



EU Biofuels Chain

Joint position paper on the revised Sustainable finance draft Delegated Regulation: Biofuels should be part of the solution for the EU transition to carbon neutrality

The EU Biofuels Chain supports the final objective of the Sustainable Finance Regulation: to enable financial flows to support sustainable growth and transition to a carbon neutral economy. We acknowledge the principle that the EU taxonomy should not contradict the European Green Deal objectives to fully deliver on the increased EU climate ambition. In the context of the revised draft delegated act, which was discussed by the Member States’ Expert Group on Sustainable Finance on 24 March 2021, the associations representing the EU Biofuels Chain:

1. Welcome two significant improvements compared to the draft submitted to the public consultation, but warn that further corrections are needed.

- The manufacture of biogas and biofuels for use in transport would no longer be considered as transitional, as it clearly belongs to the activities referred to in Article 10 (1) of Regulation (EU) 2020/852, namely: (c) increasing clean or climate-neutral mobility; and (h) producing clean and efficient fuels.
- The draft delegated act rightly states that food and feed crops could be used in the production of biochemicals and bioplastics. However, distinguishing between the types of feedstock eligible for biofuels and biochemicals (polymers) would ignore the reality of the functioning of biorefineries, which work with multiple inputs and outputs. Moreover, we do not see the reasoning behind the addition of a specific target of GHG emissions reduction of -27% compared to fossil fuel feedstock.

2. Strongly oppose the fact that food and feed crops could not be used for the manufacture of biofuels in contradiction with the RED II.

- The Renewable Energy Directive (RED II) defines and supports sustainable biofuels (including crop-based ones that [account](#) for over 64% of biofuels use in the EU, and 58% of the renewable energy in transport alone), yet the draft delegated act does not bring any new element that would justify deviating from RED II comprehensive sustainability criteria.
- On the contrary, excluding crop-based biofuels would go against the findings of the Commission’s [Renewable Energy Progress Report](#), which underlines that these biofuels have significantly contributed to CO₂ emissions reduction in the transport sector in 2018 without causing adverse environmental impacts, and would disregard the ongoing implementation of RED II.
- The reference to “food and feed crops” should be eliminated from chapter 4.13 “Manufacture of biogas or biofuels for use in transport” to allow all sustainable biofuels to be part of the solution of the transition to carbon neutrality.

3. Remind that the European Commission itself assumes that an even higher renewable energy share of 24% in transport is required to ensure that the transport sector contributes sufficiently to the 55% GHG saving target of the Green Deal.

- The proposed greenhouse gas emission savings from the manufacture of biofuels and biogas for use in transport of at least 65% in relation to the GHG saving methodology, and the relative fossil fuel comparator set out in RED II Annex V, deserves a specific assessment.
- Considering that transport has the lowest share of renewable energy use, all sustainable transport fuels eligible under RED II should be also eligible in the EU taxonomy to ensure that sustainable finance fully contributes to the transition to a carbon neutral economy.



The EU Biofuels Chain includes:

Founded in 1953, **CEFS** represents European beet sugar manufacturers, cane sugar producers and refiners covering sugar production in 18 EU countries (Austria, Belgium, Croatia, the Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Lithuania, Poland, Romania, the Netherlands, Slovakia, Spain, Sweden) plus the United Kingdom and Switzerland.

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 15 EU countries (Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, the Netherlands, Poland, Romania, the Slovak Republic and Sweden) and roughly 130,000 growers from 3 non-EU countries (the United Kingdom, Switzerland and Turkey).

COCERAL is the European association of trade in cereals, oilseeds, pulses, olive oil, oils and fats, animal feed and agrosupply. It represents the interest of the European collectors, traders, importers, exporters, and port silo storekeepers of the above-mentioned agricultural products. COCERAL's direct members are located in 14 EU countries, with one European association, Unistock representing the professional portside storekeepers for agribulk commodities within the EU and one associated member in Switzerland. With about 3,000 companies as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. Gafta is an extraordinary member of COCERAL.

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.

The **European Biodiesel Board (EBB)** is a non-profit organisation established in January 1997. Today, EBB gathers close to 60 members across 21 Member-States, which represents 75% of the European output. Biodiesel is the main European solution to reduce emissions from transport and dependence on imported oil. EBB aims to promote the use of biodiesel in the European Union and is committed to fulfil International standards for sustainability in GHG emissions and sustainable feedstock. EBB is constantly working towards the development of improved and greener technologies.

The **European Oilseed Alliance (EOA)** brings together the oilseed producing organizations from the main European countries (Germany, France, UK, Poland, Czech Republic, Sweden, 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 speaks for 35 member companies and associations (including 19 producers), with around 50 production plants in 16 member states, accounting for about 85% of the renewable ethanol production in Europe.

FEDIOL represents the interests of the **European vegetable oil and protein meal industry**. With over 180 facilities in Europe, the sector provides over 20.000 direct employments. Our members process approximately 55 million tonnes of basic products a year for the food and non-food markets. Oilseed crushing produces vegetable oils and protein meals as co-products. While vegetable oils are used for food and technical uses (pharmaceuticals, paints, detergents, biodiesel, etc.), protein meals are used to meet the increasing global demand for meat and protein.