



Brussels, 22 November 2017

To: COREPER I Committee of Permanent Representatives

Dear Madam/Sir,

We are contacting you on behalf of the EU Biofuels Chain to provide our views ahead of the discussion on the RED II Council Presidency compromise proposal (*ST 8697 2017 REV 4*) in COREPER I on 24 November 2017, focusing on selected key points.

Renewable energy in transport obligation

- The Biofuels Chain supports the articulated orientation of the Presidency's text when it comes to fostering the uptake of renewable energy in the transport sector, through an increased overall blending obligation of at least 12% by 2030. In line with the impact assessment supporting the proposed 2030 Energy and Climate policy framework, this obligation should be increased to at least 15% by 2030.
- The requirement to maintain a baseline of renewable energy share post-2020 is also encouraging and could even be extended to renewables in transport. This would ensure that this challenging sector to decarbonise keeps using biofuels that are necessary to meet the EU's 2030 energy and climate ambitions.

Treatment of biofuels

- Maintaining a stable policy framework for biofuels is key to restore investors' confidence and allow existing operations to run. Therefore, we welcome the Presidency's maintaining of a maximum 7% contribution of crop-based biofuels until 2030 in the EU RES-T target.
- Advanced biofuels must be established as an additional instrument to further reduce fossil fuel use, and not as a replacement of crop based biofuels, and be supported by a dedicated sub-target.

Multiple counting: Similarly, we encourage Member States to consider removing multipliers of renewable electricity in road and rail which would merely artificially inflate the uptake of renewables, benefiting first and foremost the use of fossil energy sources.

Best regards,

Nathalie Lecocq - FEDIOL Secretary General

Raffaello Garofalo - EBB Secretary General

Emmanuel Desplechin - ePURE Secretary General

Teresa Babuscio - COCERAL Secretary General

Philippe Dusser - EOA Secretary General

Elisabeth Lacoste - C.I.B.E. Director

Céline Duroc - CEPM Permanent Delegate

Pekka Pesonen - Copa and Cogeca Secretary General

FEDIOL is the European Association representing the vegetable oils and protein meal industry. The sector covers more than 180 facilities belonging to 35 companies in 17 countries and employs directly 20,000 people. Its members process oilseeds, refine and bottle vegetable oils.

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.

The **European renewable ethanol association (ePURE)** represents the interests of European renewable ethanol producers to the European institutions, industry stakeholders, the media, academia and the general public. The organisation, established in 2010, promotes the beneficial uses of ethanol throughout Europe. Based in Brussels, ePURE represents 42 member companies, with 50 production plants in 16 member states, accounting for about 85% of the installed renewable ethanol capacity in Europe.

COCERAL is the European association of trade in cereals, rice, feedstuffs oilseeds, olive oil, oils and fats and agrosupply. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the above mentioned agricultural products. COCERAL's full members are 21 national associations in 15 countries and 1 European association [Unistock]. With about 3500 companies as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. COCERAL has 1 associated member in Switzerland and 2 European Associations (EUROMALT and EUROMAISIRS). Gafta is an extraordinary member of COCERAL.

Founded in 2002, the **European Oilseed Alliance (EOA)** brings together the oilseed producing organizations from the main European countries (Germany, France, UK, Poland, Czech Republic, Finland and Belgium) and represents 90% of European oilseed production.

The **C.I.B.E.** is the international confederation of sugar beet growers. It represents the interests of beet growers vis-à-vis European Institutions and international organisations since 1927. CIBE is composed of national and regional associations from 18 European beet-producing countries. These include 140,000 growers from 16 EU countries (Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, the Netherlands, Poland, Romania, the Slovak Republic, Sweden, the United Kingdom) and roughly 130,000 growers from 2 non-EU countries (Turkey and Switzerland).

CEPM brings together Professional and inter-Professional organisations whose mission is to represent and defend in their respective countries the interests of all or part of the maize chain: corn, maize silage, maize seed and sweet corn. To fulfil these objectives, CEPM carries out monitoring, lobbying and communication activities, and makes concrete proposals.

Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 23 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states. Together, they are one of the biggest and most active lobbying organisations in Brussels.