

POSITION OF THE EUROPEAN OILSEED ALLIANCE (EOA) ON THE RENEWABLE ENERGY DIRECTIVE PROPOSAL (RED II)

The EU Commission proposal of 30th November 2016 to revise the Renewable Energy Directive (RED II) foresees:

- The deletion of the 10% target for renewables in transport;
- Its replacement with a new target of 6.8% exclusively directed to low-emission and advanced biofuels in 2030 – the crop-based biofuels from the 1st generation not being accounted for in this target;
- A phasing down of crop-based biofuels through a digressive cap reaching 3.8% in 2030.

The RED II proposal ignores the benefits of EU first generation biofuels and threatens EU energy and protein independence

- Biodiesel is the most commonly used EU biofuel representing 2/3 of the total EU biofuel production. **Rapeseed is the major feedstock for biodiesel:** EU rapeseed oil represents 60% of EU biodiesel feedstock, and 2/3 of EU rapeseed oil is used in biodiesel.
- Historically, the EU production of rapeseed for biodiesel was developed on mandatory set-aside land, and since 2003 the EU Directives for the promotion of the use of energy from renewable sources (2003/30/EC and 2009/28/EC) introduced **support policies through blending targets for biofuels, with the aim of supporting the EU agricultural sector, enhancing the EU's energy independence, and reducing GHG emissions.**
- **The EU rapeseed production doubled between 2006 and 2012 in response of the Directive and increasing biodiesel demand** – thanks to billions of euros of investments. Today, the production is stable and the European biofuel industry accounts for 220,000 permanent jobs.
- **Rapeseed biodiesel significantly contributes to the EU protein supply.** Rapeseed is composed of 60% of protein meal and 40% of vegetable oil. The increased supply of protein linked to rapeseed biodiesel helped to control **the EU protein deficit which nevertheless is still of 70%. Non-GM protein co-produced from 1st generation biofuels currently represent 20% of the EU consumption and reduces the import of soybean meal**
- **The cultivation of rapeseed brings real environmental benefits:** rapeseed is a break crop, grown to interrupt the repeated sowing of cereals in crop rotation, thus stopping the disease cycles and reducing the use of pesticides and treatments. Contributing to the biodiversity, rapeseed is linked to bee pollination to the point that in arable production zones, honey production can depend on oilseed flowers up to 35-40%.
- Farmers' revenues in many EU regions depend on rapeseed, which represents a key element for the resilience of the agricultural sector.
- **The decision to reduce the contribution of and to end all support for first generation biofuels would lead to a dramatic drop of rapeseed cultivation areas.**

There is **no other alternative for the rapeseed oil** used as feedstock for biodiesel production: the EU market for human consumption has been stable for 20 years, and exports would have to compete against the low priced palm oil on the world market. Surplus of rapeseed oil will lead to lower prices and result in rapeseed areas going back to pre-2004 levels, threatening protein supply, farmers' revenues and the overall rural economy. Moreover, rapeseed biodiesel is the front-runner concerning the implementation of sustainability requirements, certification systems

and the promotion of projects for the optimisation of the GHG-balance in cropping systems with rapeseed.

OUR CLAIMS:

▪ **Setting high ambitions for the decarbonisation of transport in Europe**

The EU cannot back down from the 10% target renewable energy in transport set by the 2009 Renewable Energy Directive. It is necessary to ensure a stable legislative framework and continuity of support including for crop-based biofuels until 2030, allowing for the phasing in of advanced biofuels. Crop-based biofuels are currently the only significant contribution to decarbonisation, as long as advanced biofuels are not widely available.

In views of these considerations, we recommend to introduce a European binding target of 15% of renewable energy in the transport sector by 2030.

▪ **Allowing a preferential support to crop-based biofuels contributing to the EU protein independence**

The compromise reached in 2015 on a 7% cap must remain unchanged until 2030, and biofuels providing protein and high-quality feed co-products should be given a preference.

It is essential that policy makers acknowledge the role of biofuels made from European feedstocks for the EU's protein independence, by:

- Maintaining the current cap of 7% conventional biofuels in the energy mix in transport up to 2030;
- Allowing incentive under and beyond this cap for biofuels that provide proteins and high-value feed co-products.

▪ **Acknowledging the origin of CO2 emissions reductions**

1) **Making a difference between European vegetable oils and palm oil**

Between 70% and 80% of biodiesel produced in Europe come from other feedstocks than palm (rapeseed oil, used cooking oil and animal fats, sunflower oil). These EU feedstocks do not lead to deforestation nor do they compete with food production.

The EU should take better account of the reality of CO2 emissions from palm oil production, by adjusting the scale laid down in Annex VIII Part A and differentiating between rapeseed and sunflower crops on the one hand and palm oil crops on the other.

2) **Restoring the truth about fossil fuels' CO2 emissions:**

Setting the fossil fuel comparator at 94 gCO₂eq/MJ does not adequately reflect the reality of fossil fuels' greenhouse gas emissions. A 2014 study from environmental consultancy Ecofys¹ showed that biofuels replace highly polluting fuels on the market and that the fossil comparator should therefore be set at 115 gCO₂eq/MJ.

It is essential that the fossil comparator be adjusted in accordance with the latest studies available (at least 115 gCO₂eq/MJ), in order to reflect the real performance of biofuels compared to fossil fuels.

¹ Ecofys, [Greenhouse gas impact of marginal fossil fuel use](#), November 2014