



F E F A C

FEFAC is willing to contribute to the upcoming debate on the revision of the renewable energy directive

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The European Commission is currently preparing a proposal to amend the Directive 2009/28/EC (Renewable Energy Directive, RED) and the Directive 2009/30/EC (Fuel Quality Directive). The proposal will especially address the Indirect Land Use Change (ILUC) associated with biofuels.

It is necessary to make the best use of the available land which means that Land Use Change is a legitimate concern. FEFAC members are committed to analyse the official Commission proposal in the coming weeks and to share their expertise with chain partners and European Institutions, in particular with regard to the supply and feed demand for by-products from the biofuel industry.

Without prejudging the outcome of the analysis on the final Commission draft proposal, FEFAC members consider that:

- The EU Commission should ensure market availability of agricultural raw materials for feed use for food production is not adversely compromised by EU biofuels policy development. In case of global market shortage, priority should be given to food and feed use. The mechanism to manage the market situation must be kept flexible, since supply problems can affect both energy and/or protein sources.
- Following the G-20 Farm Ministers recommendations, it is important to avoid any measure which could aggravate the present market access and supply situation for agricultural raw materials.
- For these reasons, a comprehensive economic impact assessment of the upcoming EU Commission proposal on the supply of agricultural raw materials and co-products should be carried out, under the leadership of DG AGRI, in order to encompass the full market expertise of key operators of the EU feed and food chain on agricultural markets
- As a general principle, the EU regulatory framework should provide operators with legal certainty and predictability.
- Feed is recognized as the most sustainable way to use by-products from the food chain. The EU biofuels legislation should therefore not promote any incentive which could divert these by-products into the use of advanced biofuels

Notes to the editor:

1. FEFAC, the European Compound Feed Manufacturers' Federation, represents 22 national Associations in 21 EU Member States as well as Associations in Switzerland, Turkey, Norway, Croatia, Serbia and Russia with observer/associate member status. The European compound feed industry employs over 110,000 persons on app. 4,000 production sites often in rural areas, which offer few employment opportunities.
2. For more information see our web site (www.fefac.eu) or please contact Alexander Döring, Secretary General Tel. +32-2-285.00.50, Fax +32-2-230.57.22, e-mail: fefac@fefac.eu.