

FEDIOL position on RED II trilogue negotiations

Ahead of trilogue negotiations on the EU Renewable Energy Directive proposal for the post-2020 period, FEDIOL – representing the European vegetable oil and protein meal industry – would like to reiterate the sector's priorities for an ambitious policy framework for renewables in transport by calling on the three institutions to:

- **Set a minimum 35% renewable energy share by 2030**, in line with what has been proposed by the European Parliament and as confirmed by the International Renewable Energy Agency (IRENA) in its recent findings which certify the feasibility of raising the renewable share in the energy mix to at least 34%.
- **Maintain the highest possible target for renewables in transport (at least 14%)**, ensuring a binding trajectory which builds on the 2020 target of 10% for each Member State.
- **Ensure a stable policy framework for existing and future investments by maintaining the 7% share for crop-based biofuels until 2030**: this would be an important signal recognising the crucial role played by conventional biofuels in the decarbonisation of the EU energy mix and in helping the EU food and feed outlet through the co-production of high-value proteins for animal feed, as the EU still has a 75% dependency rate on imported proteins. In that sense, the possibility for Member States to reduce their renewable energy target in transport if the cap on crop-based biofuels is equally reduced should be deleted. This approach is highly concerning as it might lead to internal market disruption and reduced investors' confidence.
- **Substantially decrease or eliminate proposed multipliers and set a credible target for advanced feedstocks in Annex IX**: multipliers constitute an artificial boost towards meeting decarbonisation objectives in transport and would severely reduce the ambition in the renewable sector at the benefit of fossil fuels. Similarly, excessively high incorporation targets for advanced low-carbon fuels would not be met without the contribution of conventional biofuels.
- **Avoid any differentiation among feedstocks based on alleged different levels of ILUC in response to claims of adverse effects from biofuel production**: there is no existing consensus on the ILUC concept in the international scientific community, therefore no reason to rely on those values to set a differentiation among biofuels feedstocks.
- **Avoid imposing the use of segregation instead of mass balance as chain of custody**: segregating the raw material and the intermediate products in dedicated streams - silos, conveyors and production chains - would increase the risk of disruption and essentially lead to inefficiencies in both the supply and the processing stages, reducing GHG savings without benefits as to the sustainable nature of the raw material and the intermediate products used.

FEDIOL represents the interests of the **European vegetable oil and protein meal industry**. With over 180 facilities in Europe, the sector provides over 20.000 direct employments. Our members process approximately 55 million tonnes of basic products a year for the food and non-food markets. Oilseed crushing produces vegetable oils and protein meals as co-products. While vegetable oils are used for food and technical uses (pharmaceuticals, paints, detergents, biodiesel, etc.), protein meals are used to meet the increasing global demand for meat and protein.