

EBB

European Biodiesel Board

EBB Position on latest ILUC compromise for 23/05 COREPER

Hasty compromise on doubtful ILUC “science” threatens security of EU fuel and proteins supply



May 21st, 2014

The EBB, representing the voice of the EU biodiesel industry, intends to express its views about the newly proposed compromise on ILUC put forward by the Greek Presidency and to be discussed at the forthcoming COREPER meeting in the afternoon of this Friday May 23rd, 2014.

Our points concerning the more and more doubtful bases and measurements of ILUC “science” are well known and were already put forward in a position that EBB has very recently co-signed with various other organization of the biofuels production chain (such as EOA, Fediol, Coceral, etc.). We would only like to add that since a newly proposed “Whereas” 6.1 recognizes all the increasing and thorough doubts on ILUC “science” we do wonder why and with what consistency ILUC factors or measurements for report have been kept in the Greek compromise proposal from which they should be logically and consistently erased.

Additionally we feel that it is absolutely necessary to raise the attention of EU Member States and national authorities on how much a **hasty ILUC compromise, this Friday, could result, after recent developments, in a number of negative consequences for EU security and independence of energy supply and protein supply** as well as in terms of **lack of national effective control of verifiable flows and volumes of transport fuels and biofuels.**

EU biodiesel provides an indigenous EU renewable energy source which directly improves European energy independency: The current **crisis with Russia** shows how vulnerable the EU is to political turmoil and how dependent the EU is on fossil fuels directly imported from outside the EU, for example in the last years an average of 15 to 17 million tonnes of diesel could not be supplied by our EU refining industry and were imported directly from Russia. This is even more worrying in a context where the EU deficiency in diesel refining capacity is increasing every year (the EU has an increase diesel deficit which is set to reach 50 million tonnes by 2020!). One should realise that a hasty approval of the present ILUC package would probably lead to a loss of several millions of tonnes of EU produced biodiesel that would need to be replaced by a dramatic unreasonable increase in Russian fossil diesel fuels imports.

We are today in a new context and it is time to raise a crucial question on ILUC and independency and security of EU transport, energy and fuel supply: are we really or reasonably ready today, because of unverified ILUC doubts, to replace several millions of renewable EU made biodiesel with fossil based Russian refined imported diesel, exponentially increasing, as a result, the EU transport fuel dependency from Russia? Accessorily we note that such dependence would mainly impact on a strategically crucial sector as diesel for goods transport by lorries and that one month of stop of diesel supply from Russia already today would mean that EU lorries for the transport of goods would be stopped because of diesel penury.

Finally we would like to insist that biodiesel strongly contributes to diminish European long-term deficits in proteins and animal feeding supply (for EU farmers’ autonomous meat and milk production)

As already highlighted, biodiesel is also synonym of EU-made production of food/feed proteins. Also, Europe imports more than 20-25 million tonnes/year of vegetable proteins, most of which from South America. **European biodiesel production balances such deficits and strongly contributes to EU food and feed independence and security of supply.** These EU deficits would be very negatively affected by the reduction of planned support to biodiesel production. This makes biodiesel one of those genuine EU biofuels which should be supported in priority.



The Greek 0,5% compromise on “Advanced Biofuels”: need for clear information on volumes available (or not) and conscious commitment from all national actors

As already stated, although there is little questioning on advanced biofuels’ potential role for the future, a dramatic questioning exists on the today very limited availability of advanced biofuels: the support into the transition to advanced biofuels cannot create, as of today, obligatory commitments that Member States will not have control upon and will most probably be unable to fulfill. Biodiesel from recycled fats is already an important reality, but in the present compromise it seems unwisely kept out of the category of “*advanced biofuels*”. Now: when one thinks for instance to the case of algae, lignocellulosic or other laboratory products, sofar available only in “kilos” scale volumes, where huge investments are going on since a decade and that in all cases this has not delivered a single drop of biofuels (in some cases - like micro-algae - with an omitted very catastrophic GHG balance), one has to be very prudent on future obligations.

Also any certitude on real advanced biofuels availability as of today is disrupted by the damaging problem of frauds in so-called and often self and untrustworthily claimed “advanced biofuels”. Without a clear anti-fraud structuring of an overall EU advanced biofuels register, set to avoid fraudulent or semi-fraudulent declarations on advanced biofuels, it would be very unwise for Member States to commit to any mandatory volumes, whose nature and reliability of declaration is today completely out of control. In this context, and before the above points will be clarified a reliable compromise on a legally defined 0,5% sub target seems sofar quite hard to reach.

On top of frauds how can a serious 0,5% target or an anti-fraud scheme be defined if EU harmonised criteria for at least starting to define advanced biofuels are not clearly established?

A harmonized definition of advanced biofuels should be based on the criteria highlighted by a definition similar to the one given by the European Sustainable Biofuels Forum (ESBF), i.e.:

Complementary criteria to qualify as advanced biofuels:

- (1) *Having low carbon dioxide emission or high GHG reduction*
- (2) *High sustainability*
- (3) *Ligno-cellulosic biomass, municipal or industrial waste, sludge, residue streams or process by-products, macro-algae, aquatic plants, micro-organisms*

In this context UCOME and TME are to be fully considered as advanced biofuels

Used Cooking Oils and tallow based biodiesel have exceptional GHG and sustainability performances and are exclusively produced from waste and residues. These products are today the main if not the only advanced biofuels available in Europe in a large scale and there would be no justification to exclude them from the advanced biofuels list.

No quadruple counting – prudence is needed on waste hierarchy

Triple, quadruple counting or beyond are excessive. They will have unknown impact on the entire biofuels sector and on investments, still creating huge market distortions and especially risking to be perceived by the public opinion as an accounting trick used to shrink actual targets. Also, any use of waste hierarchy must not reduce the availability of wastes and residues for biofuels. If this was to happen all effort would be vain and investment in waste and residues biofuels will disappear.

A sub-target for renewable electricity (especially in rail) would be an unacceptable policy deviation

EBB strongly opposes the definition of a sub-target for advanced biofuels that includes renewable electricity in transport and/or, especially, in rail. The use of electricity in rail has been widely developed in last century and rewarding it nowadays would be a seedy attempt to find a pretext to cut the biofuels targets, while giving an ex-post incentive to last century old (or even obsolete!) technologies. It is not useless to remind that contrary to biofuels, electricity is an energy carrier and not an energy source and that the share of renewable electricity in transport could never be measured if cars are charged (as normal) from plugs.