

Fuels linked to deforestation and food price increases risk flooding the European aviation market

Dear Member of the European Parliament,

Ahead of your vote on the ReFuelEU aviation report on 07 July 2022, we urge you to vote for a package that does not promote aviation biofuels linked to deforestation and food price increases. A strict definition of sustainable aviation fuels (SAFs) is necessary to achieve the goals of the European Green Deal and to maintain the credibility of the aviation industry. SAFs are essential to the sector's green recovery and the aviation industry will harm its long-term reputation with its customers and the general public, by letting in harmful fuels.

Airlines and climate NGOs alike are concerned by the European Parliament's Transport (TRAN) committee expansion of the definition of SAFs to widen the feedstock base for biofuels and would urge a return to the European Commission definition, only including feedstocks from the Annex IX of the Renewable Energy Directive (RED).

SAFs have an important role to play in the decarbonisation of aviation. Now is the time to select the right type of SAF, because their sustainability depends on the feedstock that they are made from.

The Commission's original ReFuelEU proposal went some way towards selecting the right types of SAFs. It largely focused on advanced biofuels and synthetic aviation fuels. The ITRE and ENVI European Parliament committees, who provided opinions on ReFuelEU, followed this and even improved on it by capping biofuels derived from Annex IX part B feedstock. This is important as they are only available in very limited quantities and have a competing use with other industries. However, the TRAN committee changed the definition of SAFs by including more biofuels.

Issues with an expanded biofuels definition

This new and widened definition of SAFs risks flooding the market with biofuels produced from raw materials already used by other sectors and locking in unsustainable practices. **The change in definition significantly weakens the sustainability of ReFuelEU, as it opens the door to the following feedstocks, which all have competing uses and would therefore cause displacement emissions:**

- **Palm Fatty Acid Distillate (PFAD)** - is a by-product of the palm oil refining process. PFADs are already entirely used in other industries, including soap-making, livestock feed, and, in rare cases, combustion for energy. When they are diverted from these existing uses, they are replaced with the cheapest oil alternative. The existing use of PFADs in biofuels used in the road sector has already [diverted](#) this resource from other uses and very likely resulted in increased production of virgin palm

oil as a replacement feedstock for these uses. Because PFAD's closest substitute is palm oil, they are associated with high indirect land use change emissions.

PFADs are an oily feedstock that can be processed in the only commercially available SAF conversion pathroprocessing, which produces hydroprocessed esters and fatty acids (HEFA). Since hydroprocessing is a mature technology, it would be very attractive to produce SAF using PFADs in order to meet ReFuelEU ambition. Even though the European Commission has defined palm oil as a high ILUC risk feedstock, meaning it will not be incentivized under the RED after 2030 (exceptions remain), global palm oil production is growing at a linear rate. **According to ICCT [calculations](#), the life-cycle direct and indirect greenhouse gas emissions of PFAD is more than 2.5 times worse than that of fossil fuel. The ICCT projects that there would be enough PFADs available in 2030 to meet the entirety of the 6% 2030 SAF mandate the TRAN committee is proposing in the EU, outside the 2% power-to-liquids submandate. Jet fuel demand in 2030 is estimated to be 49.37 million tonnes, based on a previous [ICCT analysis](#). Thus, 4% of total jet biofuel is 1.97 million tonnes. ICCT calculates that 2.38 million tonnes of PFAD HEFA could be produced in 2030. In the years following 2030, even more PFAD HEFA will contribute to the targets unless this is prevented.**

- **Animal fats cat III** - are fit for use in food, feed, oleochemical and other industrial uses, and are already entirely used in other sectors, including pet food and feed in animal farming. The most likely substitute for category 3 animal fats in its existing uses in Europe is palm oil, given that it has the most similar chemical properties to animal fats of all vegetable oils and is generally the least expensive. Given the large quantities of animal by-products in Europe, category 3 animal fats could make a very large contribution to the ReFuelEU SAF mandate, with strongly negative impacts on global land use change and emissions, due to the additional palm oil that will be used in competing industries.

- **Intermediate crops** - planted before or after the main crop. The definition of food and feed crops in the REDII explicitly excludes biofuels produced from food and feed crops grown as intermediate crops. These are crops other than the main crop, "provided that the use of such intermediate crops does not trigger demand for additional land." There is no further guidance in the REDII or any European Commission documents about how Member States should interpret and implement the condition on triggering "demand for additional land."

Absent such guidance, certification schemes could potentially allow very large quantities of biofuels produced from crops grown outside the primary growing season to be qualified as intermediate crop SAF, which would be a back door to allow crop based biofuels to fuel the aviation sector. Intermediate crop biofuels could potentially make a limitless contribution to the SAF targets. Because these are in producing countries such as Brazil considered as cash crops and well-integrated into existing markets, **diverting these resources to biofuel production will result in exactly the same food price increases and land use change GHG emissions as food- and feed-based biofuels produced from main crops.** Allowing these crops in a context of global food insecurity would be irresponsible.

Growing two food or feed crops in the same year is common practice in some countries with mild climates such as Brazil. For example, two-thirds of maize production in Brazil (77 million tonnes in 2020) is produced as a second (intermediate) crop. Intermediate crops should not be used as SAFs as their use and growth could have the same [damaging effects](#) for the environment as crop based biofuels.

We urge you to return to the Commission’s original ReFuelEU proposal (either via AM 112 or via equivalent split votes), with a definition of SAFs that works for people and the planet. This is the opportunity to stay firm on your determination to accelerate the just transformation of the European economy towards climate neutrality and to achieving the EU’s climate targets and international commitments under the Paris Agreement.

‘sustainable aviation fuels’ (‘SAF’) means aviation fuels that are either synthetic aviation fuels, advanced biofuels as defined in Article 2, second paragraph, point 34 of Directive (EU) 2018/2001, or biofuels produced from the feedstock listed in Part B of Annex IX to that Directive, which comply with the sustainability and greenhouse gas emissions criteria laid down in Article 29(2) to (7) of that Directive and are certified in accordance with Article 30 of this Directive;

We remain at your disposal for any further exchange on the issue.
Yours sincerely,

Signatory organisations

easyJet
Transport & Environment