



The revision of the Renewable Energy Directive (RED II)

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Index

- APPA Biocarburantes
- Targets for 2030
- Type and value of the global target in transport sector
- Real vs accountable targets
- Limits of biofuels from food and feed crops
- Limit of biofuels from Annex IX.B
- Union database
- Consistency between the RED II and other Regulations
- GHG emissions of biofuels
- GHG emissions of renewable electricity in transport
- GHG credits from renewable electricity in public charging stations
- Diesel and petrol specifications (FQD)

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Targets for 2030

- We support:
 - The **increase** of the share of energy from renewable sources in the Union's gross final consumption of energy from **32% to 40%**.
 - The **increase** of the share of **advanced biofuels and biogas** from Annex IX.A from **1,75%** (3,5% with DC) to **2,2%**.



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



Real vs accountable targets

- We **fully support** 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**.





Union database

- We support the development of the **Union database** to enable the tracing of liquid and gaseous renewable fuels and recycled carbon fuels.
- The possibility that MS can create **national databases** linked to the EU one should be kept.

Consistency between the RED II and other Regulations

- 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 same biofuels should be eligible 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 rejected** and the following should be **maintained**:
 - 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 calculation methodology should be the same 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 **reject** the proposal to allow economic operators that supply renewable electricity to electric vehicles to **receive and sell credits 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 support 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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