



BI(15)1350:1/DDJ/mb

Brussels, 17<sup>th</sup> February 2015

To: Members of the European Parliament's Committee on the Environment, Food Safety and Public Health

Re: Amending Directives 2009/28/EC and 98/70/EC – draft report by Nils Torvalds

Dear Honourable Member of the European Parliament,

The European biofuels chain, represented by Copa-Cogeca, Coceral, Fediol, EBB and EOA, would like to express its opinion on the compromise suggestions relating to Mr Torvalds' draft report on biofuels and ILUC, which are currently being discussed by the Committee on the Environment, Food Safety and Public Health.

We would like to see the following principles taken into account in view of achieving a compromise on the matter:

1. Biofuels produced from certified sustainable arable crops offer a cost-efficient solution to decarbonise the transport sector, improve energy security in the EU, reduce the EU's protein deficit and stabilise the situation on agricultural markets. Any cap that is lower than 8% and includes dedicated energy crops would be detrimental to the aforementioned points.
2. A stable and targeted decarbonisation policy to support biofuels, including certified sustainable biofuels made from arable crops, is needed for the post 2020 period. This would enable European agriculture and its related industries to fully contribute to the EU's ambitious climate and energy policies, and to innovation, growth and jobs in rural areas.
3. The concept of indirect land use change (ILUC) should not be enshrined in legislative provisions whilst there is no sound and consensual scientific basis at international level on which to analyse the amplitude of this theoretical phenomenon. Thus, estimated values for ILUC factors must be deleted from both directives. Moreover, this

phenomenon is neither measurable nor observable in reality. If ILUC were to be introduced however, existing investments must be protected by a grandfather clause on ILUC for biofuels corresponding to the volumes produced before the revision of both directives enters into force. This is not currently the case in the Council's common position and in the compromise amendments from the Committee on the Environment.

4. A separate target for advanced biofuels of more than 0.5% is paramount. It must be binding and be part of longer perspectives that go beyond 2020 in order to create a stable framework to enable investments and foster the sector's commercial development in paralleled to biofuels made from arable crops.

Yours sincerely,



Pekka Pesonen  
Copa-Cogeca Secretary General

Gloria Gabellini  
COCERAL Deputy  
Secretary General

Nathalie Lecocq  
Fediol Director General



Raffaello Garofalo  
EBB Secretary General



Philippe Dusser  
EOA Secretary General