

Re: EBB specific recommendations for the ENVI Committee vote on post-2020 EU Renewable Energy Directive (RED II)

To: Rapporteurs and Shadow Rapporteurs
Members of the ENVI Committee
Substitutes of the ENVI Committee

CC: ENVI Committee Policy Advisors

Honourable Member of the European Parliament,

On behalf of the **EBB-European Biodiesel Board**, and in addition to the voting recommendations sent earlier today by the EU Biofuels Chain, we are contacting you ahead of next Monday's vote on the draft Opinion of the ENVI Committee on the post-2020 Renewable Energy Directive (RED II) with additional specific EBB recommendations on key amendments crucial for us.

1. Rejecting the inclusion of ILUC into the sustainability criteria for biofuels. ILUC factors should continue being limited only to reporting obligations and not be subject to accounting: there is no existing consensus on the ILUC science in the international scientific community and the ILUC should be considered as a carbon investment that is amortised over time, encouraging hence the maintenance of the current level of biodiesel production in the EU.

Moreover, to address any potential ILUC concerns related to crop-based biofuels, the 2015 ILUC Directive already addresses the issue by setting a 7% cap.

- To reject this inclusion, we ask you to reject **AMs 590, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 959.**

2. Eliminating (or increasing) the 1.7% cap on Part B of Annex IX to avoid arbitrary picking of 'winners' among waste and residue feedstocks. Such an approach would also be consistent with the Commission's proposal, which recognises savings of as much as 90% of GHG emissions for biofuels made from waste and residues. Indeed, the proposal provides a supportive framework for the use of waste and residues in biofuels in several ways.

In addition, any concerns with fraud or other trade issues should be addressed individually, namely by setting-up a strong EU-wide traceability system for all biofuels. As mentioned above, advanced and non-advanced biofuels should be submitted to an EU-wide traceability verification (9) to avoid untrustworthy claims for extra incentives.

- To correct this mistake, we would support **AMs 614, 615, 617, 619,** (eliminating this cap) or, in the worst-case scenario, **AM 622** (which increases it);

3. Including a conceptual definition of advanced biofuels. This definition should promote diversified advanced biofuel technologies and a broad raw material base which is not restricted to Annex IX feedstocks. This approach avoids the arbitrary listing of feedstocks which can be considered as advanced. This is crucial to ensure a meaningful contribution of waste and residue feedstock-based biofuels towards the reduction of GHG emissions in transport, as well as to give long term visibility to stakeholders, to promote diversified advanced biofuels technologies and to allow investments into new technologies.

- To include this definition, we ask you to support **AMs 327, 329, 908;**

Moreover, and as already stated by the EU Biofuels Chain, we strongly reinforce the importance of **rejecting all compromise amendments proposed by the Rapporteur**. These compromises fail to include an ambitious renewables incorporation in transport fuels to which sustainable European crop-based biofuels could contribute.

The proposed compromises also maintain an unjustified phase-out of conventional biofuels thereby neglecting the benefits of European crop-based biofuels in co-producing valuable protein meal. All these elements are crucial to ensure policy continuity after 2020 and to guarantee that renewables continue being used in liquid fuels for transport.

Thanks in advance for your time and consideration.

Your faithfully,

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The **European Biodiesel Board (EBB)** is a non-profit organisation established in January 1997. Today, EBB gathers close to 70 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.