



European Parliament
Attn: Tiemo Wölken MEP
Rue Wiertz 60
Brussels 1047

Brussels Monday, 06 February 2023

Dear Mr Wölken,

Re: the revision of Annex VI to the Renewable Energy Directive

On behalf of CEFS, the European Association of Sugar Manufacturers, CIBE, the International Confederation of European Beet Growers, and EFFAT, the European Federation of Food, Agriculture & Tourism Trade Unions, we are writing to you to underline our principled position on the revision of the Renewable Energy Directive.

Specifically: the zero-rating of life-cycle greenhouse gas emissions up to the point of collection of non-Annex IX residues and wastes that are fit for use in the food or feed market (Annex VI – part B – point 18 – 3rd subparagraph).¹

This is a technical question but of crucial importance to the decarbonisation of beet sugar production in Europe.

Although it is today mainly used for animal feed, beet pulp is a residue when used for energetic purposes. It is produced unavoidably as part of the sugar production process.

With the implementation of energy efficiency improvements, beet pulp can provide more than 100% of the energy needs of an EU beet sugar factory. We estimate that between 50 and 70% of beet pulp would be required in many such cases. In this way, beet pulp could replace the use of fossil fuels while guaranteeing future supplies to the animal feed market.

Unfortunately, the European Commission's proposal would end the zero-rating of life-cycle greenhouse gas emissions up to the point of collection of residues such as beet pulp. It would make it impossible to meet the sustainability criteria under Art. 29(10) that determine whether an energy source is renewable. Because for ETS installations the emissions of biomass fuels that do not meet the RED sustainability requirements must be covered by emissions allowances, the Commission's proposal would make the energetic self-use of beet pulp economically unviable. Given that the rural location of many beet sugar factories makes full electrification impossible, this would close the door on decarbonisation for many factories and plunge their future into doubt.

¹ The point of collection means the point at which the beet pulp becomes available for further processing for bioenergy. It is within the sugar factory confines.

It makes no sense to allocate upstream emissions to residues, since residues are produced unavoidably and are not the primary driver of a decision to cultivate and process an agricultural raw material.

We welcome that a compromise agreement has been reached on equivalent wording in Annex V – part C – point 18 – 3rd subpara (covering biofuels and bioliquids – point 621). We ask that the same wording be used for the future compromise agreement for biomass fuels in Annex VI – par B – point 18 – 3rd subpara (point 630).

We call on you to support the position of the European Parliament on point 630, which would maintain the status quo and continue the zero-rating of life-cycle greenhouse gas emissions up to the point of collection of beet pulp when used for bioenergy.

We understand that discussions are moving quickly and that compromises are being sought. Nevertheless, we would like to emphasise that the wording of Annex VI – part B – point 18 – 3rd subparagraph is no mere detail but would represent a serious threat for the economic sustainability of a whole sector with expected negative repercussions also on thousands of jobs across Europe.

On behalf of all beet growers, beet sugar manufacturers, and workers of the sector in the EU, we urge you to take on board our warning and considerations.

We are at your disposal to exchange further on this topic should you so wish.

Yours Sincerely,

[E-SIGNED]

Marie-Christine Ribera
Director General, CEFS

[E-SIGNED]

Elisabeth Lacoste
Director, CIBE

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Kristjan Bragason
General Secretary, EFFAT