

UNICA position on draft European Parliament reports (ITRE & ENVI) on the RED II proposal



The Brazilian Sugarcane Industry Association – UNICA – welcomes some of the recommendations of the European Parliament ITRE and ENVI Committee reports on the European Commission’s Renewable Energy Directive proposal, but regrets that neither goes far enough.



1. **We strongly support** ENVI’s recommendation of **increasing overall EU binding targets of renewables** in the energy mix **from 27% to at least 45%**.

2. **We welcome** ITRE’s recommendation of **increasing the share of renewables in transport** from the maximum 10.6% originally proposed by the EC, **but consider a 12% target to be unambitious. We call for a 20% target** of renewables in transport.



3. **We support** the ENVI committee’s approach of **evaluating first-generation biofuels based on their greenhouse gas emission (GHG) savings**. This is a sound approach – GHG savings should be **the only meaningful criterion of evaluation**.

4. **We regret** that the ENVI committee **has maintained the Commission’s proposed 3.8% cap** on first-generation biofuels. **We strongly defend the current cap of 7%, which should remain unchanged** and is essential to the decarbonisation of European transportation.



5. **We do not agree with the inclusion of ILUC estimates when calculating the GHG emission savings of first-generation biofuels**, as long as a predictable methodology and sound review process is in place.

Transport already accounts for almost a quarter of all emissions in Europe, with 70% of those coming specifically from road transport. European road traffic is set to increase by 30% within the next 12 years. The EU will not achieve its decarbonisation targets without sustainable conventional biofuels, the reduction of which will increase Europe’s reliance on fossil fuels.

Moreover, the current 7% cap was agreed only two years ago, a timeframe too short to successfully assess the effectiveness of the current legislation. The EU cannot achieve sound and effective policy by constantly changing targets and shifting the goalposts.

We disagree with the inclusion of ILUC factors as **no methodology for calculating and up-dating these factors is foreseen**, as well as **no provision for the periodic review of the numbers**. This makes the ILUC factors questionable, unpredictable and totally subjective. Finally, the carbon debt generated by ILUC is repaid after 20 years, meaning that **raw materials continuously planted on productive areas that are more than 20 years old shall be exempted from ILUC factors**.

About UNICA

UNICA is the leading trade association for the sugarcane industry in Brazil, representing 60% of the country’s sugarcane production and processing. UNICA’s priorities include serving as a source for credible information and analysis about the efficiency and sustainability of sugarcane products, particularly ethanol and bioelectricity. The association works to encourage the continuous advancement of sustainable practices throughout the sugarcane industry and to promote sugarcane-based biofuels as a clean, reliable alternative to fossil fuels.

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