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PRESS RELEASE

EWABA members have successfully completed the 2nd UDB pilot

The European Waste-based & Advanced Biofuels Association (EWABA) has been advocating for a proper and timely launch of the Union Database for Biofuels (UDB) to contribute to sustainability and traceability of EU biofuels in order to prevent fraudulent imports. EWABA members are well advanced in testing the UDB environment with the 2nd technical pilot involving biodiesel producers and waste collectors completed.

EWABA confirmed that **all key UDB transactions — from point of origin to final consumption — can be successfully recorded**. No significant technical bugs were found, and the system is functional and will improve over time. Questions remain on whether the UDB should require strict enforcement of the GHG lifecycle calculations or this should be the responsibility of Voluntary Scheme auditors.

EWABA members also recommended several areas for improvement to support adoption and user experience. Our most common request from testers was for improved documentation and training. The main barrier to UDB implementation is a coordinated mandatory deadline for use by all global raw material suppliers and demand for UDB POS from customers.

In order to prevent continued fraudulent imports from 3rd countries, the UDB system should become mandatory and the European Commission and Member States shall set a firm deadline for the obligatory use of the UDB. Without binding milestones, the system will not be adopted effectively in the international supply chain. Prolonging UDB deployment accepts that fraud will continue to be invisible and immune from prosecution, especially in 3rd countries where EU regulators have limited jurisdiction, while **legitimate waste and advanced biofuel producers in Europe are forced to close operations due to unfair competition**.

While some Member States urge caution, the **Commission has restated that the UDB is functional and that full traceability depends on making UDB use mandatory**. EWABA supports a **phased approach, beginning with raw material producers and limited to liquid biofuels**, as listed below:

Phase 1: All certified companies are required to onboard, train, and record at least quantity and raw material descriptions in the UDB. Minor mistakes (e.g. late POS uploads or accidental errors) are tolerated and should not lead to certificate suspension. Serious fraud (e.g. intentional mislabelling or inflating volumes) triggers audits and if upheld, suspension. Stakeholders provide objective feedback and identify areas for improvement.

Phase 2: Full UDB compliance is audited like current paper systems and Member States can use UDB POS for national EU RED reporting.

The European Commission should coordinate a work programme which includes monitor onboarding rates and agreeing a roadmap for continuous improvement of the UDB. **Deadlines should first apply to full liquid biofuel supply chains** where the UDB is mature, while UDB pathways for gas, RFNBO, SAF, and marine fuels are still being tested. Integration of some national databases should not delay broader UDB adoption. UDB scope must include the raw material supply chain to prevent creation of fake volumes in the database.

EWABA remains committed to supporting the testing, onboarding of international suppliers and continuous improvement of the UDB over time. However, EWABA urges the Commission to **publish a clear implementation plan — endorsed by Member States and all voluntary schemes — and communicate it to every certified company** as soon as possible. Regulators require the UDB to effectively curb international fraud cases. Industry requires certainty. The fight against fraud cannot wait.

A few words on the UDB:

Directive (EU) 2018/2001 - REDII (Art 28.2) introduced the concept of a Union Database (UDB), to enable the tracing of liquid and gaseous transport fuels that are eligible for being counted towards the RED targets. Each Economic Operator (EO) along the entire supply chain will have to register all transactions of all relevant feedstocks, intermediate products and fuels, which can only occur between entities on the database. Registration under the UDB should be compulsory for all EOs from 1 January 2024 according to the European Commission.

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About EWABA

EWABA is a Brussels-based association representing the interests of the European waste-based and advanced biofuels industry before EU institutions, national governments, industry, civil society and the media. We promote the inclusion of waste-based and advanced biofuels in the EU fuel mix as a sustainable means of reducing greenhouse gas emissions in EU transport. Our 60+ members active in most EU Member States collect and use waste and advanced feedstocks listed in parts A and B of Annex IX of the Renewable Energy Directive (REDII) to produce sustainable biodiesel with the highest GHG savings (up to +90%) when compared with fossil fuels, thus enabling “near-term decarbonization” of the EU road and maritime transport sectors. <https://www.ewaba.eu/>