



EUBA Statement on Revised draft Delegated Act on climate-related objectives

DESPITE IMPROVEMENT, MORE CHANGES ARE NEEDED TO ALLOW EUROPEAN BIOECONOMY TO BE PART OF THE SOLUTION TOWARDS CLIMATE NEUTRALITY

The activities of the members of the European Bioeconomy Alliance (EUBA) together represent nearly €2 trillion providing more than 22 million jobs to EU citizens. Our activities are essential to the sustainable production of renewable resources and their conversion into food, feed, fibres, materials, chemicals, pharmaceuticals and bioenergy through efficient processes and/or innovative technologies.

A cornerstone of the bioeconomy are biorefineries that use biomass, by- and co- products, residues and waste instead of fossil resources as their raw material. In the bioeconomy, land use and food security are optimised through a sustainable, resource-efficient and largely waste-free utilisation of Europe's renewable raw materials, thereby contributing significantly to a circular economy.

The bioeconomy offers huge potential for tackling societal challenges such as resource efficiency and climate change by enhancing European sustainability and value creation. It plays an important role in boosting Europe's competitiveness by revitalising rural areas, thus providing growth and jobs over the coming decades. The vision of the EUBA is for a competitive, innovative, energy secure and sustainable Europe: leading the transition towards a post-petroleum society while decoupling economic growth from resource depletion and environmental impact.

The EUBA takes note of the revised draft Delegated Act on climate-related objectives that was presented to the Member States' Expert Group on Sustainable Finance on 24 March. While we recognise that the revised Delegated Act's Annex I has made improvements in certain activities¹, we consider that further modifications are still needed to fully enable EU bioeconomy supply chains and their outlets to contribute successfully towards climate change mitigation and adaptation and ultimately towards the EU's goal of climate neutrality. These modifications are needed because the Delegated Act still fails to recognise existing sustainable practices under the Renewable Energy Directive as sustainable.

With regards to the manufacturing of bio-based chemicals and of plastics in primary form, we welcome the fact that "food or feed crops" are no longer excluded for use in some industrial/renewable material applications. However, we still have some major concerns:

- 1. Broadening the Renewable Energy Directive's sustainability criteria:** whereas for biofuels the Renewable Energy Directive establishes a clear regulatory framework and methodology for making comparisons to fossil-based fuels, for plastics and organic basic chemicals no such regulatory framework or methodology exists.
- 2. The new reference to a 27% greenhouse gas emissions' reduction threshold:** there is no clarity on the origin of this reference and on the methodology behind the foreseen products' comparison. This provision risks being unimplementable for a wide range of bioeconomy products, since the chemical composition of bio-based products is often very different and incomparable with fossil

¹ European Bioeconomy Alliance reply to the Commission consultation on the draft Delegated Act of November 2020 and further letter sent to the European Commission are available [here](#).



carbon-based products in order to introduce new and novel properties in the end-products.

- 3. Food and feed crops in energy applications:** the current draft still excludes food and feed crops for use as biofuels for transport and biowaste, mentioning that a key criterion is that “food or feed crops are not used as bio-based feedstock for the manufacture” of these bio-based products and ingredients. This exclusion should be eliminated, as is proposed for plastics and organic basic chemicals.
- 4. Forest biomass:** the criteria included in REDII under the risk-based approach take into account the fundamentals of forest biomass sustainability such as legality, regeneration, nature protection, soil and biodiversity maintenance and forests’ long-term production capacity. Therefore, it is considered essential, specifically for forests, to have REDII as the key reference for taxonomy to ensuring the sustainability of forest biomass.

We believe that if the sustainability of EU feedstock is not taken into consideration, the Delegated Act and sustainable finance implications would deliver a deeply contradictory message to the EU’s primary producers, processors and to all associated bio-based industries. They would undermine confidence and investment within this sector and would be in direct contradiction to recommendations set out in the EU’s Bioeconomy Strategy, Circular Economy Action Plan and Horizon Europe’s strategic research and innovation Plan. They would also undermine the EU’s better regulation agenda and the ability to deliver on its own ambitious climate objectives, particularly in the field of circularity of materials, fuels, feed, food and of renewability in general.

Our members are committed to the EU Green Deal objectives together with the development of the bioeconomy in Europe, provided that a framework to ensure a fair, predictable and coherent basis for business to operate is guaranteed.

We respectfully ask Member States and the European Commission to consider the above concerns and stand ready to contribute with our expertise to find workable solutions towards a more renewable and less fossil-carbon dependent Europe through a Just Transition which leaves no one behind.



European
Bioeconomy
Alliance

ABOUT EUROPEAN BIOECONOMY ALLIANCE

The European Bioeconomy Alliance (EUBA) is an **alliance of leading European organisations** representing sectors active in the bioeconomy – agriculture, forestry, biotechnology, sugar, starch, vegetable oils, pulp and paper, bioplastics, renewable ethanol, and research & innovation.

MEMBERS OF THE EUROPEAN BIOECONOMY ALLIANCE



BIC
Bio-based Industries Consortium



CEFS
European Association
of Sugar Producers



CEPF
Confederation of European
Forest Owners



Cepi
Confederation of European
Paper Industries



COPA-COGECA
European Farmers and
European Agri-Cooperatives



ePURE
European Renewable Ethanol
Producers Association



EUBP
European Bioplastics



EuropaBio
The European Association
for Bioindustries



FEDIOL
The EU Vegetable Oil &
Proteinmeal Industry



FTP
Forest-based Sector
Technology Platform



PFP
Primary Food Processors



Starch Europe
European Starch Industry
Association