

ePURE contribution to the public consultation on the Post-2030 Renewable energy framework

Executive summary and recommendations overview:

1. **Falling short on EU transport decarbonisation: RED III targets in transport will not be met 4**
 - Removing the current national caps and other limitations;
 - Introducing a revised crop-biofuels cap up to 10%;
 - Removing provisions allowing Member States to lower their ambitions when applying lower crop-cap;
 - Increase the post-2030 renewable energy share and greenhouse gas emissions reduction targets for transport to accelerate fossil fuel displacement and support all sustainable renewable fuel solutions;
 - Enable the EU-wide deployment of higher ethanol blends such as E20 and E85 and revise the Fuel Quality Directive to facilitate the market uptake of fuels with higher renewable content;
 - Ensure a regulatory framework that recognises all sustainable biofuels and removes barriers to their contribution across road, aviation and maritime transport;
 - Establish a long-term framework for RED sustainable bio-based value chains to accelerate fossil carbon substitution.

2. **Enhancing sustainability and greenhouse gas emissions saving criteria for biofuels 8**
 - Maintain current GHG thresholds for existing installations;
 - Reflect the sector's growing decarbonisation potential by increasing the GHG emission savings threshold to 70% for biofuels produced in new installations from 2030 onwards;
 - Provide targeted support to enable both new and existing installations to further decarbonise.

3. **Ensuring fairness and accuracy: Inconsistent GHG accounting across different renewable fuel pathways undermine technology neutrality and EU competitiveness 9**
 - Harmonising methodologies across fuel pathways;
 - Better accounting for transport emissions and reward locally sourced feedstocks;
 - Ensuring a level playing field across all renewable fuel types;
 - Removing the time limitation on *eccr* eligibility.

4. **Restoring a level playing field for European renewable ethanol feedstocks 11**
 - Reinforced oversight and verification of feedstocks and biofuels with a higher risk of fraud;
 - Proportionate and risk-based traceability requirements from the point of origin of biomass under the UDB;
 - Address structural distortions of competition.

ePURE - the European Renewable Ethanol Association- represents bioethanol producers from crops, wastes and residues all committed to sustainable transition towards zero-emission mobility and sustainable bio-based solutions. Renewable ethanol is a certified, sustainable fuel that currently deliver on average 81.6% GHG savings compared to fossil fuels.¹ Crop based biofuels like **renewable ethanol are a proven, scalable and immediately available solution to reduce GHG emissions from road transport**. Moreover, EU's sustainable crop-based biofuels sectors and scientific data have repeatedly demonstrated strategic domestic assets of EU biorefineries producing food, feed and fuel and contributing to **EU goals for climate change mitigation, energy independence, food security, and supporting to the rural sector and a competitive economy**.

As dramatic geopolitical repositioning requires Europe to think more about its resilience, competitiveness and independence, there has never been a more important time for the EU to adopt policies that make the best use of strategic domestic assets. This memo outlines the strategic value of crop-based biofuels alongside advanced ones, addresses common misconceptions, and provides actionable policy recommendations for the upcoming update of Renewable Energy Directive (EU) 2018/2001 review. By adopting a technology-neutral, science-based pragmatic approach, the EU can unlock the full potential of sustainable biofuels and achieve its climate, energy, and economic goals.

Key points

The transformation and defossilisation of transportation and industry require scalable, readily available solutions that are compatible with existing infrastructure. The use of biomass meets all these criteria. Agriculture plays a particularly important role in terms of scalability, as it accounts for over 60% of the biomass (dry matter) mobilized annually in the EU.

A central but often overlooked reality is that the use of first-generation biomass for non-food applications reinforces, rather than threatens, food security. By creating stable and diversified outlets for agricultural production, biofuel markets contribute to greater overall availability of feedstocks – available should a crisis occur - and improved market resilience, as demonstrated in the **recent study** from the **Nova Institute**². The long-standing “food versus fuel” narrative is not supported by evidence. On the contrary, sustainable biofuel production plays a positive role in stabilising agricultural markets, supporting farmers’ incomes, and strengthening food and feed systems.

At the same time, the EU is a net exporter of grains which weakens the case from restricting their use in ethanol production. With a structural surplus that is consistently channelled to export markets, European cereals are often sold as low-value raw commodities, sometimes at prices that put pressure on farm profitability. Instead of exporting low-value raw commodities, the EU should prioritise domestic valorisation, converting cereals into ethanol, animal feed, food ingredients, and other bio-based products. Such an approach would not only create added value within the EU economy, but also reinforce strategic autonomy, rural development and industrial competitiveness.

More broadly, as in most third countries such as the US and Brazil, the EU must fully recognise the strategic value of non-food uses of primary biomass. Biofuels production is closely linked to the generation of high-protein animal feed co-products and other valuable products (e.g. biogenic CO₂), creating a strong complementarity between the energy and agricultural sectors. This integrated model enhances resource

¹ Aggregated and audited data of ePURE members and other bioethanol producers for 2025 for volumes certified under RED II methodology, June 2026. [URL](#)

² Nova Institute, “Benefits of Using First-Generation Biomass for Food, Fuels, Chemicals and Derived Materials in Europe”, 2025. [URL](#)

efficiency and supports more sustainable and circular agricultural systems. Furthermore, the development of low-carbon agricultural practices can be further encouraged by promoting their integration into energy production pathways, on a voluntary national basis.

However, this potential is currently constrained by a lack of long-term policy visibility and coherence. Uncertainty in EU energy legislation discourages both new investments and the viability of existing production capacity. At the same time, inconsistencies between energy policy and trade policy risk undermining the very objectives the EU seeks to achieve. Promoting renewable energy as a pillar of Europe's energy and food sovereignty requires a coherent framework that aligns internal ambitions with external trade rules. As highlighted by the Draghi report on EU Competitiveness³, a stronger emphasis on a "Made in Europe" approach is essential. Rewarding locally sourced feedstocks and EU-based production would help mitigate global market distortions, secure supply chains and anchor investments within Europe.

With the war in the Middle East and its impact on global energy markets and supply chains, the need for greater European resilience, competitiveness and independence has become more urgent than ever. Reducing reliance on imported fossil fuels requires the EU to optimise the use of reliable, domestically available renewable resources, such as European bioethanol. This is not only a climate imperative, but also a matter of economic security and geopolitical stability.

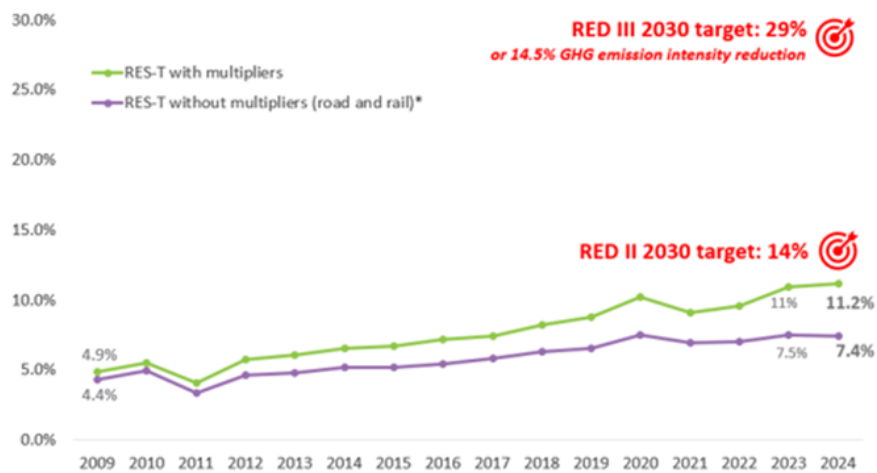
More fundamentally, the energy transition cannot be built on a single technological pathway. There is no "perfect" energy solution capable of meeting all needs across sectors and uses. Electricity will play a central role but it cannot substitute all energy uses, nor can it alone guarantee resilience and affordability. However, electricity – unlike biomass – does not provide molecules storing energy or ready for material use. At the same time, artificial tools such as multipliers or an excessive reliance on technologies that are not yet scalable, risk widening the gap between ambition and delivery. A successful transition must therefore be based on a diversified and pragmatic energy mix, leveraging the complementary strengths of different renewable solutions. In this context, renewable ethanol should not be seen as a transitional or secondary option, but as a key pillar of the future renewable energy framework, alongside electrification.

By combining scalability, affordability, availability and strong sustainability performances, renewable ethanol can deliver immediate and measurable emissions reductions while supporting broader economic, socially-inclusive and strategic objectives.

³ The future of European competitiveness: Report by Mario Draghi, September 2024, [URL](#)

1. Falling short on EU transport decarbonisation: RED III targets in transport will not be met

An uncomfortable truth stands in the way of the key RED III ambition to reach a Renewable Energy share in Transport (RES-T) of 29% or a 14.5% Greenhouse Gas (GHG) emission reduction by 2030: **renewables in transport have been growing at an insufficient pace**, while the absolute quantity of fossil energy in use has been increasing rather than decreasing. To the same extent, the EU is already falling short of meeting its RED II target of 14% RES-T.



Source: Renewable energy share in transport in the EU, Eurostat, SHARES 2026

The facts

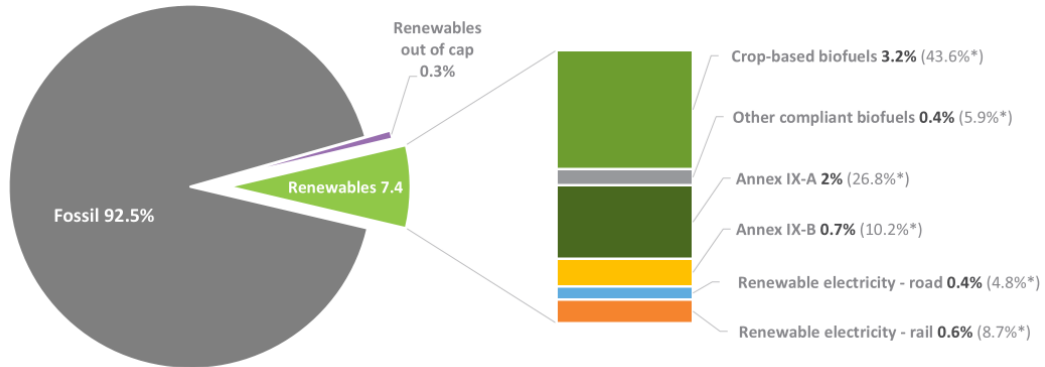
Currently, **249 million passenger cars are registered in the EU, more than half of which still use gasoline engines (either ICE or hybrid)**, ICE and hybrid vehicles will remain a major share of the fleet despite electrification ⁴. Hence, renewable liquid biofuels are indispensable to defossilise today's as well as tomorrow's fleet. While the European Commission is revising the CO₂ emission standards for light-duty vehicles, the proposed framework acknowledges that decarbonising new vehicle sales by 2035 cannot rely on electrification alone. It rightly points toward the need for a more technology-neutral approach. However, the proposal falls short of fully recognising the critical role that crop-based biofuels already play in the defossilisation of road transport.

The European Commission's own statistics every year confirm that uptake of renewables in transport is being **hindered by unfounded discrimination against crop-based biofuels, leaving the EU needlessly over-reliant on fossil fuels**. According to updated figures in Eurostat's SHARES database⁵, the EU is still overwhelmingly **dependent on fossil fuel for transport**, with just 11.2% of energy coming from renewable sources. This creates a misleading picture of the actual progress towards climate goals.

⁴ [ACEA Report - Vehicles on European roads 2025.pdf](#)

⁵ [Eurostat SHARES database](#)

In fact, EU27 renewable uptake in transport in real terms is much lower. The EU27 RES-T without multipliers was 7.6% in 2024, down from 7.7% in 2023. When focusing on road and rail only, the EU27 RES-T for 2024 is down to 7.4%. This is because, between 2023 and 2024, consumption of fossil grew faster (+1.9%) than the use of renewables (+0.5%), and this disappointing performance comes nearly two decades after the Renewable Energy Directive was firstly adopted in 2009. The data also show that the impact of electrification of road transport in decarbonising EU27 transport in road and rail is negligible, with an 0.3% share of the total. Despite rising electrification of the vehicle fleet, the electricity used by most EVs is fossil-based.

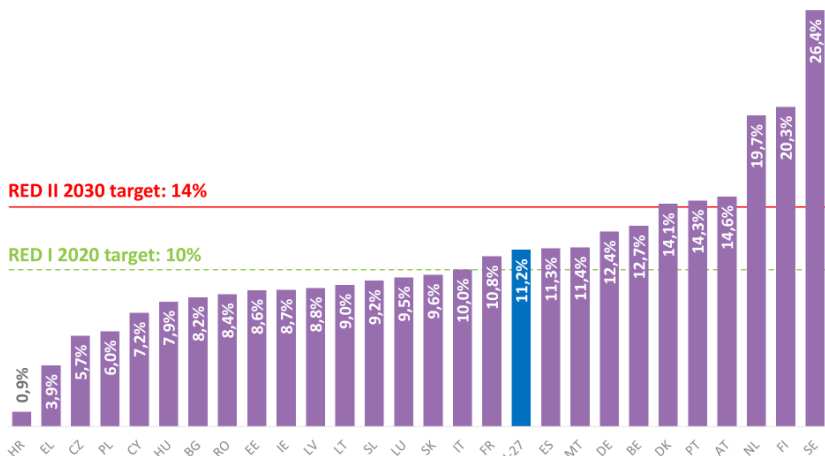


Source: Renewable energy share in transport in 2024, without multipliers, Eurostat, SHARES 2026

These figures demonstrate that reported progress is significantly overstated due to the use of multipliers and multiple counting mechanisms, particularly for advanced biofuels and renewable electricity. While these tools were originally intended to incentivise emerging technologies, they now risk distorting the true level of decarbonisation achieved; and moreover, end up encouraging the use of fossil fuels.

In this sense, multipliers merely inflate the statistical contribution of certain fuels. This creates a misleading perception of progress, allowing Member States to appear compliant on paper while real emissions reductions lag behind.

RED III 2030 adopted target: 29% (or 14.5% GHG emission intensity reduction)



Source: Renewable energy share in transport (RES-T) in 2023 per Member State with multipliers

Simultaneously, the contribution of crop-based biofuels is capped at 7% but in reality, at a much lower level in a number of EU countries. At EU level, the share of 1G biofuel is in the range of 3.2%. While these raw materials are cheaper and most available, this limitation is inconstant with the EU objective to defossilise transport and support farmer's revenue.

At the same time, the Commission's SHARES data indicate that 15 Member States will need to triple their renewable energy uptake in transport within less than four years in order to reach their REDIII targets. Moreover, as of 2024 more than half of EU MS (14 out of 27) were still falling short of the 10% RES-T target they were required to have met by 2020, even when including REDIII multipliers. Any future increase in Renewable Energy targets after 2030, whether in terms of RES-T shares or GHG reduction obligations, must be carefully calibrated to reflect current deployment constraints and market conditions. Otherwise, it would therefore pose significant implementation challenges.

Additionally, it is important to recall that the original framework established under Directive 2009/28/EC (RED I) did not include any cap on crop-based biofuels. On the contrary, the Commission's clear priority at the time was to rapidly scale up renewable energy deployment, with crop-based biofuels recognised as a central pillar of transport decarbonisation. The Directive introduced a binding 10% renewable energy target in transport precisely to ensure their uptake. This approach was driven by the recognition that the transport sector was the fastest-growing source of GHG emissions in the EU and it was (and still remains) heavily dependent on imported oil, posing a major energy security risk. At the same time, RED I established robust sustainability criteria to ensure that only biofuels delivering meaningful greenhouse gas savings would count towards the targets.

This original logic remains highly relevant today. Yet, subsequent policy developments have shifted away from this performance-based approach by introducing caps on crop-based biofuels, thereby constraining their contribution irrespective of their sustainability performance.

ePURE recommendations

The current uptake in renewable needs to be stepped up in real and tangible terms, if EU wants to phase-out fossil fuels in transport ("defossilisation"). **The renewable energy target for transport (RES-T) needs to be strengthened beyond 2030 to ensure continued progress in replacing fossil fuels** in both existing and new vehicle fleets, thereby accelerating the defossilisation of road transport. As well, building on the experience of several Member States that have implemented RED III through ambitious GHG reduction obligations, the EU should consider a long-term trajectory extending to 2040 to maximise emissions reductions across all transport modes.

Solutions enabling defossilisation of existing vehicles are also needed. Ethanol is a widely available enabler to de-fossilise vehicles running on gasoline engines, higher ethanol blends like E20 (with up to 20% ethanol content) and E85 (up to 85% ethanol – and potentially up to 100% renewable content in the future) may be deployed to accelerate the decarbonisation and defossilisation of EU roads.

To fully unlock this potential, the future Renewable Energy Directive framework must better recognise and enable the contribution of crop-based ethanol. Defossilisation of transport fuels requires scalable solutions, such as the use of agricultural crops, which are available in large quantities in the EU. In particular, Article 26 should be revised to remove the current cap on crop-based biofuels, including the provision limiting their contribution to no more than one percentage point above 2020 levels and subject to a maximum of 7%.

- A revised cap of up to 10% should be introduced, providing Member States with the flexibility to scale up sustainable domestic production where appropriate. This would provide the necessary flexibility for Member States with strong and sustainable agricultural sectors to exceed the current threshold.
- In addition, the current provisions allowing Member States to reduce their RES-T or GHG intensity reduction obligations when applying a lower crop-based cap should be removed. These provisions create regulatory inconsistencies and risk weakening overall decarbonisation efforts.
- While advanced biofuels should be encouraged, the next Renewable Energy Directive framework should phase out multipliers including for advanced biofuels, RFNBOs and renewable electricity in transport. These mechanisms obscure the real energy mix and artificially inflate renewable shares without displacing fossil fuels. They create market distortions, favouring certain pathways based on accounting advantages rather than actual emissions performance and prevent the gradual phasing-out of fossil fuels.
- Set ambitious post-2030 renewable energy and greenhouse gas emission reduction targets for transport to accelerate fossil fuel displacement and support all sustainable renewable fuel solutions.
- Higher ethanol blends such as E20 and E85 could significantly accelerate emissions reductions without requiring fleet turnover. Ethanol remains one of the most immediately deployable and scalable solutions for reducing emissions from both existing and new vehicles running on petrol engines (including hybrids). To further boost this potential, the EU should legally allow E20 deployment on the EU market in line with the CEN E20 technical specification. Furthermore, the upcoming revision of the RED should be seen as an opportunity to amend the Fuel Quality Directive (FQD) in order to facilitate the introduction of fuels with higher non-fossil and bio-content on the market.
- Adopt a technology-neutral approach to transport decarbonisation, ensuring that all sustainable biofuels meeting EU sustainability and greenhouse gas saving criteria are eligible across the relevant transport legislation. The EU should fully recognise the contribution that renewable ethanol can make to decarbonising hard-to-abate sectors and remove existing regulatory barriers that limit the use of sustainable crop-based biofuels in ReFuelEU Aviation and FuelEU Maritime regulations. All sustainable solutions, such as Alcohol-to-Jet, should contribute toward any revised Sustainable Aviation Fuels targets.
- The EU should establish a coherent and predictable framework supporting sustainable bio-based value chains across sectors whether the final application is bioenergy, bioplastics, biomaterials, or food. As the substitution of fossil carbon in materials and industrial processes is more challenging than energy substitution, a binding target by 2040 should be introduced for renewable and bio-based content in strategic sectors such as packaging, chemicals and industrial materials. Such target would create long-term market certainty, stimulate investment in EU industrial biotechnology, and accelerate the replacement of fossil carbon.

2. Enhancing sustainability and greenhouse gas emissions saving criteria for biofuels

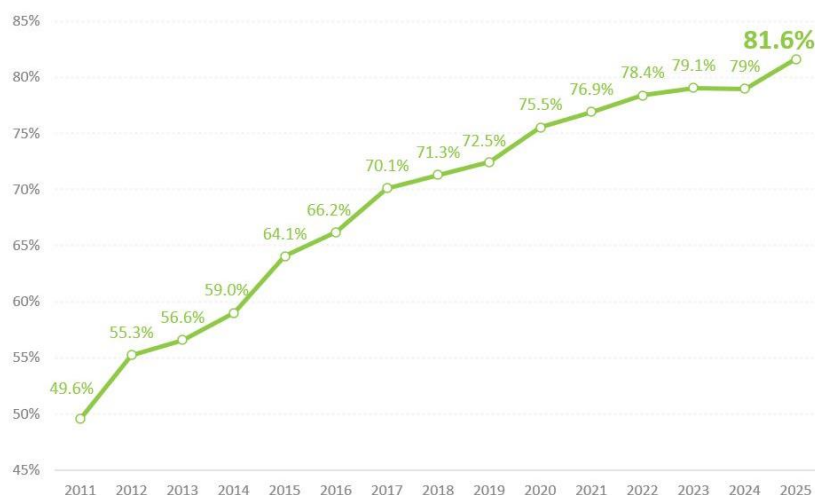
The facts

Under Article 29(10) of the RED, the minimum greenhouse gas (GHG) emission savings thresholds for biofuels consumed in transport against a fossil fuel comparator (EF(t)) of 94 gCO₂eq/MJ, which has remained unchanged since the adoption of Directive (EU) 2018/2001. These thresholds are currently set as follows:

- 50% for biofuels produced in installations operational on or before 5 October 2015;
- 60% for biofuels produced in installations starting operation between 6 October 2015 and 31 December 2020;
- 65% for biofuels produced in installations starting operation from 1 January 2021.

It should also be recognised that European ethanol biorefineries are already on a strong decarbonisation trajectory, continuously improving performance through innovations and investments such as the capture of biogenic CO₂ from fermentation processes and the deployment of high-efficiency cogeneration systems. As a result, renewable ethanol produced by ePURE members already delivers, on average, 81.6% GHG emission savings compared to fossil petrol in 2025, with some facilities approaching carbon-neutrality. Building on this progress through a supportive policy framework would enable the sector to continue contributing effectively to the EU's climate objectives. In this context, and taking into account the continuous improvements in energy efficiency used in the production process and emissions performance achieved across the sector, a higher GHG emission savings threshold could be considered for biofuels produced in new installations commencing operation from 2030 onwards, provided that existing facilities retain their current applicable thresholds and that adequate support mechanisms are available to facilitate further investments in decarbonisation.

Weighted average certified GHG emission savings in % (RED I & II)



In the context of the forthcoming review of the Renewable Energy Directive, any consideration by the Commission to increase the minimum greenhouse gas (GHG) emission savings threshold for biofuels produced in installations commencing operation after 2030 should be accompanied by an appropriate enabling framework.

ePURE recommendations

The EU's ambition to raise GHG savings thresholds is a welcome step toward deeper decarbonisation. However, ambition must be matched with support to ensure that both new and existing installations can contribute to the EU's climate goals without compromising competitiveness or investment. By recognizing past achievements, enabling future innovation, and providing targeted incentives, the RED review can strike the right balance: driving progress while safeguarding the industry's vital role in EU's sustainable transition.

- **The future framework should acknowledge and preserve the achievements of existing installations by maintaining the current thresholds (50%, 60%, 65%) for biofuels produced in facilities already in operation. This ensures continuity, avoids stranded assets and rewards early action.**
- **Consider introducing a higher GHG emission savings threshold of 70% for biofuels produced in new installations commencing operation from 2030 onwards, reflecting the continued technological progress and decarbonisation potential of the sector. Such an increase should apply only to new production sites and should not alter the thresholds applicable to existing installations.**
- **Ensure a just transition by providing appropriate EU and national support measures, funding instruments and investment incentives to both new and existing installations is essential to enable producers to meet higher GHG performance requirements while maintaining competitiveness.**

3. Ensuring fairness and accuracy: Inconsistent GHG accounting across different renewable fuel pathways undermine technology neutrality and EU competitiveness

Article 31 of the RED establishes the methodology for calculating GHG emissions from biofuels, bioliquids, and biomass fuels, with detailed production pathways outlined in Annex V. However, significant inconsistencies persist in how these pathways are applied across different technologies and feedstocks, compromising the Directive's environmental integrity and fairness.

A key shortcoming lies in the inadequate treatment of feedstock transport emissions through the e_{td} factor. The current RED framework fails to adequately address a critical gap: feedstock transport distances are not integrated into GHG calculations for biofuels. Unlike Annex VI for solid and gaseous biomass fuels, which differentiates emissions based on transport distances for various feedstocks, Annex V continues to rely on simplified assumptions that fails to capture the significant variation in emissions between locally sourced feedstocks and those transported over long distances, including from third countries. Imported feedstocks can receive e_{td} emissions values comparable to EU-produced crops despite significant disparities in

agricultural practices, supply chains and transport distances thereby distorting competition and weakening incentives for more sustainable production. This lack of granularity not only weakens the environmental integrity of the RED's GHG accounting but also penalise domestic producers who prioritize shorter and sustainable supply chains.

A second major inconsistency concerns the GHG accounting rules when fully renewable electricity is used to produce biofuels or RFNBOs.

- For RFNBOs, Article 26(6) of the RED, together with Delegated Regulation (EU) 2023/1184, establishes detailed and harmonised rules governing the conditions under which electricity can be considered fully renewable. Furthermore, Delegated Regulation (EU) 2023/1185 explicitly provides that electricity qualifying as fully renewable is attributed zero GHG emissions for the purpose of RFNBO GHG accounting.
- For biofuels, Annex V, Part C (11) adopts a less favorable approach. The GHG emission intensity of electricity used in biofuel production is assumed to equal the average emission intensity of the grid in a defined region. While a limited derogation allows for the use of an average value for individual off-grid plants, there are no clear rules on how electricity used in biofuel production can qualify as fully renewable, and, whether fully renewable electricity should be attributed zero GHG emissions.

This asymmetry directly undermines technology neutrality, placing biofuel producers at a competitive disadvantage despite contributing to the same GHG reduction objectives.

A further inconsistency relates to the treatment of carbon capture and utilisation in biofuel production. Current RED III provisions foresee the phase-out, by 1 January 2036, of the possibility for biofuel producers to account for emission savings from CO₂ capture and replacement (e_{ccr}). This phase-out is unjustified and creates another major distortion. It favours carbon capture and storage (CCS) over carbon utilisation pathways, despite the latter contributing to a circular carbon economy. It risks removing incentives to capture and valorise biogenic CO₂, a valuable renewable carbon source, compared to CO₂ of fossil origin.

Today, renewable ethanol plants are Europe's largest source of high-purity biogenic CO₂— 1.15 million tonnes captured in 2025 alone during fermentation, and it is estimated that up to three times those volumes could already be delivered even without additional capacity expansion. Ensuring that renewable ethanol producers retain the freedom, beyond 2035, to decide how the environmental benefit of this captured CO₂ is used - either counted toward their own emission-reduction performance or transferred to CO₂ purchasers together with the physical molecule - would create a strong incentive to retain and expand domestic biogenic CO₂ production, thus reinforcing sustainability and traceability safeguards fully aligned with EU requirements.

ePURE recommendations

The RED review presents a critical opportunity to correct existing inconsistencies and strengthen the Directive's environmental and economic effectiveness by harmonising GHG accounting methodologies, rewarding locally sourced feedstocks and ensuring fair treatment across renewable fuel types.

- **Revise Annex V to include a standardised and mandatory methodology for accounting transport distances across all biofuels, bioliquids and biomass fuels. Ensure that emissions**

from long-distance transport are fully reflected in GHG calculations. Local and efficient supply chains, with lower emissions profile, should be rewarded.

- **Align the treatment of electricity used in biofuel production with the rules applicable to RFNBOs. Establish clear criteria under which renewable electricity used in biofuel production can be recognised as fully renewable and assigned zero GHG emissions, where equivalent conditions are met.**
- **Remove the 2035 time limitation for accounting emission savings from CO₂ capture and replacement (e_{ccr}) in Annex V and explicitly recognise the role of biogenic CO₂ as a renewable carbon source within the RED framework. The next RED framework should confirm the ability for biofuel producers to account for e_{ccr} indefinitely.**

4. Restoring a level playing field for European renewable ethanol feedstocks

The facts

While the EU applies some of the world's most stringent sustainability criteria to domestic biofuel production, imported biofuels may originate from countries with less ambitious climate commitments and weaker enforcement frameworks. This creates a structural inconsistency with the EU's own climate objectives under the Paris Agreement and risks undermining the environmental integrity of its energy policy.

At the same time, significant distortions of competition persist. Many third countries support their biofuel industries through production and export subsidies, whereas the EU framework primarily incentivises demand. This asymmetry results in an unlevel playing field, where EU producers, despite complying with stricter environmental and traceability standards are placed at a systemic disadvantage. Furthermore, EU producers face much higher labour and energy costs than our non-EU competitors.

EU-produced ethanol must meet robust sustainability requirements across the entire value chain, including strict rules on greenhouse gas savings, land use, biodiversity protection, and traceability. These standards are not always matched by imported products. The result is a clear paradox: more sustainable EU production is effectively penalised, while imports produced under less stringent conditions benefit from access to the EU market.

Serious concerns also remain regarding the traceability and certification of imported biofuels, particularly those classified as "waste-based" or "advanced". Certain feedstock categories such as "intermediate crops" and "damaged crops" present an inherently higher risk of misreporting. Similarly, previously promoted feedstocks like used cooking oil (UCO) and palm oil mill effluent (POME) have proven vulnerable to fraud and misclassification at scale.

These challenges highlight the urgent need for stronger verification systems in third countries and more rigorous enforcement at EU level. As long as such high-risk categories remain eligible under the Renewable Energy Directive, effective oversight will depend on robust control mechanisms, including physical inspections. In this regard, the German implementation of RED III is introducing mandatory on-site audits for advanced biofuels and provides a relevant model that could be replicated at EU level.

In this context, when Union Database for Biofuels (UDB) under Article 31a of the RED proves an efficient tool for tracing biofuels and when it can be extended to raw materials, the full traceability requirements of the UDB—from the point of origin of the biomass—should be primarily applied to imported feedstocks listed under Annex IX, where the risk of fraud and misclassification is significantly higher. Strengthening traceability for these imported feedstocks is essential to ensure the credibility of the system and to prevent irregularities observed in global supply chains.

By contrast, extending the same level of traceability requirements to EU sourced crop-based biofuels feedstocks is neither necessary nor proportionate. The risk of fraud in these supply chains is negligible, as they are largely based on locally produced, well-documented agricultural commodities within the EU, where traceability systems are already robust and effectively enforced. Applying uniform traceability obligations across all feedstocks would therefore create unnecessary administrative burdens without delivering additional environmental or integrity benefits.

Of the 6.82 billion litres of ethanol produced by ePURE Members and other European producers of renewable ethanol in 2024, **49.6% was from corn/maize, 23.4% from wheat, 11.9% from sugars, 5.1% from other cereals and starch-rich crops, and 10% from lignocellulosic, other RED Annex IX-A and other feedstocks.** All the above-mentioned feedstock used to produce renewable ethanol in Europe were also grown in Europe, where no tangible concerns of deforestation risk from sugar and starch crops exist. In fact, this assessment is consistent with the findings of the 2026 Commission's report on the status of production expansion of food crops⁶, which confirmed the absence of meaningful ILUC threats regarding wheat, corn and sugar beet cultivation in Europe.

ePURE recommendations

A credible EU biofuel policy must ensure that sustainability standards, market conditions and control mechanisms are applied consistently and proportionately. It is not about protectionism it is about fair competition and genuine climate integrity in its transport decarbonisation strategy.

- **The EU should significantly reinforce oversight of imported biofuels with a higher risk of fraud and misclassification, particularly in the “advanced” and waste-based categories. Introduce stricter rules for feedstocks such as intermediate crops, damaged crops, UCO and POME, where risks have been clearly identified. Establishing harmonised EU-wide verification requirements, including mandatory on-site audits, ensuring that certification systems are robust, transparent, and enforceable in third countries. For imports, GHG emissions values should generally be determined by actual values in order to prevent fraud and to compensate for the lower frequency and quality of inspections and controls.**
- **While ePURE has expressed strong concerns on the functioning of the UDB and is opposed to its extension to raw materials until it proves to be totally functional, full traceability requirements from the point of origin of imported biomass under the UDB should be targeted, proportionate and risk based. UDB's raw materials traceability requirements should apply first for imported feedstocks listed under Annex IX, where the risk of fraud and double counting is highest. The Commission**

⁶ EU Commission, [‘Report on the status of production expansion of relevant food and feed crops worldwide’](#), January 2026

should reconsider the need for additional traceability requirements for feedstocks produced within the EU, as supply chains are already transparent, localised, and effectively controlled within the EU.

- **Overall, the EU should address structural distortions of competition by ensuring that imported biofuels compete under equivalent economic and regulatory conditions, in line with the Paris Agreement. Introduce measures to address the impact of third-country production and export subsidies, which currently disadvantage EU producers. All imported biofuels should be required to meet standards fully equivalent to those applied within the EU across the entire value chain.**

Conclusion

The post-2030 renewable energy framework must fully recognise the strategic value of sustainable crop-based biofuels as this has been the case in most non-EU countries (USA and Brazil notably). This discrepancy is a massive competitive distortion which not only slows down our defossilisation and energy dependency but also prevents farmers' from generating a much-needed additional revenue.

Evidence clearly shows that biofuels do not compete with food production but rather strengthen food production and sovereignty as shown in the Nova Institute study. Moreover, they deliver significant benefits in terms of rural development and socio-economic growth. At the same time, they enhance energy security and strategic autonomy, a priority in today's volatile geopolitical context that is likely to continue

Achieving real and timely emissions reductions requires immediate, scalable, and cost-effective solutions. Crop-based ethanol, advanced ones and higher ethanol blends are already available and can be deployed across the existing vehicle fleet (the majority of which has an internal combustion engine) without delay as these vehicles will still be on EU roads by at least 2040.

As such, renewable ethanol, as a renewable source of energy should be treated as a central pillar of a diversified energy framework. Recognising and enabling the full contribution of EU-produced ethanol will be essential to ensure a credible, resilient, and effective pathway to transport decarbonisation in Europe.