

EBTP Position on the Rapporteur's amendments to the review of the RED and FQD

As the 2nd reading of the RED and FQD review progresses through the European Parliament, the European Biofuels Technology Platform has reflected on the rapporteur's amendments and calls on EU decision makers to:

- **Develop a scientifically sound, long-term vision and a stable framework for the European advanced biofuels industries after 2020;**
- **Reach a clear decision on ILUC that supports advanced biofuels and puts an end to the regulatory uncertainty that has affected the sector since 2009.**

The long-term vision for advanced biofuels industrialisation needs to be based on the existing conventional biofuels industry where technical, operational and financial synergies exist with advanced innovative pathways. In this respect, it is advisable to maintain a healthy sustainable **conventional biofuels** industry that facilitates the transition to advanced biofuels.

Double or multiple counting measures should be applied exclusively for advanced biofuels that are both low-carbon and produced by innovative pathways. These measures must be accompanied **by binding sub-targets** for such advanced biofuels. The EBTP considers that innovative pathways are based on technologies with a high implementation potential and high well-to-wheel energy efficiency, but also elevated upfront development and demonstration costs, since they are still at demonstration scale. For upscaling, consistent efforts and investments are essential. When a technology matures, multiple counting should be phased out in a smooth transition allowing the learning curve and economies of scale to be built upon. Product quality should be more clearly emphasized; the final fuel(s) have to meet necessary standards and vehicle manufacturers' requirements.

Dedicated energy crops¹ should remain in the list of eligible feedstocks for advanced biofuels production, as they provide best land-use efficiency, can be grown on marginal or degraded land and are able to create additional income for farmers without competing with food. They should not be capped.

The ongoing discussion about **ILUC factors** needs to be settled based on consistent, scientifically sound evidence and respective indicators as it creates uncertainties across the whole biofuels sector. It is also important to notice that indirect land use changes are not specific to biofuels but apply to all sectors sourcing primary biogenic raw materials.

For all regulatory measures to be adopted, the following constraints and principles should be considered:

- Ensure security for investments through an implementable and stable policy framework;
- Reflect that conventional biofuels will still represent the overwhelming majority of biofuels available by 2020 and therefore ensure their sustainable production;
- Take into account the singularity of the European fuel market in terms of diesel/gasoline demand, and the needs of emerging markets such as aviation and shipping in order to make biofuel policy effectively contribute to the security of energy supply alongside the future European bioeconomy;
- Be scientifically based, provide simple indicators which are relevant to the climate and ecology of the respective feedstocks, without geographic discrimination of feedstock
- Provide consistent fossil fuel emission values to allow comparisons with emissions from biofuels;

¹ An energy crop is a plant grown as a low-cost and low-maintenance harvest used to make biofuels, such as bioethanol, or combusted for its energy content to generate electricity or heat. Energy crops are generally categorized as woody or herbaceous plants

- Foster land use optimisation;
- Pave the way for innovation;
- Be WTO compatible.

About the European Biofuels Technology Platform

The European Biofuels Technology Platform (EBTP) was established in 2006 to contribute to the development of cost-competitive world-class biofuels technologies and accelerate the deployment of sustainable biofuels in the European Union, allowing the development of a healthy biofuels industry, through a process of guidance, prioritisation and promotion of research, development and demonstration activities.

It brings together the knowledge and expertise of stakeholders active across all biofuels value chains: biomass resource providers, biofuels and bioenergy producers, technology vendors, fuel distributors, aviation, marine & road transport, research and technology organisations, as well as academia, finance, government organisations and NGOs. It is managed by a Steering Committee and supported by a Secretariat, the European Commission being an active observer.

Further information about EBTP activities and updates on RTD and industrialisation of advanced biofuel technology in Europe is available at <http://www.biofuelstp.eu>

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