



ReFuel EU: Animal fats category 3 are not suitable for Sustainable Aviation Fuels

Brussels, 2 May 2023 – Following the provisional political agreement concluded between the European Parliament and Council of the EU on the ReFuel EU Aviation proposal on 25 April, APAG (a sector group of Cefic), FEDIAF and FEFAC would like to express our views.

This agreement on the proposal is to boost the transition towards aviation fuels. Whilst we welcome the efforts to decarbonise the aviation sector, we would like to stress that this should not put other sectors at risk.

Achieving EU decarbonisation while safeguarding the bioeconomy sector

The European Commission's original proposal will be modified, including the extension of the scope of eligible sustainable aviation fuels (SAFs) and synthetic aviation fuels. For biofuels, the scope is extended to other certified biofuels complying with the Renewable Energy Directive (RED) sustainability and emissions saving criteria, up to a maximum of 70%, with the exception of biofuels from food and feed crops and the addition of two fuels (hydrogen and synthetic low-carbon aviation fuels), which can be used to reach the minimum shares in the respective part of the regulation¹. Our industries are concerned because, in the co-legislators' amendment proposal, agricultural residues, including certain animal fats, were proposed as being suitable to produce SAFs.

While the biofuels sector can thrive on other feedstocks listed in Annex IX of the RED, our industries cannot function sustainably without access to sufficient quantities of animal fats category 3, which are fit for animal nutrition and oleochemical products. These fats have many functions in feed, providing a source of energy and palatability but above all essential fatty acids. An increase in demand for biofuels, in particular in the aviation sector, could deviate animal fats category 3 from pet food, animal feed and oleochemical uses.

Calling for a strong cascading principle use and waste hierarchy

In line with the European Green Deal, we have been calling on legislators to support our industries by protecting continued access to raw materials. A level playing field between the different uses of biomass is essential. For our industries, animal fats category 3 are one of the key ingredients. Hence, we call for a strong cascading use principle and waste hierarchy to minimise distortive effects on the biomass raw material market and harmful impacts on biodiversity. The share of rendered animal fats category 3 used for biofuels has consistently increased, while its share for our industries 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.

The oleochemical, pet food and feed industries are enablers of 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 industries maintain renewable raw materials in the circular economy and help achieve the objectives of the European Green Deal.

¹ <https://www.consilium.europa.eu/en/press/press-releases/2023/04/25/council-and-parliament-agree-to-decarbonise-the-aviation-sector/>