

**From:** SAGREDO FERNANDEZ Miguel Angel (CAB-ARIAS CAÑETE)  
**Sent:** Wednesday 16 November 2016 13:10  
**To:** CAB ARIAS CANETE ARCHIVES  
**Cc:** [REDACTED] (CAB-ARIAS CAÑETE)  
**Subject:** FW: Concern about definition of "advanced biofuels" in RED Recast proposal

[Please register - gracias](#)

**From:** Ilkka J Rasanen [REDACTED]  
**Sent:** Wednesday, November 16, 2016 10:03 AM  
**To:** SAGREDO FERNANDEZ Miguel Angel (CAB-ARIAS CAÑETE)  
**Cc:** [REDACTED]  
**Subject:** Concern about definition of "advanced biofuels" in RED Recast proposal

Dear Miguel,

It was good to talk to you again after many, many years.

As I mentioned, as the world's largest high-quality renewable diesel producer, Neste is very concerned about the the definition of "advanced biofuels" in the draft of the RED recast proposal. It is now based on the so called Annex IX list of raw materials of the so-called ILUC Directive, and therefore excludes some waste and residue raw materials that Neste has used for years.

We believe this definition would severely limit the volumes of available advanced biofuels and therefore will prevent any meaningful contribution of advanced biofuels to the decarbonisation of transport by 2030. This could also exclude raw materials of some EU refiners which are looking to transform their fossil oil refineries into renewable fuel production. In addition to lack of availability, there is no doubt that a narrow list of raw materials will result in high prices for these raw materials, and consequently, high prices for biofuels.

There is an alternative, broader definition of advanced biofuels, which was prepared by an expert working group this year under the chairmanship of DG ENER. This working group, the so-called Sub-Group on Advanced Biofuels (SGAB) under the Sustainable Transport Forum, was a joint initiative of DG MOVE and DG ENER and was composed of 34 experts from across stakeholder groups, nominated by the European Commission. The definition of advanced biofuels proposed by the SGAB is as follows:

*"Advanced Biofuels are those produced from biomass<sup>1</sup> other than food crops while meeting the EU sustainability regime<sup>2</sup> under the legislation in force<sup>3</sup>."*

footnotes:

<sup>1</sup> Biomass as defined under RED or any amendment to it.

<sup>2</sup> Sustainability regime as defined under EU Legislation

<sup>3</sup> Existing legislation in force at the time of consideration.

Furthermore, the SGAB definition is consistent with existing EU State Aid rules; Both the “block exemption regulation” (EU 651/2014) and the State Aid Guidelines on State aid for environmental protection and energy 2014-2020, (2014/C 200/01) make a distinction between “food-based” and “advanced biofuels”. And “food-based” biofuels is defined in Article 2, paragraph 113, as biofuel produced from cereal and other starch rich crops, sugars and oil crops as defined in the ILUC Directive).

Thanks, Miguel, for considering this and for an opportunity to talk.

I copy [REDACTED], our [REDACTED], to this message.

Best regards,

Ilkka

--

Ilkka Räsänen  
Director, Public Affairs  
Neste

[REDACTED]

[www.neste.com](http://www.neste.com)

---

This e-mail and any further e-mails from the Nestle Corporation or any of its employees, directors or other representatives, including any file(s) transmitted with such messages ("message") may be confidential and intended solely for the entity or individual to whom it is addressed or to whom the sender intended to address it. If you are not the intended recipient of this or any following message, please contact the sender immediately upon receipt of the message and delete the message from your system without reproducing, distributing or retaining copies thereof or using or disclosing the information contained therein. Thank you.

Due to the insecure nature of this medium, this or any following message may have been altered without the knowledge of sender. The sender will therefore not be liable for the message if modified.