ewaba
European Waste-based & Advanced Biofuels Association

Brussels, 16 March 2022

To: Ursula von der Leyen, President of the European Commission
Cc: Frans Timmermans, Executive Vice-President of the European Commission
Cc: Kadri Simson, European Commissioner for Energy
Cc: Ditte Juul Jorgensen, Director General for Energy of the European Commission
Cc: Raffaele Petriccione, Director General for Climate Action of the European Commission

Re: Waste-based and advanced biodiesel's contribution to EU energy independency

Dear President von der Leyen,

We write on behalf of the EWABA, the EU association representing the EU waste-based and advanced biodiesel supply chain. Our +35 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.

Our association strongly supports the Commission's REPowerEU plan to further increase the EU energy independency, in particular by accelerating the clean energy transition. In this context, and especially given its immediate decarbonization potential and cost-effectiveness compared with other waste-based renewable fuel alternatives, we believe that allowing increasing volumes of waste-based and advanced biodiesel in the EU fuel mix is a measure that would immediately decrease volumes of EU diesel imports from third countries and at the same time significantly reduce overall greenhouse gas (GHG) emissions in the EU transport sector.

While article 4 of the EU Fuel Quality Directive (FQD) allows the use of higher blends of biodiesel in the EU, the vast majority of EU Member States have not pursued this path. As part of the Fit for 55 package to deliver the EU Green Deal, the Commission has proposed a clearer formulation of the FQD provision allowing for higher blends. We believe that in addition to this proposal, Member States would embrace higher sustainable biodiesel blends more proactively if the relevant European standard (EN590) specification is exempted and/or modified so as to allow biodiesel content beyond the existing 7% limit, or by simply urging them to adopt higher blend standards EN 16734 (B10) and EN 16709 (B20 & B30).

The experience of our Portuguese member PRIO shows that directly marketing higher blends of biodiesel in diesel is currently possible[1] in Member States via an ad hoc exemption. The Portuguese

[1] Since 2018 PRIO is promoting higher blends in the Portuguese transport sector, both by selling pure waste-based biodiesel (B100) to captive commercial fleets, and by marketing ECODIESEL B15, a diesel blend with 15% of waste-based biodiesel, in its gas stations' network. Prior to the launch in the market of ECODIESEL, PRIO did extensive bench and road testing in cooperation with IPL (Instituto Politécnico de Leiria). These tests showed that a B15 blend can be used in any diesel vehicle, and that its use even brings some benefits in terms of energy conversion. Results from roller-bench tests and from several pilot tests with fleet owners point to a fuel consumption reduction of up to 5%. This means that ECODIESEL

practice shows that widespread use of higher biodiesel blends has resulted in zero compatibility incidents[2]. This can be further corroborated by an approval list[3] of existing passenger vehicles fully compatible with even higher biodiesel blends that has been compiled by our German sister association, the MVaK.

In this context we would like to kindly request that the Commission services:

- Consider the immediate role of waste-based and advanced biodiesel to reduce dependency on non-EU diesel when designing and implementing any further policy measures mirroring the recent REPowerEU plan, including measures to increase domestic and professional collection of waste oils and fats to be transformed into waste-based and advanced biofuels;
- Urge Member States to immediately introduce national exemptions to the 7% limit, imposed by EN590 standard, by adopting EN 16734 and EN 16709;
- Encourage European Committee for Standardization CEN's rapid adoption of a revised EN590 standard (by incorporating EN 16734 in it) and any ancillary standards (such as EN14214) in order to enable and facilitate the introduction of higher biodiesel blends in EU Member States.

Many thanks for your kind consideration of our request.

Best regards,

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contributes with a GHG's reduction of around 12% when compared to traditional diesel B7. When compared to fossil diesel, it goes up to 18%. All this without any change in vehicles' engines or infrastructures. ECODIESEL B15 complies with all technical parameters of EN590 except for the percentage of biodiesel (FAME) content upon the basis of an exemption included in the Portuguese legislation.

[2] The B15 blend is currently available in 21 gas stations across Portugal. More than 2.1 million liters have been sold (63% of which to private consumers) with no compatibility incidents reported.

[3] Accessible here: https://www.mvak.eu/wp-content/uploads/2021/12/Road-transport-Biodiesel-B10-approval-list.pdf