Brussels, 7 December 2017

Subject: Biofuels Chain views on Council RED II compromise proposal

Honourable Minister,
Dear Madam/Sir,


On behalf of the EU Biofuels Chain, we are contacting you to provide our views and to stress some important aspects which should be considered carefully when formulating your final position.

While the EU Biofuels Chain supports the direction of the Presidency’s proposal for an overall incorporation of renewable energy in transport of at least 12% by 2030, we call upon the Council to increase this ambition to at least 15%. This is in line with the Commission’s own RED II impact assessment, and this requirement should include crop-based biofuels, the main contributor to today’s decarbonisation in the transport sector.

The EU’s renewable energy in transport target led to €16 billion of investments that generated 220,000 jobs. Conventional biofuels resulted in some 35Mt of gross avoided CO₂ emissions (in 2013) and contributed to a 116 Mtoe drop in EU demand for imported fossil fuels, corresponding to €30 billion savings per year. Biofuels have improved food security through the availability of feed co-products and have shown not to have any significant effects on global agricultural prices, nor to restrict the supply of food products. Therefore, we welcome the Presidency’s proposal to maintain a 7% contribution of crop-based biofuels until 2030 in the EU RES-T target.

In addition, the deployment of advanced biofuels should build on the existing industry so as to secure investor confidence, which is a prerequisite for any new investment in renewable fuels projects. Advanced biofuels shall not be considered as a replacement for conventional biofuels, but as an additional instrument to further reduce fossil fuel use and GHG emissions, and be supported by a dedicated sub-target.

Similarly, we encourage Member States to remove electricity multipliers for road and rail. These will not benefit renewable electricity, but only artificially inflate the uptake of renewables, benefiting first and foremost the use of fossil energy sources.

We would like to thank you in advance for your time and consideration.

Yours faithfully,

Philippe Dusser
EOA Secretary General

Nathalie Lecocq
FEDIOL Secretary-General

Emmanuel Desplechin
ePURE Secretary General

Raffaello Garofalo
EBB Secretary General

Pekka Pesonen
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Céline Duroc
CEPM Permanent Delegate

Dr. Teresa BABUSCIO
Secretary General
The EU Biofuels chain includes:

**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 EUROMAISIERS). 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, Sweden, 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.