by 2030 based on the current Annex IX-A feedstock list, without multipliers but associated penalties for non-compliance.

## 5. Strengthen sustainability criteria

- All sustainable renewable low carbon fuels should be able to contribute towards EU's climate and renewable objectives under stricter sustainability criteria, including European environmental standards for agricultural production, GMO policy, waste prevention and managements standards, and strict traceability requirements.
- Consistent with its climate agenda and the sustainable provisions on forest biomass (Art. 29.7 a. 1), the EU must require that all renewable feedstock eligible to count towards the targets originates in countries that are parties to the Paris agreement.

# Consultation on the Review of Directive 2018/2001/EU on the promotion of the use of energy from renewable sources

Fields marked with \* are mandatory.

## Introduction

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This consultation aims to collect views and suggestions from stakeholders and citizens in view of the possible proposal for a revision of Directive 2018/2001/EU on the promotion of the use of renewable energy (RED II), planned for 2021.

Renewable energy is produced using the earth's natural resources, like sunlight, wind, water resources (rivers, tides and waves), heat from the earth's surface, or biomass. Using renewable energy, instead of fossil fuels, substantially reduces the emission of greenhouse gases, which is why renewable energy is also referred to as 'clean energy'.

Today, the energy sector is responsible for more than 75% of the EU GHG emissions, so increased uptake of renewable energy alongside energy efficiency has a key role to play in reducing GHG emissions in a cost-effective way. More energy from renewable sources also enhances energy security, creates growth and jobs, reduces air pollution when not based in combustion and strengthens the EU's industrial and technological leadership.

The review of RED II is carried out in the context of the European Green Deal[1] in which the Commission committed itself to review and propose to revise, where necessary, "the relevant energy legislation by 2021.

In the European Green Deal the Commission proposed to increase the Union's 2030 greenhouse gas (GHG) reduction target from 40% to at least 50% to 55%, with the objective of climate-neutrality by 2050.

On 17 September 2020, the Commission published its 2030 Climate Target Plan, which presents a new 2030 target of at least 55% net GHG emission reductions compared with 1990 levels on basis of a comprehensive impact assessment. Achieving at least 55% net GHG emissions reductions would require an accelerated clean energy transition with renewable energy seeing its share reaching 38% to 40% of gross final energy consumption by 2030.

This range of 38% to 40% is higher than the binding Union level target for 2030 of at least 32% of energy from renewable energy sources introduced by RED II. It is also higher than the share of renewables, between 33.1% and 33.7%, that would be achieved if Member States complied with the national contributions set in their integrated National Energy and Climate Plans (NECPs) for 2030.

In addition, the Commission has adopted, or will adopt, other strategies containing a number of key actions supporting the increased climate ambition, which could be followed through in the review of REDII. This is the case, for instance, of the Energy System Integration[2] and the Hydrogen Strategies[3], adopted on 8 July 2020, the Renovation Wave Strategy[4], adopted on 14 October 2020, and the Offshore Renewable Energy Strategy, planned for 19 November. In addition, the European Green Deal includes a "Green Oath

to do no harm”, in particular by preserving biodiversity and reducing air pollution. To this end, the Commission adopted on 20 May 2020 an EU Biodiversity Strategy for 2030, which also contains commitments of relevance for the REDII review.

The answers to this questionnaire will feed into the review process of RED II, and more in particular into the impact assessment that the Commission will carry out to assess whether a revision is needed and what revision would be the most appropriate. No evaluation of RED II will be done, since this Directive, adopted in December 2018, has not yet been transposed and implemented by Member States (its transposition deadline is on 30 June 2021), and a full-fledged evaluation of Directive 2009/28/EC (RED I) was done in 2016 when preparing the proposal for RED II.

The questions are formulated to respect the requirements of the Better Regulation rules[5]. The questions are divided into different sections: questions about the identity of respondents, general questions on revising RED II, questions on transversal elements derived from the Energy System Integration and Hydrogen Strategies, and technical questions on specific aspects of RED II, including questions on buildings and offshore renewables, in line with the Renovation Wave and the Offshore Renewable Energy Strategy. If you don't have an opinion on a question, do not reply.

[1] COM(2019) 640 final

[2] [https://ec.europa.eu/energy/sites/ener/files/energy\\_system\\_integration\\_strategy\\_.pdf](https://ec.europa.eu/energy/sites/ener/files/energy_system_integration_strategy_.pdf)

[3] [https://ec.europa.eu/energy/sites/ener/files/hydrogen\\_strategy.pdf](https://ec.europa.eu/energy/sites/ener/files/hydrogen_strategy.pdf)

[4] [https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave\\_en#documents](https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave_en#documents)

[5] [https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how\\_en](https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en)

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**Please note that this questionnaire will be available in all EU-languages as from 09/12/2020.**

## About you

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- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Emmanuel

\* Surname

DESPLECHIN

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desplechin@epure.org

## \* Organisation name

255 character(s) maximum

ePURE - European renewable ethanol

## \* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

## Transparency register number

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## \* Country of origin

Please add your country of origin, or that of your organisation.

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## 1. General questions on the review and possible revision of the Renewable Energy Directive

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REDII provides a general framework for the promotion of energy from renewable within the Union in order to ensure the achievement of the binding EU renewable energy target of at least 32% by 2030. It sets out rules on support schemes for renewable energy, on guarantees of origin for energy from renewable sources, on administrative procedures, on the integration of renewable sources in buildings, on selfconsumption and renewable energy communities, and on renewable energy in heating and cooling and in transport. It also sets out sustainability and GHG emissions criteria for bioenergy.

On 17 September 2020, the Commission published its 2030 Climate Target Plan, where it presents an at least 55% net target for GHG emissions reduction in 2030. As result of this increased ambition, the plan indicates that renewables should represent from 38% to 40% of the gross final energy consumption in 2030.

### 1.1 How important do you think renewable energy will be in delivering the EU's higher climate ambition for 2030 and carbon neutrality by 2050?

- Very important
- Important
- Not very important
- Not important

### 1.2 Do you think REDII needs to be modified? (multiple answers possible)

- Yes, it needs to be more ambitious as result of the higher climate ambition in the European Green Deal and Climate Target Plan
- Yes, it needs to be more prescriptive to ensure that the EU renewable energy objectives are reached
- Yes, it needs to be less prescriptive, giving Member States more freedom on how to achieve their renewable energy objectives

- Yes, but only those adjustments required to reflect the European Green Deal objectives
- No, it strikes the right balance as it is
- No, even if there could be areas of improvement, legislation should not be modified so shortly after its adoption
- Other

**1.3 If you answered 'yes' to the previous question, which parts of RED II do you think should be amended? (multiple answers possible)**

- Overall Union target of at least 32% for renewable energy for 2030
- Target of at least 14% for renewable energy in transport by 2030.
- Indicative target of an annual increase of 1.3% point for renewable energy used in heating and cooling
- Indicative target of an annual increase of 1% point for renewable energy used in district heating and cooling and provisions on access to district heating networks
- Provisions on how to design support schemes for electricity from renewable sources
- Provisions on cooperation mechanisms between Member States
- Provisions on how to promote renewable energy in buildings
- Provisions simplifying administrative procedures for renewables project developers
- Requirements on guarantees of origin for energy from renewable sources
- Provisions on self-consumption and renewable energy communities
- Sustainability and GHG emission saving criteria for energy produced from biomass
- Provisions on sustainable low carbon fuels such as low-carbon hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production
- Other

Please explain your answer

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Re. overall and RES-T target:

The Impact Assessment underpinning the Climate Target Plan highlights the fundamental role by renewable energy in delivering the EU's higher ambition for 2030 and climate neutrality by 2050. This is particularly relevant in the transport sector:

- whose emissions have increased by 20% compared to 1990 levels and account for over a quarter of the bloc's emissions; and
- which is 94.8% dependent on fossil fuel and this dependence has barely decreased since RED I was approved in 2009.

Current RED II targets, including the sectorial one for transport are insufficient to meet the higher ambitions of reducing the sector's emissions by 90% to put the EU on the path to climate neutrality.

Aligning the RED II with the upgraded climate ambitions requires:

1. Long-term visibility, beyond 2030, but also ensuring that both the 2020 and recently agreed 2030 targets are met, including the dedicated sub-target for advanced biofuels. To provide investor certainty, the European Commission ought to secure that this sub-target is not undermined by any future revision. Development of new and revised policies should not come at the expense of the implementation of agreed legislation.
2. Progressively increasing each Member States' RES-T target. Ideally, Member States ought to put in place obligations for renewables uptake in all transport fuels, e.g. separate targets in petrol and diesel.
3. Revising the cap on crop-based biofuels upwards to unleash their contribution to emissions reduction. Indeed, the current cap was set prior to science having concluded that European crop-based ethanol is no driver to deforestation and is therefore not a feedstock of high ILUC-risk.
4. Removing the multiple counting of several renewable energy sources that is counterproductive to climate change mitigation and perpetuates fossil fuel dependence.

Re. Sustainability and GHG emission saving criteria:

1. All sustainable low carbon fuels should be able to contribute towards EU's climate and renewable objectives under stricter sustainability criteria, including European environmental standards for agricultural production, GMO policy, waste prevention and managements standards, and strict traceability requirements.
2. Consistent with its climate agenda and the sustainable provisions on forest biomass (Art. 29.7 a. 1), the EU must require that all renewable feedstock eligible to count towards the targets originates in countries that are parties to the Paris Agreement.

#### **1.4 In which sectors do you think additional efforts to increase the use of renewable energy are most needed for a potentially higher renewables target for 2030? (multiple answers possible)**

- Electricity
- Gas
- Heating and cooling
- District heating and cooling
- Buildings

- Services (including ICT)
- Industry
- Transport
- Agriculture
- Other

**1.5 Do you see scope for simplifying RED II or reducing regulatory burdens, including administrative burdens?**

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**1.6 Do you think the level of the 2030 Union target for renewable energy should be raised within the range indicated in the 2030 Climate Target Plan (38 - 40%)?**

- Yes
- No, it should be higher than 40%
- Other

**1.7 Should the overall renewable target be binding at EU level or at national level?**

- At both levels
- Only at EU level
- Only at national level
- At neither of the levels

## **2. Technical questions on Transversal Energy System Integration Enablers**

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In order to achieve climate neutrality cost-effectively the energy system needs to operate in a more integrated manner, across multiple energy carriers, infrastructures and consumption sectors. The Energy System Integration and Hydrogen Strategies published by the Commission in July set the vision to build an integrated energy system fit for climate-neutrality and turn hydrogen into a viable solution. This vision is established around three main pillars: 1) a more circular energy system, with 'energy-efficiency-first' at its core; 2) accelerating the electrification of energy demand, building on a largely renewables-based energy system; 3) promote renewable and low-carbon fuels, including hydrogen, for hard-to-decarbonise sectors.

## 2.1 How important do you consider the following measures to build a more integrated energy system?

	Very important	Important	Not very important	Not important
Apply the Energy-Efficiency-First principle across the whole energy system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the mobilisation of waste heat, for instance from industry or data centres	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the deployment of smart district heating and cooling networks that use renewable energy and thermal storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable energy in buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable electricity in industry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable electricity in the transport sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the production of renewable liquid fuels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the production of sustainable biogas and biomethane	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the production and use of renewable hydrogen	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the digitalisation of the energy system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas related to the use of renewables that could contribute to building a more integrated energy system? Please specify.

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Innovative ethanol biorefineries are already based on the concept of circularity: they process and valorise biomass from crops, wastes and residues to transform these into several co-products. As an example, while 22% of the EU protein demand is met by imports, in particular soy from the Americas, ePURE members' biorefineries produced 3.8 million tonnes of high-protein, GMO-free animal feed, contributing to EU's protein supply.

They also capture CO<sub>2</sub> for use in e.g. beverage and food applications. In this way, European ethanol already creates synergies between transport, agri-food and waste sectors.

The Energy System Integration Strategy recommends to advance towards a more circular energy system, with 'energy-efficiency-first' at its core.

## 2.2 How do you think the energy efficiency first principle should be reflected in the Renewable Energy Directive?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Promote the use of renewables in low-temperature efficient heating systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the production of heat directly from renewable energy or waste heat with minimal energy transformation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the installation of thermal energy storage together with the renewable heat generator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote self-consumption of renewable thermal heat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the reuse of waste heat from industrial sites, data centres, or other sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the use of renewable electricity in end-uses across all sectors where this is cost-efficient	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prioritise the efficient use of renewable electricity by taking into account conversion efficiencies of renewable electricity in different end uses (eg. heat pumps have better efficiency than using hydrogen for space heating)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide information to consumers about the energy content of the energy they are purchasing, across carriers and sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prioritise the use of available renewable energy carriers in those end use sectors where they have the greatest decarbonisation impact for each unit of energy consumed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

## 2.3 How appropriate do you think the following measures would be in supporting the electrification of energy consumption?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Sectorial targets for electrification of end-use sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for electrification of buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for electrification of transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for electrification of industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for consumer empowerment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Guidance to Member States to address the high charges and levies borne by electricity and ensure the consistency of non-energy price components across energy carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Align taxation of energy products and electricity with EU Climate and Energy Policy goals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further measures to foster digitalisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further development of interconnections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further development of transmission and distribution networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Other? Please specify

*3000 character(s) maximum*

While supportive of the transition to a fully sustainable electrified mobility in which environmental impact is measured on the full life cycle basis, including the production and recycling of batteries, it would be inappropriate to reserve biofuels to the sole transport segments that cannot be electrified (aviation and maritime) because :

- Conventionally- fueled cars continue to be the dominant means of transport in cities. In 2018, according to ACEA, petrol and diesel passenger cars accounted for 95.9% of the total passenger cars fleet, and Europeans keep buying them: in 2019, 89.4% of the new registered cars were conventionally-fueled. These figures were confirmed by the last Impact Assessment underpinning the 2030 Climate target plan, which predicted that between 74 and 77% of the EU car stock will be conventionally-fueled (41% petrol, 33-36% diesel) by 2030.

- Considering that many of the alternative fuel vehicles currently on the market (LPG/LNG/CNG/PHEVs) -



conceived to replace conventional ones - are still reliant on fossil fuels, or electricity that is only 32% renewable at EU level, ethanol has a role to play in the existing vehicles and in those which will remain on the roads for the decade to come.

- Carbon abatement cost should be a metric to ensure the transport decarbonisation is socially fair. Renewable ethanol is the cheapest alternative renewable fuel per tonne of CO<sub>2</sub> avoided. EU renewable ethanol fuel produced by ePURE members already achieves significant GHG emissions reduction, more than 72% on average compared to fossil fuel.

Going beyond and building on the existing certification and traceability framework, the Energy System Integration Strategy and the Hydrogen Strategy state that the Commission will consider additional measures to support renewable and low-carbon fuels, possibly through minimum shares or quotas in specific end-use sectors (including aviation and maritime), through the revision of REDII and building on its sectoral targets. Renewable fuels cover sustainable biofuels, bioliquids and biomass fuels, as well as renewable hydrogen and renewable synthetic fuels. Low carbon fuels cover hydrogen and synthetic fuels produced through a variety of processes, but with significantly reduced full life-cycle greenhouse gas emissions compared to existing production. According to the Strategies, the support regime for hydrogen will be more targeted, allowing shares or quota only for renewable hydrogen. They also state that the Commission will propose a comprehensive terminology for all renewable and low-carbon fuels and a European system of certification of such fuels, based notably on full life cycle greenhouse gas emission savings and sustainability criteria, building on existing provisions including in the Renewable Energy Directive.

**2.4 How do you consider that “low carbon” fuels that are not renewable but provide significant GHG emissions reduction compared to fossil fuels, such as non renewable hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production, should be treated?**

- They should be promoted equally to renewable fuels and thus be mandatorily integrated in any end-use target or quota
- They should be promoted but less than renewable fuels
- Member States should have the freedom to decide whether to promote them alongside renewable fuels in any end-use target or quota
- They should not be promoted

**2.5 Do you think the use of hydrogen and e-fuels produced from hydrogen should be encouraged (multiple answers possible)?**

- Yes, regardless of the source used to produce them
- Yes, but only if produced from renewable energy

- Yes, but under a certain level of conversion losses
- Yes, but only if produced and used in a way that leads to no or low GHG emissions along their life cycle, compared to the fossil fuel they are replacing
- Yes, but only when its whole value chain is more energy efficient in comparison to alternative energy sources and carriers
- Yes, but only for limited uses where no other alternatives are feasible
- No
- Other

Please specify

*3000 character(s) maximum*

Supporting the use of green hydrogen in the production of fossil fuels is counterproductive and should not be promoted. The general goal of the renewable energy directive is the replacement of fossil fuels.

## 2.6 How effective do you think the following measures would be in supporting the uptake of RES and low-carbon fuels?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Minimum shares or quotas of renewable and low carbon fuels, including renewable hydrogen, in specific end-use sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carbon Contracts for difference[1]	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Supply-side quotas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Market based support schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply-side GHG-based targets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] Carbon contracts for difference are long term contract with a public counterpart that would remunerate the investor by paying the difference between the CO2 strike price and the actual CO2 price in the ETS in an explicit way, bridging the cost gap compared to conventional fossil-based production.

Other? Please specify

*3000 character(s) maximum*

The Carbon Contracts for difference are not appropriate because the CO2 price in the ETS is not a proper benchmark for CO2 abatement costs in transport.

GHG reduction target for fuels is instead an efficient way to support the uptake of renewable and low-carbon fuels. The obligation to decrease the carbon intensity of transport fuels set by Art. 7a of the Fuel Quality Directive should be progressively increased.

## 2.7 How important do you think the following principles are for a robust and comprehensive certification and verification system covering all renewable and low carbon fuels? (Multiple answers possible)

	Very important	Important	Not very important	Not important
The certification and verification system should cover all end-use sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should cover all renewable and low carbon fuels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should demonstrate that renewable hydrogen and renewable synthetic fuels are produced from additional renewable electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should follow as closely as possible the real energy flows and ensure that consumption of renewable and low carbon fuels takes place in certain target sectors (e. g. transport) in the Union, for instance by using a mass balance system.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system does not need to follow the real energy flows as it is sufficient to incentivise the promotion of renewable and low carbon fuels independently of where they are consumed in the Union, for instance by using a book-and-claim approach such as for Guarantees of Origin.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should follow as closely as possible the real energy flows only for liquid renewable and low carbon fuels, but allowing a book-and-claim approach such as for Guarantees of Origin is more appropriate for gaseous renewable and low carbon fuels injected into the natural gas grid	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should ensure that the GHG impact of energy conversions along the value chain (e.g. renewable electricity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

used to produce renewable hydrogen) are fully taken into consideration, while avoiding double counting				
Where CO2 is used in the production of a fuel, the certification system should distinguish between fuels using CO2 of fossil origin and CO2 of non-fossil origin	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other principles? Please explain

*3000 character(s) maximum*

**2.8 In the current system, only electricity suppliers are required to certify to consumers the share of energy from renewable sources by guarantees of origin. Do you think that this obligation shall be extended to suppliers of renewable fuels (such as biogas, biomethane or renewable hydrogen) as well, and possibly of “low carbon” fuels?**

- Yes, for renewable fuels
- Yes, for renewable fuels and low carbon fuels
- No

**2.9 Do you think the cooperation mechanisms set out in RED II should be extended to cover renewable hydrogen regardless of its end use, so that Member States can support renewable hydrogen projects in other Member States and in third countries while counting the energy produced as their own?**

- Yes
- No

Please explain your reply

*3000 character(s) maximum*

Setting higher renewable shares targets is one instrument to meet GHG saving target of 55% in 2030 to which each Member State should contribute. Cooperation mechanisms are reasonable only above the minimum targets defined in RED II.

The EU's 2050 decarbonisation scenarios and other international reports suggest that renewables, energy efficiency and electrification will have to deliver most of the required emission reductions. However, carbon capture technologies will potentially be needed to create the negative emissions required to reach climate neutrality and address emissions from hard-to-abate sectors.

## 2.10 Carbon-capture and storage/usage in the EU should play a prominent role in...

	Strongly agree	Agree	Disagree	Strongly disagree
Decarbonising the power sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Decarbonising energy intensive industries (e.g. chemicals, cement, steel)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of hydrogen (i.e. based on natural gas with CCS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating negative emission / carbon removal, e.g. via CCS applied to bioenergy[1] (BECCS) or direct air capture and storage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing captured CO2 as a feedstock for other industries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 2.11 In addition to how CCS and CCU are treated in other EU legislation, do you think REDII should be revised to encourage the uptake of CCS and CCU?

- Yes
- No

Please specify

*3000 character(s) maximum*

Carbon capture and storage/usage is one of the positive sides of bioenergy production, so is carbon capture and reutilization (CCR), here omitted.

Ethanol biorefineries have the potential to be a carbon sink: the fermentation step allows to capture in a cost-efficient manner a high purity stream of CO<sub>2</sub> of biological origin. This is already reality for many of the ePURE members: in 2019, ePURE members captured and valorised 0.8 million tonnes of CO<sub>2</sub>.

The deployment of carbon capture technologies at renewable ethanol plants has significant mitigation potential. It further improves the emission savings of renewable ethanol and could in parallel offer a reliable, sustainable and scalable source of bio-based CO<sub>2</sub> which can be re-used in food, material and fuels applications.

### 3. Technical questions on specific sectors

This section covers specific sectors covered by REDII and asks for your opinion on whether they should be changed/strengthened in order to improve the chances of achieving the EU's 2030 climate ambitions.

#### 3.1 RENEWABLES IN ELECTRICITY

Mobilising private investment for the development in renewables is essential in the context of increased ambition. In REDII, there are now several provisions aiming to promote the use of renewable power purchase agreements (contract under which a natural or legal person agrees to purchase renewable electricity directly from an electricity producer "PPAs").

##### 3.1.1 How would you rank the appropriateness of the following measures in tackling the remaining barriers for the uptake of renewable electricity that matches the expected growth in demand for end- use sectors?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Further foster regional cooperation in the deployment of renewable electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further streamline permitting procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further support the uptake of private renewable PPAs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish minimum mandatory green public procurement (GPP) criteria and targets in relation to renewable electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further support the uptake of energy communities and self-consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

##### 3.1.2 How do you think regional cooperation in deploying renewables electricity could be further promoted?

*3000 character(s) maximum*

### 3.1.3 How appropriate do you think the following measure would be in promoting the use of private renewable power purchase agreements?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Financial solutions/instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removing administrative/legal barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating green labels for buyers of renewables-based products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
None, market participants are already actively engaging	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

Public authorities, thanks to their purchasing power and often high electricity consumption, can be real drivers for change. RED II does not contain any provisions on renewable energy obligations in public procurement.

### 3.1.4 Should there be specific obligations for public authorities to contribute to achieving a high level of renewable energy (multiple answers possible)?

- Yes, all public authorities should be obliged to buy green energy
- Yes, but only larger public authorities should be obliged to buy green energy
- Yes, but only if it does not cost more
- Yes, but only if the green tender is likely to trigger investment in additional green energy generation
- No

Please explain your reply

*3000 character(s) maximum*

### 3.1.5 Do you think modifying REDII would be appropriate in order to further promote offshore renewable energy, following the adoption of the EU

## Offshore Renewable Strategy?

3000 character(s) maximum

### 3.2 RENEWABLES IN HEATING AND COOLING

Under REDII, Member States must endeavour to increase the share of renewable energy in heating and cooling by an indicative 1.3 percentage point (ppt) per year up to 2030. Sources of waste heat and cold can be counted towards the 1.3 ppt up to 40%, and in Member States where waste heat or cold is not used, the yearly increase that the Member States must endeavour to achieve is 1.1 ppt.

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in heating and cooling would constitute around 40% in 2030. This would require an increase of the share of renewable energy in heating and cooling in Member States significantly higher than the yearly increase of 1.3 ppt.

#### 3.2.1 How appropriate do you consider the following options for increasing the uptake of renewable energy in heating and cooling?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Increased energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct renewable heat use (from sustainable biomass, geothermal, solar thermal...)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct renewable electricity use (in electric heat pumps using ambient energy)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of renewable gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of district heating and cooling networks that can supply in the same system waste heat and renewable heat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain

3000 character(s) maximum

#### 3.2.2 Should the current indicative target of 1.3 ppt (or 1.1 ppt, if waste heat and cold is not used), annual average increase of renewable energy in heating and cooling set for the period of 2021-2030 in Article 23 become a



### **binding target for Member States?**

- Yes
- No

### **3.2.3 Should the annual average target of 1.3 ppt be increased?**

- Yes, to the level leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a lower level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a more ambitious level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- No

Under REDII, neither renewable electricity nor hydrogen and synthetic fuels produced from renewable electricity that is used for heating and cooling can be counted towards the target for heating and cooling, only thermal heating produced from renewable energy sources.

### **3.2.4 Do you think renewable electricity used for heating and cooling should be counted towards the target for heating and cooling?**

- Yes
- No

### **3.2.5 Do you think that renewable hydrogen and synthetic fuels produced using renewable electricity and used in heating and cooling should be counted towards the target for heating and cooling?**

- Yes
- No

The current Article 23 of REDII provides a list of measures that Member States can use to increase the share of renewables in heating and cooling. These are physical incorporation of renewables in energy fuels supplied, direct and indirect mitigation measures (e.g. installation of renewable heating systems), and other policy measures, e.g. fiscal measures and financial incentives.

### **3.2.6 Do you think the list of measures provided in the Directive that Member States can use to increase the share of renewables in heating and cooling**

**should be expanded or made more detailed?**

- Yes
- No

**3.2.7 Do you think these measures should be made binding?**

- Yes
- Only some of them
- No

**3.2.8 How would you rank the appropriateness of the following measures in increasing the share of renewable energy in heating and cooling?**

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Pricing instruments (taxes, levies and charges)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU guidance on support schemes for renewable heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable heating and cooling obligation on energy suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stricter product regulation for heating and cooling appliances to ensure that gradually only renewable and climate neutral heating technologies can be placed on the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding regulations on technical building systems for heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory heat planning and implementation at the appropriate level (local, municipal, regional) to ensure fulfilling the renewable heating and cooling target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen corporate energy purchase agreements for heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

### 3.2.9 Which of the following measures do you think could be appropriate to encourage public authorities to identify renewable heating and cooling potentials and plan their exploitation?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Strengthening the obligation to assess renewable potentials for heating and cooling in the frame of the comprehensive heating and cooling assessments under Article 14 (1) of EED and Article 15(4) of REDII	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A separate assessment obligation of renewable potentials for heating and cooling under RED II	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory long-term strategies for decarbonising heating and cooling with binding milestones and measures taking into account synergies with other policy areas, such as the comprehensive heating and cooling assessments under Article 14 (1) of the EED and the longterm building renovation strategies under Article 2a of the directive amending the EPBD.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

### 3.3 RENEWABLES IN DISTRICT HEATING AND COOLING

Efficient district heating and cooling can play an important role in mainstreaming renewable energy in heating and cooling. Under REDII Member States must endeavour to increase the share of renewable energy in district heating and cooling by an indicative 1 percent point per year up to 2030. Alternatively, Member States must ensure, subject to limited exceptions, that third party suppliers can connect and sell renewable energy and waste heat or cold to district energy networks. The 1 ppt target of annual average increase in renewables can be fulfilled by waste heat and cold in district heating networks (waste heat flexibility).

#### 3.3.1 Should the current indicative target of 1 ppt annual average increase of renewable energy in district heating and cooling set for the period of 2021-2030 become a binding target?

- Yes
- No

**3.3.2 Should the level of the current indicative target of 1 ppt annual average increase of renewable energy in district heating and cooling be increased?**

- Yes
- No

**3.3.3 How would you rank the appropriateness of the following measures in encouraging the use of waste heat and cold by district heating and cooling networks?**

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Obligation for district heating and cooling network operators to connect waste heat and cold suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for industrial and service sector companies (e.g. data centres) producing significant waste heat and cold to make available their waste heat and cold to district heating and cooling companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for the relevant competent authorities to encourage cooperation between industrial and service sector companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for the relevant competent authorities to prepare the necessary plans (heat plans, energy plans, energy infrastructures plans, spatial plans, etc.), policies or regulations enabling the feeding of waste heat and cold into district networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific target for waste heat and cold use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

### 3.3.4 Do you consider that third party access to district heating networks by renewable heat suppliers should be strengthened?

- Yes
- No

Please explain your reply

*3000 character(s) maximum*

### 3.3.5 Which of the following measures do you think would be appropriate in strengthening the rights of consumers in district heating and cooling networks?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Improve information to consumers on the energy performance and renewable shares of district heating and cooling, including to low-income and vulnerable consumers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased transparency of heat and cold supply prices to consumers and their components (e.g. energy and, network costs, taxes, levies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen disconnection [1] rules for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make it easier for consumers to switch to renewable supplies within a network via either a single buyer model or third party access or guarantees of origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make it possible for consumers to feed renewable heat or waste heat and cold into the network (prosumer rights)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] RED II allows customers to disconnect from those district heating or cooling systems that are not efficient or do not become efficient by 31 December 2025, in order to produce heating or cooling from renewable sources themselves.

Other? Please specify and/or explain your choice of the previous questions.

### 3.3.6 How appropriate do you think the following measures are in making district heating and cooling systems be better integrated within the overall energy system?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Better coordination with electricity and gas TSOs and DSOs to plan network investment and integrate flexibility to maximise renewable integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removing barriers to renewable thermal energy storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of the use of flexible renewable generation capacities (e.g. heat pumps, cogeneration, power to heat)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of district heating and cooling systems in EU, national and local energy infrastructure planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of variable renewable electricity and heat in urban planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 3.4 RENEWABLE ENERGY IN BUILDINGS

Buildings account for 40% of energy use in the EU, and heating and cooling is responsible for around 50-80% of that energy consumption. Three quarters of heating and cooling in buildings is still supplied from fossil fuels. The EU building stock should be carbon-neutral by 2050. The Renovation Wave initiative aims to address the current low renovation rates across the EU and accelerate the transformation of the EU building stock into a highly energy efficient and decarbonised building stock by 2050. Contributing in this perspective, REDII requires Member States to introduce measures in their building regulations and codes to increase the share of energy from renewable sources in the building sector, but does not set any particular target or level for this. On average the percentage use of renewables in buildings is 23.5%.

### 3.4.1 Do you think that Member States should require a minimum percentage of renewable energy in the energy use of new buildings or buildings subject to major renovation?

- Yes
- Yes, only for new buildings
- Yes, only for buildings subject to major renovation
- No

**3.4.2 If yes, what minimum percentage of energy consumed by a building do you think must come from renewable sources?**

- 10%
- 20%
- 30%
- 40%
- 50%
- 100%
- Other

**3.4.3 How would you rank the following measures in terms of their appropriateness in ensuring that buildings' heating and cooling systems are increasingly based on renewable energy while fossil fuels are gradually phased out?**

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Set minimum renewable energy levels (see 3.4.1) in REDII and ensure conformity in building regulations and codes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify permitting and administrative procedures for the integration of renewable energy solutions in buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set minimum renewable energy shares for heating and cooling in national building stocks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set specific renewable energy requirements at district or neighbourhood levels, i.e. nearly zero-energy districts.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extend REDII provisions on selfconsumption, applicable to electricity, to heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen consumer information and accessibility of measures to deploy renewables in buildings' heating and cooling systems, in particular in low-income or vulnerable households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

Heating systems in building are generally replaced when they break down, usually during winter when it is urgent, leading to suboptimal decisions favouring replacement with the same, generally fossil fuel appliance. A planned replacement of heating systems would enable consumers to make informed choices and prepare the installation of renewable and more efficient heating.

**3.4.4 How would you rank the appropriateness of the following measures in improving the replacement of heating systems, in particular to encourage the replacement of fossil fuel appliances by renewable heating systems?**

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Heating system replacements should be coordinated with and be part of building renovation whenever there is major renovation of a building or at other trigger points in the life-cycle of a building for carrying out energy efficiency renovations [1].	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Building renovation programmes (at national, municipal and district levels) should specifically support the modernisation of heating systems by their replacement with renewable technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Performance Certificates and heating system inspections should indicate recommended dates, steps and possible options for renewable heating systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National building renovation strategies should specifically address the transition from fossil fuel to renewable and climate neutral heating with related investment plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fossil fuel heating systems replacement with renewable and other climate neutral ones (like waste heat) should be part of neighbourhood and district approaches to building renovation and urban renewal programmes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information campaigns should also target heating system replacement programmes with appropriate advice and information,	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



including regarding financing and public support opportunities and solutions				
Digitalization should give early warnings on the need for repair/maintenance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] A trigger point could be: a transaction (e.g. the sale, rental or lease of a building, its refinancing, or a change in its use) a renovation (e.g. an already planned wider non-energy-related renovation).

### Other? Please specify

*3000 character(s) maximum*

## 3.5 RENEWABLE ENERGY USE IN INDUSTRY

Industry is a big energy user being responsible for 25% of the final energy consumption. However currently there are no specific provisions or targets related to the use of renewable energy for the sector. The Commission’s Energy System Integration Strategy and Hydrogen Strategy have however identified industry as an economic sector where rapid progress is required to increase the use of renewable energy, be it through direct use of renewable heat, through electrification, or through the use of renewable and lowcarbon fuels to replace fossil fuels as feedstock and fuel.

### 3.5.1 Do you think there should be an obligation on industry or certain industrial sectors to use a minimum amount of renewable energy?

- Yes, on industry in general
- Yes, but for specific industries only
- No

### 3.5.2 How would you rank the appropriateness of the following additional measures to encourage the use of renewable energy in industry?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Creation of renewables-based industrial parks/clusters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technical support, including training and skills development, for uptake and integration of renewables in small- and medium-size enterprises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific innovation programmes to develop renewables- and electricity based production processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Energy audits required under the Energy Efficiency Directive should cover renewable energy used by the enterprise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplified permitting and administrative support for corporate sourcing of renewables, including for on-site and near-site generation as well as corporate renewable power purchase agreements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contracts for difference for zero-carbon products and services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Other? Please specify

*3000 character(s) maximum*

## 3.6 RENEWABLE ENERGY IN TRANSPORT

Under REDII, each Member State must set an obligation on fuel suppliers to ensure that renewable energy makes up at least 14%<sup>[1]</sup> of the energy used in that Member State in the transport sector.

The achievement of the target is facilitated by **several multipliers on energy content**:

- a multiplier of 4 for renewable electricity consumed in **road transport**
- a multiplier of 1.5 for renewable electricity consumed in **rail transport**
- a multiplier of 1.2 for renewable fuels consumed in **maritime and aviation transport**
- a multiplier of 2 for advanced **biofuels and biogas**

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in transport would constitute around 24% in 2030, calculated according to the methodology described above. Both the aviation and maritime sectors will need to scale up efforts to increase the use of sustainably produced renewable and low-carbon fuels. This will be assessed in greater detail in the context of the ReFuelEU Aviation and FuelEU Maritime initiatives.

<sup>[1]</sup> Member States have the right to lower their target if they set limitations on food and feed-based biofuels going beyond RED II

### 3.6.1 Do you think that the level of the renewable target in transport should be increased?

- Yes, but less ambitious than indicated in the 2030 Climate Target Plan
- Yes, as ambitious as indicated in the 2030 Climate Target Plan (24%)
- Yes, but more ambitious than indicated in the 2030 Climate Target Plan (for instance 24% without multipliers)
- No

## Please explain your reply

*3000 character(s) maximum*

As per previous answers to this questionnaire, emissions from the transport sector need to be reduced by 90% by 2050 whereas they currently account for 25% of the total GHG emissions in the EU and road transport emissions alone account for 21% of the total EU emissions.

The EU transport sector is still 98.4% reliant on fossil fuel and progress towards lowering the carbon footprint of fuels, measured by progress towards the Fuel Quality Directive Art. 7a objective has been slow. Only 2 Member States have achieved the target and 3 have met the intermediate 2017 target. The only tangible contributor to this objective has been sustainable biofuels.

In this context, the Commission should take stock of the shortcomings of the approach that has been taken on renewables in transport and crop-based biofuels in particular. The design of RED II puts renewables against each other instead of focusing on replacing fossil fuels as much as possible. This approach initiated by the ILUC Directive, has hindered greater renewable energy incorporation.

1. In light of the Green Deal ambitions, the legislative development since RED II development, incl. the identification of those biofuels feedstock that drive deforestation (high ILUC-risk biofuels, i.e. palm) and evidence brought forward by the Renewable Energy Progress Report, it would be wise to reassess the current cap on crop-based biofuels. Penalising high environmentally performing biofuels such as European renewable ethanol, produced by ePURE members, which delivers on average more than 72% GHG emissions savings compared to fossil fuels, is not the way to go. ILUC concerns on crop-based biofuels do not relate to crops produced in Europe for ethanol.

2. RED II targets and sub-targets should only be revised upwards, without the possibility to reduce them, as is presently the case through reduced crop-based biofuels cap and the use of artificial multipliers. The target of at least 14% is not sufficient to achieve the ambitions set out in the European Green Deal and the 2030 Climate target plan.

3. As confirmed in the Renewable Energy Progress Report for 2020, the EU renewable energy policy framework has been highly unstable and inconsistent, This instability has hindered investors certainty and delayed the necessary deployment of renewable energy in transport.

4. Advanced biofuels must remain supported through a dedicated sub-target of at least 3.5% by 2030 based on the current Annex IX-A feedstock list. Any revision of the existing Annex IX-A feedstock list must be undertaken with stringent due diligence as described in Art. 28 of RED II and be coupled with an increase of the overall mandate, corresponding to the market potential of the newly added feedstocks. If not, the existing and planned investments triggered by the RED II mandate will be devalued.

**3.6.2 Member States can count renewable electricity, sustainable biofuel and biogas, hydrogen produced from renewable electricity (except if such electricity comes from biomass) and recycled carbon fuels[1] towards the 14% target in transport. Do you think Member States should also be able to count other low carbon fuels which have fewer emissions than fossil fuels, such as low carbon hydrogen?**



Yes

No

[1] 'recycled carbon fuels' means liquid and gaseous fuels that are produced from liquid or solid waste streams of non-renewable origin which are not suitable for material recovery in accordance with Article 4 of Directive 2008/98/EC, or from waste processing gas and exhaust gas of non-renewable origin which are produced as an unavoidable and unintentional consequence of the production process in industrial installations.

### 3.6.3 Do you think that some renewable and low carbon fuels should be specifically promoted in transport, beyond being part of the obligation on fuel suppliers ?

Yes

No

### 3.6.4 If you answered 'yes' to the previous question, which of the following types of renewable and low carbon fuels do you think should be specifically promoted ? (Multiple answers possible)

- Advanced biofuels and other fuels produced from biological wastes and residues
- Renewable hydrogen and renewable synthetic fuels
- Low-carbon hydrogen and low carbon synthetic fuels (including through applying CCS techniques)
- Renewable electricity
- Recycled carbon fuels
- Other

Please specify

*3000 character(s) maximum*

Re. Advanced biofuels:

The deployment of advanced biofuels from RED II Annex IX-A feedstock should build on existing legislation and industry, to secure investor confidence, which is a prerequisite for any new investment into renewable fuels.

Advanced biofuels must be established as an additional instrument to further reduce fossil fuel use and GHG emissions and remain supported through a dedicated ramping-up sub-target leading to min. 3.5% by 2030 based on the current Annex IX-A feedstock list, without multipliers but associated penalties for non-compliance.

Re. Crop-based biofuels:

Crop-based biofuels are an immediate and cost-effective tool to reduce emissions of the existing and future light and heavy-duty vehicles, considering their number (95.9% of the total passenger cars fleet in 2018 according to ACEA and in 2019 89.4% of the new registered cars were conventionally-fueled) and lifespan. Their use should not be limited to transport modes that cannot be electrified.

The crop cap set by the ILUC Directive and amended under RED II should be revised upwards, to provide each Member State with flexibility, taking into consideration the current crop-based biofuels market uptake, higher renewables and emissions reduction targets, and that the delegated act on high-ILUC risk biofuels has been adopted since then. European crops do not drive deforestation nor commodity prices, and only high-ILUC-risk biofuels must be limited and then progressively phased out.

### 3.6.5 Which types of renewable and low carbon fuels can be best promoted by an obligation on fuel suppliers, based either on energy content or GHG emissions, compared to other instruments?

- Liquid renewable fuels
- Liquid low carbon fuel
- Gaseous renewable fuels such as hydrogen
- Gaseous low carbon fuels such as hydrogen
- Renewable electricity
- Other

### 3.6.6 How would you rate the appropriateness of the following measures regarding the use of renewable and low carbon fuels in transport?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
The scope of fuels that can be counted should be harmonised to ensure that all fuels that are eligible for counting towards the renewable energy target are supported in all Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should have flexibility to design the supply obligation using one of the following approaches: in terms of volume, energetic value or GHG emission intensity.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The fuels supply obligation should be based on GHG emissions targets to stimulate the uptake of best performing fuel options on the fuel market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The level of ambition should be fixed at the same level for all Member	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
States to create a level playing field and avoid market fragmentation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The multiplication factors for different types of renewable energy sources should be abolished to simplify the legislation and to increase the ambition level (limitations and sub targets would remain)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set out specific measures to promote the use of renewable and low carbon fuels in aviation and maritime transport such as dedicated supply obligations, sub-targets or other incentives.[1]	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] In parallel, the ReFuelEU Aviation and FuelEU Maritime initiatives are assessing legislative options to boost the production and uptake of sustainable fuels in the aviation and maritime sectors.

### Other? Please specify

*3000 character(s) maximum*

### 3.6.7 How appropriate do you think the following measures would be in encouraging the use of hydrogen and hydrogen-derived synthetic fuels in transport modes that are difficult to decarbonise?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Include hydrogen and hydrogen-derived synthetic fuels in a dedicated sub-target together with advanced biofuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Set an additional dedicated sub-target for hydrogen and hydrogen-derived synthetic fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allow double counting of the contribution of hydrogen and hydrogen-derived synthetic fuels towards the transport target or the fuel supplier obligation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

### Other? Please specify

*3000 character(s) maximum*

The possible inclusion of new feedstock in Annex IX should not take place in isolation of a discussion on the Annex IX-A and B biofuels contribution:

- Considerations must be given to the potential contribution of the different pathways and the legislation (caps and sub-targets) needs to be adapted to reflect these.
- To preserve investments decisions, the existing sub-target and cap associated to Annex IX-A and B feedstock under RED II must be met based on the existing lists.
- Hydrogen to produce conventional fossil fuels have to be excluded since it contradicts the principle to replace fossil fuels as much as possible.

### 3.6.8 How would you rank the effectiveness of the following measures in encouraging the use of renewable electricity in the transport sector?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Support the purchase of electric vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the installation of electric vehicle chargers in households and enterprises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set stricter CO2 standards for cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the availability and interoperability of public recharging infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish a minimum level of renewable electricity as a part of the target for renewable energy in transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Giving consumers information on whether they are recharging their electric vehicle with renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

*3000 character(s) maximum*

Stricter CO2 standards for cars are not encouraging the use of renewable electricity in the transport sector as long as they are not based on lifecycle analysis.

## 3.7 BIOENERGY SUSTAINABILITY

The Biodiversity Strategy[1] acknowledges that, to mitigate climate and environmental risks created by the increasing use of certain sources for bioenergy, REDII already includes strengthened sustainability criteria (to be implemented on the ground starting 1 July 2021 at the latest) and promotes the shift to advanced biofuels. According to the Strategy, the use of whole trees and food and feed crops for energy production should be minimised. Moreover, the Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system[2] contains concrete measures for a sustainable use of biomass. The

Commission is continuously assessing the EU and global biomass supply and demand and related sustainability. An ongoing study on the use of forest biomass for energy production is expected to be finalised and published by the end of 2020. This will inform the Commission's policy-making, including the review and revision, where necessary, of the level of ambition of the Renewable Energy Directive. In order for Member States to count energy from forest biomass towards their renewable energy targets, Article 29 paragraphs 6-7 of REDII requires that the country of origin has laws in place to ensure the legality of harvesting and forest regeneration. If that cannot be shown, sustainability compliance must be shown at the level of the biomass sourcing area (e.g. through forest management certification or equivalent tools)

[1] COM/2020/380 final

[2] COM/2020/381 final

### **3.7.1 Do you think the sustainability criteria for the production of bioenergy from forest biomass in RED II should be modified? (only one reply possible)**

- Yes, they should be made stricter
- No, they should not be modified

Please explain your reply

*3000 character(s) maximum*

### **3.7.2 The obligation to fulfil sustainability criteria for biomass and biogas in heat and power applies to bioenergy installations of at least 20 MW for solid biomass and 2 MW for biogas. Should these thresholds be lowered to include smaller installations?**

- Yes
- No

### **3.7.3 Do you think that there should be limits on the type of feedstock to be used for bioenergy production under REDII?**

- Yes, it should only be possible to use feedstock listed in Part A) of Annex IX of REDII[1] (therefore excluding used cooking oil and animal fats)
- Yes, it should only be possible to use the feedstock listed in Part A) and Part B) of Annex IX of REDII
- Yes, it should only be possible to use wastes and residues
-



Yes, it should only be possible to use feedstock that does not have higher added-value in nonenergy sectors

- Yes, in some other way
- No

Please explain your answer

*3000 character(s) maximum*

The last Renewable Energy Progress Report released by the Commission on 14 Oct. 2020 found that in 2018, biofuels were the main renewable sources used in transport, accounting for 89% of the RES-T. Annex IX biofuels made up only 24% of that amount. In this context, while supporting a progressive deployment of Annex IX A biofuels, the exclusion of crop feedstock for bioenergy production would be both dangerous and not justified.

Indeed, all the controversies surrounding European crop-based biofuels, and ethanol in particular, have been debunked in the last few years. The 2020 Renewable Energy Progress Report also found no correlation between food prices and biofuel demand in the EU in recent years. In addition, most Member States report limited cultivation of feedstock used in biofuel production (which, in total, accounts for 3% of EU cropland) compared to total agricultural activities and therefore consider that associated environmental impacts are low.

Therefore, there is no reason to limit the use of feedstock to produce bioenergy to Annex IX A and B of the RED II. However, the cap on Annex IX B should be kept, as long as there is distortion caused by multipliers.

At the same time, all sustainable renewable low carbon fuels able to contribute towards the RES-T target should come from sustainable feedstock which respects EU's climate and renewable objectives, not at least European standards for agricultural production, GMO policy, waste prevention and managements standards, and strict traceability requirements. Consistent with its climate agenda, the EU must require that feedstock for renewables eligible to count towards the targets originates in countries that are parties to the Paris Agreement.

The ongoing evaluation of the list of feedstocks should not distract Member States from their obligation to meet the agreed 2020 targets under RED I and to transpose RED II into national legislation by end June 2021. This includes the sub-target for advanced biofuels from Annex IX-A existing list(s).

The possible inclusion of new feedstock in Annex IX should not take place in isolation of a discussion on the Annex IX-A and B biofuels contribution. In particular, considerations must be given to the potential contribution of the different pathways and the legislation (caps and sub-targets) needs to be adapted to reflect these. Also, to preserve investments decisions, the existing sub-target and cap associated to Annex IX-A and B feedstock under RED II must be met based on the existing lists.

**3.7.4 Do you think that the minimum GHG emission saving thresholds for biomass in heat and power, currently at 70% for installations starting operation from 2021 and at 80% for installations starting operation from 2026, should be extended and/or made stricter? (multiple answers possible)**

- Yes, by extending them to heat and power installations that started operation before January 2021
- Yes, by increasing the threshold for GHG emission savings
- No
- Other

**3.7.5 Do you think that the energy efficiency requirements applying to bio electricity-only installations (article 29, paragraph 11) should be made more stringent (multiple answers possible)?**

- Yes, they should be extended to plants of less than 50 MW total rated thermal input
- Yes, the energy efficiency requirements should be higher
- No
- Other

**Contact**

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