



Joint position of the bioenergy industries and value chain on the draft **Taxonomy Delegated Act**

We (the Bioenergy industries and value chain) have expressed strong concerns since the beginning of the elaboration process of the Technical Screening Criteria TSC for bioenergy (feedstock and manufacturing). These concerns mainly focused on what we considered a lack of transparency and stakeholder inclusiveness. Lack of transparency especially, regarding the Technical Expert Group – TEG elaborating the TSC. Lack of stakeholder inclusiveness because no one of our industries has had representatives neither in the Technical Expert Group nor in the Sustainable Finance Platform.

Unfortunately, our concerns were substantiated and indeed from the first version submitted to public consultation in early 2019 to the draft delegated act to the final TEG's recommendations for the delegated act currently in interservice consultation, the criteria proposed have remained unchanged and often in contradiction to the RED II criteria adopted and, which gathered widespread support from co-legislators and civil society.

We understand and support the principle that the EU taxonomy should not contradict the European Green Deal objectives to fully deliver on the increased EU climate ambition. However, we consider that the final TEG's recommendation for the delegated act, which ignores its methodology and metrics, cannot be considered as building upon RED II and merely going beyond. On the contrary, if inspired by the TEG report, the delegated act requirements would end up determining essential elements, which should be subject to a legislative act (as established by art. 290 TFEU). Furthermore, by moving away from the bioenergy sustainability framework and introducing brand new provisions with no consultation or proper impact assessment (i.e., excluding feedstocks such as crop-based biofuels and animal fats, minimising use of "whole trees, and ignoring RED II provisions on the establishment of a "solid tracking methodology" for used cooking oil) the delegated act would completely discard the compromises elaborated on RED II.

The European Commission itself acknowledges that the way the RED II should be adapted or not to the new ambition of the European Green Deal needs to be assessed in an open process with stakeholders and co-legislators hence the Commission Work Programme for 2021 and the inception consultation on the revision of RED II. We regret that the elaboration process of a piece of legislation on such a crucial and complex matter is restricted to a few services of the Commission without providing real opportunity for the stakeholders to be heard.

Consequently, we urge the Commission to align sustainability requirements for the bioenergy sector to those established in the Renewable Energy Directive.

The co-signatories are committed to working with EU policymakers to ensure that EU taxonomy is contributing to the European Green Deal objectives and a decision-making process more open and transparent.

About Bioenergy Europe

Bioenergy Europe is the voice of European bioenergy. It aims to develop a sustainable bioenergy market based on fair business conditions. Founded in 1990, Bioenergy Europe is a non-profit, Brussels-based international organisation bringing together more than 40 associations and 110 companies, as well as academia and research institutes from across Europe.

About EBA

EBA advocates for recognition of biomethane and other renewable gases as sustainable, on demand and flexible energy sources that provide multiple knocks on socio-economic and environmental benefits. Supported by its members, EBA is committed to work with European institutions, industry, agricultural partners, NGOs and academia to develop policies which can enable the large-scale deployment of renewable gases and organic fertilisers throughout Europe.

About EBB

The European Biodiesel Board (EBB) is a non-profit organisation established in January 1997. Today, EBB gathers close to 60 members across 21 Member-States, which represents 75% of the European output. Biodiesel is the main European solution to reduce emissions from transport and dependence on imported oil. EBB aims to promote the use of biodiesel in the European Union and is committed to fulfil International standards for sustainability in GHG emissions and sustainable feedstock. EBB is constantly working towards the development of improved and greener technologies.

About ePURE

The European renewable ethanol association (ePURE) represents the interests of European renewable ethanol producers to the European institutions, industry stakeholders, the media, academia, and the general public. The organisation, established in 2010, promotes the beneficial uses of ethanol throughout Europe. Based in Brussels, ePURE speaks for 36 member companies and associations (including 19 producers), with around 50 production plants in 16 member states, accounting for about 85% of the renewable ethanol production in Europe.

About EWABA

EWABA is the voice of the EU waste-based biodiesel industry. Our members collect and use feedstocks such as used cooking oil, animal fats and other wastes and residues to produce sustainable biofuels with the highest GHG savings (up to +90%) when compared with fossil fuels. In 2019 our +30 members produced more than 1.7 millions of waste-based biodiesel, representing a reduction of more than a million tons of CO₂ emissions from polluting the atmosphere. This is equivalent to taking more than 550 thousand cars off the EU roads.