

15.02.2021

(21) PR 6

FEFAC position on the Revision of the Renewable Energy Directive

FEFAC, the European association representing Industrial Compound Feed and Premix manufacturers, acknowledges the strategic importance of the review and possible revision of the Renewable Energy Directive II in view of the EU Green Deal goal to become the first climate-neutral continent by 2050¹.

We understand that with recently increased EU ambitions to cut GHG emissions by at least 55% by 2030² compared to 1990 levels, the EU aims to further increase energy efficiency and the share of renewable energy (from the current 32%³ by 2030 to 38-40%).

The EU compound feed industry, the largest economic actor in the bioeconomy by volume⁴, would like to stress, however, that the envisaged EU scenario of increasing targets for the use of biofuels relying on food and feed crops will need to accelerate the shift towards advanced biofuels produced from industrial waste streams and biomass waste.

We consider the current 7% of food & feed crops contributing to renewable energy production is a good compromise in balancing respective sector responsibilities and competition between the food and energy sector usage. Otherwise, the EU risk jeopardizing the functioning of the Single Market and the resilience and sustainability of the EU food & feed sector.

FEFAC would, therefore, recommend particular attention to the following issues in the upcoming review of the Renewable Energy Directive II:

- a. Strengthening and proper enforcement of the established eligibility criteria under articles 28 & 29 (especially the waste hierarchy and sustainability criteria) in order to prevent that several high value feedstuffs (i.e. co-products) traditionally used as feed (listed in the EU Feed Materials catalogue⁵) are listed as potential advanced biofuels, only based on the fact that they cannot be identified as a feed crop but wastes/residues suitable for production of advanced biofuels.
- b. Clarify the fact that the Commission may amend the list of feedstock set out in parts A and B of Annex IX but not to remove them. The facility to remove a feedstock may be necessary because of previously inconsistent evaluation (e.g. inclusion of molasses in Annex IX in 2017) or because of scientific and technical progress i.e. finding better use for raw material than for biofuel production (e.g. algae usage in animal feed). In view of the strategic EU ambition to increase EU sufficiency, such feedstocks (e.g. Distillers Dried Grains Solubles, DDGS) should not be wasted for energy usage.
- c. Provide legal certainty for the feed sector which may face the prospect of losing important feedstocks when revising Annex IX every two years.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1576150542719&uri=COM%3A2019%3A640%3AFIN>

² https://ec.europa.eu/clima/policies/eu-climate-action/2030_ctp_en

³ <https://ec.europa.eu/jrc/en/jec/renewable-energy-recast-2030-red-ii>

⁴ https://fefac.eu/wp-content/uploads/2020/07/05362_co-products_brochure_003-1.pdf

⁵ <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32013R0068>

The EU Compound feed industry uses approximately 20 mt. of co-products from the EU food industry, converting human inedible materials offering a high nutritional value for animal feeding purposes into valuable foodstuffs. This reuse of co-products:

- reduces GHG emission of feed production
- contributes to circular economy
- strengthen the EU's strive to increase its self-sufficiency in feed protein production
- reduces nutrient leakage by increasing nutrient efficiency
- prevents food losses from occurring
- contributes to food security and increased resilience of the EU feed and food chain