

(CAB-VON DER LEYEN)

Subject: FW: Avril Group Urgent Request regarding Taxonomy

From: [REDACTED] <[REDACTED]@hkstrategies.com>

Sent: Wednesday, April 14, 2021 10:07 AM

To: [REDACTED] (CAB-VON DER LEYEN) <[REDACTED]@ec.europa.eu>; [REDACTED] (CAB-VON DER LEYEN) <[REDACTED]@ec.europa.eu>

Cc: [REDACTED] <[REDACTED]@hkstrategies.com>

Subject: Avril Group Urgent Request regarding Taxonomy

Dear [REDACTED],
Dear [REDACTED],

I am contacting you on behalf of the Avril Group, a French agro-industrial group specialising in human nutrition, animal nutrition, renewable chemistry, and renewable energy, about the urgent matter that is the EU Taxonomy.

Avril is very concerned about the current draft of the delegated act of the Taxonomy which he believes is **legally questionable and unjustifiable**.

First of all, the draft delegated act is incoherent and legally questionable. While it provides for an express reference to the sustainability criteria of the Renewable Energy Directive (2018 / 2001 - RED2), strengthening them on the reduction of CO2 emissions (65% vs. 50%), the draft automatically excludes first-generation biofuels ("Food-and feed crops are not used in the activity for the manufacture of biofuels for use in transport") even if the latter meets the aforementioned criteria. This has been corrected in the latest version of the act concerning oleo chemistry but remains for first-generation biofuels.

Secondly, the draft delegated act is unjustified:

- On the one hand, it would call into question the investment strategy of the agricultural sector, which actively participates in the development of renewable energies in the Union, provides many jobs in rural areas and contributes to the EU's energy and protein independence.
- On the other hand, sustainable biofuels play a driving role in decarbonising transport. In fact, first-generation biofuels now account for 45% of renewable energies used in transport in the EU28 and saved about 46 million tonnes of CO2 in 2018. The industrial maturity of these biofuels contrasts with the still limited development in advanced biofuels. It is the achievement of European renewable energy objectives in 2030 that will be called into question.

In this regard, we kindly wanted to ask you to **remove the sentence "Food-and feed crops are not used in the activity for the manufacture of biofuels for use in transport" from the final version of the text** (in Annex I of the Delegated Act under point 4.13) in order ensure better compliance between the two texts and protect the industry.

We would also be happy to discuss this matter with you at your earliest convenience.

Thank you in advance for your support,

Kind regards

[REDACTED]
On behalf of the Avril Group

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