

EBB position for RED II triologue negotiations



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Following the adoption of the European Parliament's position and the Council's general approach on the post-2020 EU Renewable Energy Directive (RED II), the EU institutions will now engage in informal tripartite meetings – triologue – to aim at getting an agreement on a text acceptable to the Council, the European Parliament and the European Commission.

Coupled with the complete EBB position paper on the RED II, issued in April 2017, this position paper conveys to the EU institutions involved in the upcoming negotiations the main **EBB policy asks for a successful RED II:**

- 1. The most ambitious levels for the uptake of renewable energy in Europe should be set for 2021 to 2030.** The EBB therefore endorses the proposed minimum for renewables in **transport of 14%**, coupled with the more ambitious **35% for renewables overall**. The level of renewables in transport in 2021 should be no less than 10%, in line with the required level under RED, and have a linear trajectory to 14% in 2030. The transport mandate of 14% should be a minimum target with no option for Member States to lower this number.
- 2. The 7% maximum contribution of crop-based biofuels in transport should be maintained to demonstrate respect for industry investments and policy consistency.** This cap is the result of a compromise between EU institutions following three years of intense policy debates, culminating in the ILUC Directive in 2015. This Directive is still being implemented, and already addresses concerns over the alleged impact of the EU's biofuels policy on the availability of biomass and risk of ILUC emissions. As such, **any proposals for crop differentiation or ILUC-based differentiation are no required and should be abandoned.**
- 3. A progressive and realistic deployment of alternative fuels should be based on the key principles of feedstock and technology neutrality.** In the frame of more ambitious targets for renewables in transport, **any discriminatory moves should be avoided while taking positive action to incentivise advanced biofuels or, when appropriate, specific market segment or transport sectors.**
- 4. Reject setting disproportionately high multiplier factors for alternative energy sources.** Multipliers may be used by Member States only as an option and if necessary. They should not be used to excessive levels: Any multipliers over 2 x would artificially reduce the ambition of the EU renewables targets and should be discarded.

In accordance with the principles set out above, electricity in rail should not be rewarded with any multiplier as the continued use of existing technology would not lead to any real uptake of new volumes of renewable electricity in trains.

5. Sustainability and feedstock origin should be verified on a case-by-case basis. **Full traceability of all raw materials is essential** to ensure that the European industry only uses sustainable feedstocks to produce its renewable energy. To this end, **the establishment of a single EU-wide traceability database by the EU Commission should be confirmed**. This was introduced by both the European Parliament and the Council and would avoid any concerns with potential fraudulent situations and eliminate any concerns about sustainability of biofuels and their raw materials
6. **Maintain the existing system of mass balance** by rejecting the Parliament proposal to mandate each individual consignment of raw materials to meet the requirements laid down in Article 26. This proposal would increase costs of production and reduce GHG savings without benefits as to the sustainable nature of the raw material and the intermediate products used, increasing the risk of disruption and leading to inefficiencies in the processing stages. Full traceability via a single database is the right solution to guarantee the transparency of biofuels trade and the origination of raw materials.
7. **In order to incentivise continued research of novel wastes and residues into biofuels, support a broader definition of advanced biofuels** which includes, besides feedstocks in Annex IX, other biofuels produced from waste and residual biomass not originating from food/feed crops and complying with the existing sustainability criteria.
8. **Eliminate the cap of 1.7% for Part B of Annex IX**. This approach is also consistent with the Commission's proposal, which recognises savings of as much as 90% of GHG emissions for biofuels made from waste and residues. Any concerns with fraud or other trade issues should be addressed individually, namely by setting-up the abovementioned EU-wide traceability system for all biofuels. Waste based biofuels are to be encouraged and cannot be logically capped.
9. **Reject the possibility of Member States to set higher greenhouse gas emissions savings thresholds for biofuels**, which would fragment the EU internal market and create different requirements in different EU Member States.

About the EBB:

The European Biodiesel Board (EBB) is a non-profit organisation established in 1997. Today, the 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. The 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. The EBB is constantly working towards the development of improved and greener technologies.