



## EuropaBio comments on the draft delegated act on climate-related objectives under the Taxonomy Regulation

December 2020

EuropaBio supports the Commission's intent in developing sustainable financing as part of the Green Deal. However, we believe that the publication of [the first draft delegated act and its annexes](#) poses a serious threat to the bioeconomy and its ability to contribute towards climate change mitigation and adaptation, specifically by excluding food and feed crops from the manufacture of bio-based products and ingredients. Food and feed must primarily serve food security but should also be available for other bio-based products.

The bioeconomy can play a significant role in contributing to Green Deal objectives. Use of bio-based products can help accelerate the shift towards a greener economy, creating jobs and growth, and reducing dependence on fossil-based carbon and CO<sub>2</sub> emissions. Excluding food and feed crops from sustainable finance schemes would fail to acknowledge such benefits and threaten to hinder the development of parts of the bioeconomy. Food and feed crops are the most established agricultural commodity chains globally, presenting the highest cost competitiveness as well as year-round availability and reliable sourcing. Developing the bioeconomy requires building on these global commodity streams.

### 1. Sustainable sourcing of biomass

EuropaBio fully supports the sustainable sourcing of biomass, taking food security, land use and biodiversity loss into account. Biomass is a valuable resource, and many parameters need to be considered when assessing its use. In many cases, there is complementarity between food and non-food uses of biomass. Restricting the use of feedstocks usable in the bioeconomy would drastically limit the availability of biologically accessible materials, preventing the synthesis of value-added products.

This indicates that the exclusion of food & feed crops does not necessarily enhance the sustainability of the bioeconomy. Focus should rather be on setting and enforcing criteria for the sustainable sourcing of biomass. For instance, Annex I of the draft delegated act provides recommendations to protect non-agricultural land with high carbon stock from land use change. Similar provisions could be considered for the recommendations on food or feed crops.

### 2. Considering all three pillars of sustainability

In addition to the environmental pillar, the social and economic pillars of sustainability should also be considered. The use of food and feed crops for biomass contributes to the sustainability of farms by ensuring farmers' income and the continued production of food crops. All outlets of the bioeconomy are instrumental in preserving the competitiveness of its industries and their suppliers. Restricting the use of renewable raw materials puts the value chain at stake.

### 3. Cohesive policymaking

The draft delegated act is intended to supplement Regulation 2020/852, which provides several requirements for technical screening criteria (Article 19). The criteria outlined in the draft delegated act are not fully in line with requirements around conclusive scientific evidence and assessment of the potential market impacts of the transition to a more sustainable economy.

Also, we note inconsistencies between the consequences of the draft delegated act as it currently reads and EU statements/policies, e.g. the Commission's long-term strategy for decarbonisation; the new Circular Economy Action Plan and the Bioeconomy Strategy.

Bio-based solutions are based on currently available technologies and feedstocks. Limiting these will also limit the opportunity to deliver sustainable solutions to the EU green transformation. On this basis, EuropaBio would support a more inclusive view of feedstocks eligible for sustainable financing mechanisms, by for instance taking into consideration sustainable sourcing rather than simply limiting feedstocks (see Annex 1 attached). This approach would promote the future innovation and investment in the bioeconomy and in doing so assist in the gradual further transition towards alternative feedstocks.



**Annex 1: Recommendations from Annex 1 of the draft delegated act on Taxonomy that EuropaBio would suggest deleting:**

**Page 89:**

*Food or feed crops are not used as bio-based feedstock for the manufacture of organic basic chemicals.*

**Page 95:**

*Food or feed crops are not used as bio-based feedstock for the manufacture of plastic in primary form.*

**Page 126:**

*Food and feed crops are not used in the activity for the manufacture of biofuels for use in transport.*

**Page 164:**

*Anaerobic digestion of bio-waste: In the dedicated bio-waste treatment plants, bio-waste constitutes at least 90 % of the input feedstock, measured in weight, as an annual average, and the share of other input material is less than or equal to 10 % of the input feedstock. Such other input material may not include food or feed crops.*

