

**From:** [REDACTED] (CAB-DOMBROVSKIS)  
**Sent:** jeudi 22 octobre 2020 11:26  
**To:** [REDACTED]  
**Cc:** CAB DOMBROVSKIS CONTACT; [REDACTED] (CAB-DOMBROVSKIS)  
**Subject:** RE: ePURE's concerns on draft delegated act on taxonomy - eligibility criteria for biofuels and biogas in transport

Dear [REDACTED]

Many thanks for your message. I take note of your position on this issue.

Please note that the Commission is currently finalising the draft delegated act, which will be published for public feedback in the next weeks, before adoption by the Commission.

I am also forwarding your message to the cabinet of Commissioner McGuinness.

Best wishes,

[REDACTED]  
[REDACTED] Executive Vice-President Valdis DOMBROVSKIS



**European Commission**  
An Economy that Works for People

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[https://ec.europa.eu/commission/commissioners/2019-2024/dombrovskis\\_en](https://ec.europa.eu/commission/commissioners/2019-2024/dombrovskis_en)

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The views expressed in this e-mail are my own and may not, under any circumstances, be interpreted as stating an official position of the European Commission.

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**From:** [REDACTED]  
**Sent:** Thursday, October 22, 2020 11:00 AM  
**To:** CAB DOMBROVSKIS CONTACT <[CAB-DOMBROVSKIS-CONTACT@ec.europa.eu](mailto:CAB-DOMBROVSKIS-CONTACT@ec.europa.eu)>; [REDACTED] (CAB-DOMBROVSKIS) [REDACTED]  
**Subject:** ePURE's concerns on draft delegated act on taxonomy - eligibility criteria for biofuels and biogas in transport  
**Importance:** High

Dear [REDACTED]

I am writing to you on behalf of [ePURE](#), the association representing the European renewable ethanol producers, in the context of the preparation of a Delegated Act pursuant to the **Taxonomy Regulation**, and specifically the criteria for biofuels and biogas in transport.

We understand that the delegated act under consideration would not only tighten the sustainability criteria that have been agreed in the Renewable Energy Directive II (2018/2001), hereafter 'RED II', and that are in the process of being implemented across Member States, but also restrict the eligibility to the sole advanced biofuels defined in RED II Art. 2.

Against this background, ePURE wishes to highlight the following concerns:

- The proposed eligibility criteria are based on the TEG final report that has misinterpreted the sustainability criteria of biofuel in RED II and made the erroneous conclusion that only advanced biofuels are supported by RED II.
  - Discriminating between crop-based and advanced biofuels is not justified according to RED II. The phase-out of policy support for crop-based biofuels in transport has been rejected by the co-legislators, first in the 'ILUC Directive' 2015/1513 and more recently in RED II.
  - On the contrary, the co-legislators have renewed their support to all sustainable forms of biofuels:
    - Sustainable biofuels, both crop-based and advanced ones, can count towards the obligation put on fuel suppliers to provide at least 14% of renewable energy in the transport sector by 2030;
    - The contribution of crop-based biofuels shall be no more than one percentage point higher than their 2020 share, with a 7% maximum;
    - RED II limits the phase-out of support to 'high-ILUC risk' biofuels, as defined in the Commission Delegated Regulation on high and low ILUC-risk biofuels (i.e. palm oil biofuels);
    - Advanced biofuels, defined as those made from Annex IX-A feedstock, are subject to a dedicated ramping-up sub-target, reaching 3.5% of the energy in transport by 2030. They enjoy an extra level of support.
- It would be inconsistent to have the RED II legislation defining and supporting sustainable biofuels (including crop-based ones) and the sustainable finance policy defining other sustainability metrics for the sole advanced biofuels and excluding the same biofuels that are supported under RED II.
- The TEG final report itself has pointed out that other types of biofuels that are not advanced biofuels may offer substantial climate mitigation benefits and that the new Platform for Sustainable Finance will undertake further work to consider establishing criteria for ensuring substantial contribution to climate mitigation. The draft Delegated Act, if it were to exclude other biofuels than advanced biofuels would go against the TEG final report and would annihilate the future work of the Platform for Sustainable Finance.

We therefore believe that it is premature for the draft delegated act to set eligibility criteria that are more restrictive than the sustainability criteria defined under RED II, and it would be adequate to await for the Platform Sustainable Finance to work on eligibility criteria for other types of biofuels that are not advanced biofuels but offer substantial climate mitigation benefits, as is the case of European renewable ethanol.

We thank you for your consideration and remain available to exchange with your services on this matter.

Best regards,

[REDACTED]

ePURE - European renewable ethanol

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Looking for answers about renewable ethanol? Visit our websites [E10info.eu](http://E10info.eu) and [ethanolfacts.eu](http://ethanolfacts.eu)



