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FEFAC response call for evidence legal framework renewable energy production post 2030

FEFAC, the European association representing Industrial Compound Feed and Premix manufacturers, acknowledges the strategic importance of the legal framework on renewable energy production after 2030.

From a general perspective, the feed industry strongly supports enabling a favourable environment for renewable energy production and distribution. As an energy-intensive sector, we certainly depend on policy makers to ensure Europe manages to have a well-functioning supply and electricity grid for renewable energy production and use, both from the perspective of energy security and the need to reduce the carbon footprint linked to fossil fuel use.

At the same time, there is a strong connection between targets for crop-based biofuels production and animal feed use. Policy stimulation for the vegetable oil production for biodiesel use in Europe, particularly rapeseed and soybeans, has greatly supported the availability of protein concentrates in the form of rapeseed meal and soybean meal. The stimulation of bioethanol production is also beneficial to the feed sector, due to the availability of dried distillers' grains. Despite all intentions of the Common Agricultural Policy over the years, it can be argued that the Renewable Energy Directive has been the largest driver of EU protein production in the past decades, which is something that should not be sacrificed.

FEFAC calls for a cautious approach in the stimulation of advanced biofuels, through the Annex IX of the Renewable Energy Directive, as there are continuous discussions about placing resources on the list, which we consider circular feed. Precisely these resources, e.g. former foodstuffs, sugarbeet pulp, brewers' grains, animal fats, are products that underpin sustainable feed and sustainable livestock production.

While FEFAC supports higher ambition, we stress that the implementation of some of the targets and acceleration measures must be designed in a way that does not undermine EU food security, protein autonomy and the availability of the co-products for the compound feed production.

Recent crises, including the Covid19 pandemic and the war in Ukraine, have demonstrated how quickly the availability of grain, oilseeds, sugar beet and molasses can be disrupted, with direct impacts on the feed and food supply chain. In such situations, additional demand from the energy sector for the same limited biomass can exacerbate price volatility and jeopardise food and feed security. We therefore recommend that the post2030 renewable energy framework include clear safeguards allowing Member States to temporarily adjust blending mandates and other incentives where necessary to prioritise food and feed uses of critical materials in times of crisis.

Looking beyond 2030, FEFAC supports the establishment of comprehensive EU biomass and protein balance sheets covering food, feed, bioenergy and other non-food uses, building on existing tools such as the EU feed protein balance sheet. Such transparent data would allow policy makers to assess the cumulative impact of RED III, and other files, on the availability and price of key feedstocks, and to calibrate future targets and Annex IX updates in line with food security and feed autonomy objectives.