

STATEMENT

April 2024

Annex IX of RED III: Animal fats category 3 not fit for Biofuel production

Brussels, 5 April 2024 – Following the European Commission's adoption of the amendment to Annex IX of the Renewable Energy Directive, APAG (a sector group of Cefic) welcomes the outcome on keeping animal fats category 3 out of Annex IX and supports its sooner adoption to secure stability and predictability of feedstock access in the industry.

The oleochemical industry is an enabler for a circular economy and an example of industrial symbiosis: we upgrade rendered animal fats (category 3), a by-product coming from the meat processing and rendering industry, into a large variety of bio-based and feed products which, in turn, are used by other sectors. As a result, our industry maintains renewable raw materials in the circular economy and help achieve the objectives of the European Green Deal. The availability of EU-sourced raw materials is one of the major aspects that contributes to the success of our industry.

Achieving EU defossilisation while safeguarding the bioeconomy sector

APAG fully supports the *defossilisation* of the road transport sector, however this endeavour should not put other sectors at risk. While the biofuels sector can thrive on alternative feedstocks listed in Annex IX of the RED, our industry relies heavily on animal fats category 3 for oleochemical products.



However, an increase in demand for biofuels could deviate animal fats category 3 from being used in oleochemicals products. The share of rendered animal fats category 3

used for biofuels has consistently increased¹, while its share for our industry has significantly decreased in the past few years. This is creating additional market pressure, leading to severe distortions of competition. The availability is limited, not flexible and dependent on meat consumption.

Calling for a strong cascading use principle and waste hierarchy

In line with the European Green Deal, we have been calling on legislators to support our industry by protecting continued access to raw materials. For our industry, animal fats category 3 are one of the key ingredients. A level playing field between the different uses of biomass is essential. Hence, we call for a strong cascading use principle and waste hierarchy to minimise distortive effects on the biomass raw material.

About APAG

The European Oleochemical Industry is a long-established sector of the European Bioeconomy. Since the early 19th century, the oleochemical industry has been using rendered animal fats cat. 3 and many other applications. To discover more on the oleochemical industry, go to our website or our LinkedIn Page.

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¹ Statistical Overview of the Animal By-Products Industry in the EU in 2022 presentation, EFPRA Congress 2023

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