The revision of the Renewable Energy Directive (RED II)

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"Biocombustíveis na Transição energética"

Lisboa, 28 abril 2022

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Targets for 2030

- We **<u>support</u>**:
  - 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 <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 CO_2**.
  - 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 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 **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 **<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 **<u>should be accompanied</u>** 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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