

APAG's views on the

RENEWABLE ENERGY DIRECTIVE



Renewable Energy

APAG believes that any development of EU energy-related policies should not artificially displace raw materials from high-value uses such as in animal feed and oleochemical products to biofuels



Raw Materials

Diverting rendered animal fats cat 3 to biofuels production would inevitably lead to a shortage in the availability of the feedstock for the oleochemical industry, and others such as the animal feed sector.



European Green Deal

The Oleochemical industry is a crucial enabler of the European Green Deal through the use of by-products and renewable raw materials and contributes to the foundations of a robust and sustainable circular economy in Europe.



Implementation

Adapting the directive into a regulation would minimise the risk of market distortion on industry sectors that use feedstocks considered for use by the biofuels sector and decrease the potential for fraud.



Chemical Strategy for Sustainability

The Oleochemical Industry is a key player to help the Commission to "moving to safe and sustainable-by-design chemicals, including to sustainable bio-based chemicals, and investing in finding alternatives to substances of concern is crucial for human health and the environment, as well as an important precondition for reaching a clean circular economy".