

EBB
European Biodiesel Board



ePURE
european renewable ethanol



copa*cogeca
european farmers european agri-cooperatives

Brussels, 15th October 2013

To the Ambassadors, members of Coreper I

Subject: ILUC file – Biofuels supply chain position on early second reading proceedings

Dear Ambassador,
Dear Attaché

We are writing to you on behalf of the associations representing the **biofuel supply chain in Europe**, namely the European Biodiesel Board (EBB), the European Oilseeds Alliance (EOA), the EE Vegetable Oil and Protein Meal Industry (FEDIOL), and the European renewable ethanol industry (ePURE), the European Farmers and Agri-cooperatives (Copa-Cogeca) and the European traders in grains and oilseeds (COCERAL).

While regulatory certainty is very important, the European supply chain would like to recall that **any change to the current legislative framework requires solid and verifiable scientific evidence** to modify the Renewable Energy and Fuel Quality Directives, which were both adopted only four years ago. Uncertainties to assess indirect land-use change (ILUC factor) still remain as this assessment can only be based on theoretical models: even the authors of the study used by the European Commission when preparing its proposal call for caution when relying on current theoretical models.

The European Parliament's rapporteur Ms Lepage argues that an overwhelming majority of industry stakeholders want "*a quick result*" and calls in for industry certainty as main argument to open negotiations, despite not having consulted with us. The European biofuels supply chain strongly believes that **the European Parliament and the EU Council should make no hasty decisions** on changing the legislation currently applicable because of time pressure and the willingness to close the file before the May 2014 elections. The proposed ILUC legislation represents a u-turn of the EU biofuels policy, with major implications on our industries and the EU domestic supply on proteins and beet pulps to feed animals. **Sufficient time for a healthy debate is necessary** before reaching definitive conclusions.

We therefore call on you to **reject the request for starting early second reading negotiations**, thus ensuring that EU Institutions would reach a coherent and balanced text with an ordinary second reading

We thank you for taking our position into account and remain available should you wish to discuss it further.

With our best regards,

Raffaello Garofalo
EBB Secretary General



Philippe Dusser
EOA Secretary General



Nathalie Lecoq
FEDIOL Director General



Rob Vierhout
Secretary General ePURE



Teresa Babuscio
Secretary General COCERAL



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Secretary General Copa-Cogeca

