

The revision of the Renewable Energy Directive (RED II)

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Conferência APPB:

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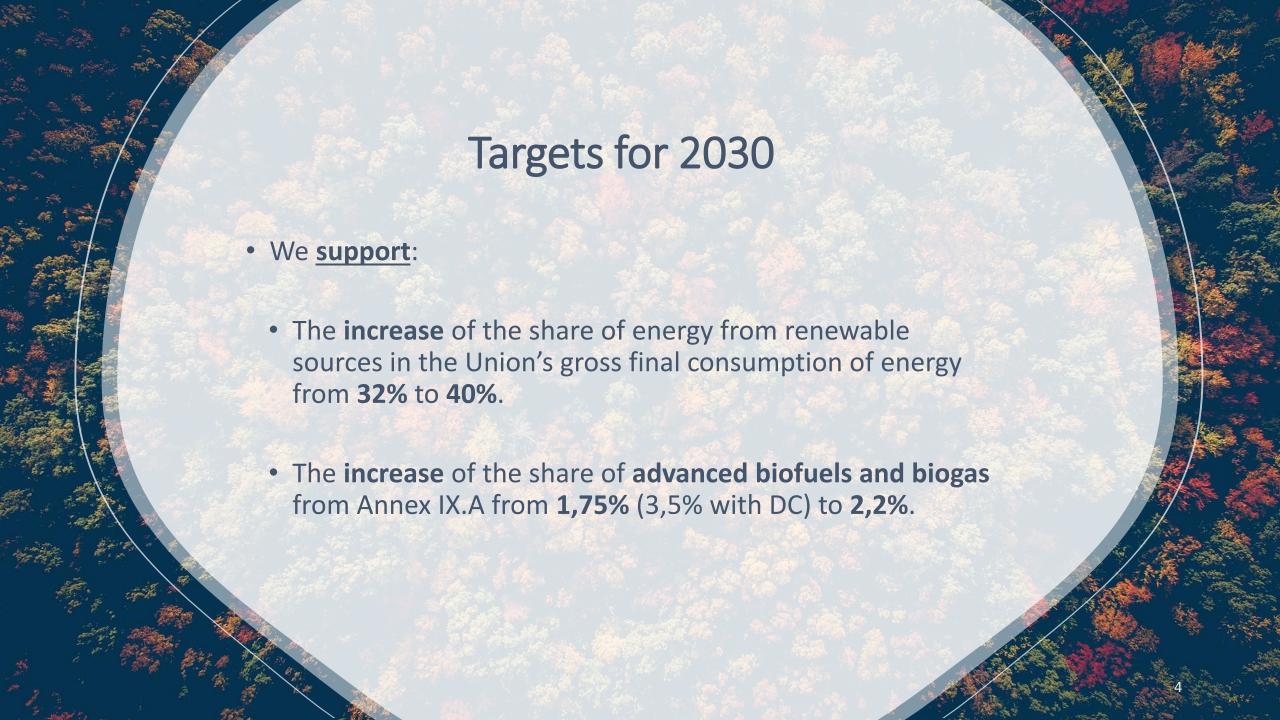












Type and value of the global target in transport sector

Current target

Renewable energy in transport

→ **14**% in 2030

New proposed target

Greenhouse gas (GHG) emissions intensity reduction

→ **13**% in 2030

- We would prefer to <u>keep</u> the current model of energy-based targets.
 - → At least the **possibility** for MS to use it should be **maintained**.
- We <u>support</u> the increase of the GHG target to the **20**% proposed by the ITRE rapporteur of the EP.

Real vs accountable targets

- We <u>fully support</u> the following proposals:
 - The expansion of the denominator to include all the fuels used in all transport modes.
 - The removal of the multipliers for Annex IX biofuels (x2) and for renewable electricity supplied to electric vehicles (x4) and trains (x1,5).
- In consistency, the multiplier for certain fuels for aviation and maritime transport (x1,2) should also be removed.

Limits of biofuels from food and feed crops

Biofuels from food and feed crops

→ Limit 2021-2030 = market share in 2020 in each MS, with the possibility of +1%

→ With a maximum of 7%

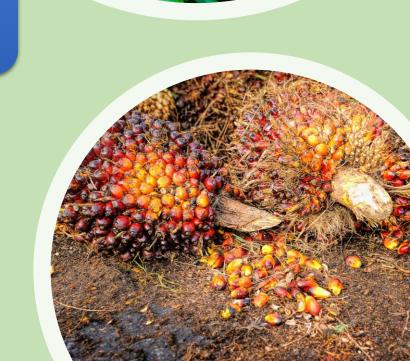
Biofuels from food and feed crops with high indirect land use change (ILUC) risk (palm)

→ Limit 2022-2023 = market share in 2019 in each MS (3.1% in Spain)

→ Gradually decrease to 0% in 2030

• The generic limit for food and feed crops **should be increased to at least 7%** in all MS.

• When the Regulation on deforestation-free products is approved, ILUC will disappear → limits will no longer have any justification.



Limit of biofuels from Annex IX.B

The 1,7% limit for biofuels from raw materials in Annex IX.B (UCO and animal fats category 1 and 2) should be removed as there is no solid justification for it.

Risk of fraud → measures should be adopted for all the raw materials (e.g., the Union database).

 If the limit is maintained, the possibility for MS to request the Commission to exceed it should be kept.







- All biofuels should comply with the same sustainability and GHG emissions savings criteria and rules established in the RED II, including those incentivized through the Regulations on maritime transport (FuelEU Maritime) and on aviation (ReFuelEU).
- The <u>same</u> biofuels should be <u>eligible</u> for compliance with the objectives set out in the Directive and the FuelEU Maritime and ReFuelEU Regulations.

GHG emissions of biofuels

- The proposed modifications to the calculation methodology should be <u>rejected</u> and the following should be <u>maintained</u>:
 - The possibility of using typical GHG values for NUTS 2 or more disaggregated areas.
 - The accounting for emissions savings due to the capture and substitution of CO₂.
 - The consideration of zero GHG emissions up to the process of collection for all the residues not included in Annex IX.





GHG emissions of renewable electricity in transport

- The <u>calculation methodology should be the</u> <u>same</u> as for renewable fuels:
 - The **GHG emissions of renewable electricity** should be considered.
 - The fossil fuel comparator (183 gCO_{2eq}/MJ) should be replaced by the GHG emissions intensity from the non-renewable electricity mix (92 gCO_{2eq}/MJ in 2020 in Spain).



GHG credits from renewable electricity in public charging stations

- We <u>reject</u> the proposal to allow economic operators that supply renewable electricity to electric vehicles to <u>receive</u> and <u>sell</u> <u>credits</u> of GHG emissions saving to meet transport targets.
- This would seriously undermine the current biofuels obligations and the necessary substitution of fossil fuels with biofuels.



Diesel and petrol specifications (FQD)

- We <u>support</u> the increase of the maximum limit of **FAME** in diesel fuel from **7**% (B7) to **10**% (B10) and keeping B7 as protection grade.
- This requirement **should be accompanied** with:
 - The obligation to progressively commercialize
 B10 and E10.
 - The allowance for MS to place on the market diesel blends > B10 and petrol blends > E10.

Thank you for your attention!

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