

EBB position on the revision of the EU bioeconomy strategy

Since the beginning of the current EU political mandate, the European Commission has identified¹ bioeconomy as one of the pillars of its main multi-annual political priority: strengthening the EU economy's competitiveness.

The renewed EU bioeconomy strategy is expected to unleash the full potential of this sector, by **addressing – as the Commission's "call for evidence" underlines – "the various barriers that hinder or slow down the development of bioeconomy solutions: lacking cost competitiveness, a non-level playing field in the single market with fossil resources, complex regulatory hurdles, inconsistent legislation and implementation across the EU, insufficient funding associated to high-risk investment needs and gaps in financing and insufficient infrastructure"**.

Such aspects are **all part of long-standing policy asks of the EU Bioeconomy Alliance (EUBA), of which the European Biodiesel Board (EBB)² is a full member**. Therefore, EBB strongly endorses the EUBA's response to the public consultation and – more generally – **position on the renewed EU Bioeconomy strategy**, which aims to provide concrete regulatory solutions to the abovementioned existing barriers. In particular, the EUBA's position underlines the need for internal regulatory consistency in bioeconomy-related policies (including specifically biofuels-related ones).

Additionally, EBB would like to underline two points expected to be dealt with in the coming strategy, **more directly related to the EU biofuel sector: biomass use prioritisation and sustainability criteria**.

Concerning biomass use prioritization, we expect the strategy to recognize the crucial role of biorefineries to pursue the EU environmental and climate, as well as energy independency and industrial competitiveness goals, and the strong interdependence between different biomass uses. In doing so, the European Commission should propose **actions that focus on enhancing synergies among different biomass uses** (food, feed, energy and industrial uses), **the efficient use of sustainable biomass** as well as its integration across related supply chains, further promoting the use of waste and by-products. This will help further the goals of the Bioeconomy strategy and uphold the competitiveness of the European sector.

The demand for sustainable biobased feedstock will continue to grow as various industrial sectors shift towards bio-based production, and the world population keeps growing. Ensuring widespread availability and accessibility of bio-based feedstocks should be a key priority for EU and national policy-makers, taking into account existing EU targets and the specific needs of each sector, as well as existing and potential/prospective synergies. Biorefineries producing biomass-derived energy and products (food, feed, chemicals and other materials) are recognized for their crucial role in transforming industrial value chains to align with Europe's environmental and climate goals. Moreover, biorefineries are able to drive economic growth generating direct, indirect, and induced jobs and supporting multiple objectives of the UN Agenda for Sustainable Development 2030.

Moreover, a study commissioned by DG AGRI has explicitly recognized that **domestic biodiesel production is a key driver for the production of biomass for food and feed uses (protein meals)³**. Conversely, restricting the market for non-food biomass uses (in particular: vegetable oil for biodiesel

¹ [A competitiveness compass for the EU](#); [2025 Commission work programme](#); [A vision for agriculture and food](#).

² Representing the EU biodiesel production sector (FAME and HVO, produced from all kinds of feedstocks).

³ [Evaluation support study on feeding strategies to diversify the protein sources used in different livestock production systems in the EU](#), page 95 in particular, published in May 2024.

production) may reduce the biomass production for food and feed uses. Other enablers – such as technical rules for certification of newly-added Annex IX⁴ feedstocks – can further drive towards greater synergies among the bioenergy and agriculture sectors.

In order for the EU bioeconomy to grow to its fullest potential, a variety of policy enablers will be key. It is also essential to establish a comprehensive set of levers to support research, innovation and technological development, the creation of synergies between different sectors and the optimization of the overall value chain in a long-term perspective.

More generally, a multitude of criteria, such as local economics, regional differences and specialisations, societal needs, or the existence of viable alternatives, must be considered to assess the most sustainable and efficient way to use biomass. **The realities of the bioeconomy are too complex and diverse to apply a rigid, transversal and indiscriminate hierarchisation of biomass uses:** therefore, freedom for biomass suppliers and processors to determine to whom they sell their raw material, biomass-derived products and ingredients must be ensured.

The **other side of the same coin is the need to harmonise sustainability criteria for all biomass uses.** In other words: as there should not be any pre-determined rigid prioritization in biomass uses, what eventually matters is simply to make sure that biomass is sourced sustainably, regardless of its final use. This, in turn, would facilitate an informed consumer's / user's choice, and would more generally increase the level of transparency throughout the biomass supply chain.

In particular, **the land use and biodiversity sustainability criteria applied to biofuels and bioenergy in the consolidated art. 29 (2-7) of the Renewable Energy Directive (RED) should be the starting point for such a harmonisation effort:** they have been in place for more than a decade, and have proven to be effective – including through progressive revisions over time – in making sure that biomass for biofuels and bioenergy is sustainably sourced. Additionally, **minimum GHG emission reduction targets** to be applied to different biomass uses should take into account the specificities of each of such uses.

Of course, simply setting the criteria has never been enough for biofuels and bioenergy: this would not be the case for other sub-sectors within the EU Bioeconomy, either. Therefore, the same level of scrutiny, and similar certification and verification rules applied to biofuels and bioenergy should eventually also be applied throughout the biomass supply chain, regardless of the final expected biomass use.

We remain fully available, should you have any questions on the points raised in this paper.

The European Biodiesel Board (EBB) is a non-profit organisation established in January 1997. Today, the EBB gathers 34 members across 21 Member-States, which represents around 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 and renewable diesel (FAME and HVO) 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.

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⁴ Of the Renewable Energy Directive