

# **Public consultation on accounting methods and conditions for the 10% renewable energy in transport target – and on the need for additional types of biofuels being listed in Annex III of the Renewable Energy Directive**

## **APAG CONTRIBUTION, BRUSSELS JUNE 13TH, 2011**

### **Section A: Electricity from renewable sources in transport:**

Given that electricity is generated from both renewable as well as non-renewable sources,

1. how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of electric vehicles?

**Important, along with other policies/developments**

2. under what condition do you think it would be justified to count the whole amount of electricity in electric vehicles as renewable?

**When the electricity comes with a tradable certificate showing that that amount of renewable electricity was generated**

3. what benefits do you expect the option you selected under (2) will have:

**Faster development of electric vehicles**

4. what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:

**Additional statistics collection in all Member States**

### **Section B: Hydrogen from renewable sources in transport**

1. Which are in your view the most likely ways to produce hydrogen from renewable sources (partly or fully) by 2020?

**No comment**

2. For each option you selected under (2), if it would be used for transport, how would you suggest to calculate its contribution to the 10% target for renewable energy in transport?

**No comment**

### **Section C: Biomethane via the natural gas grid in transport**

Given that methane in the gas grid originates mostly from non-renewable sources (natural gas),

1. how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of methane vehicles fuelled by methane from the gas grid?

**Important, along with other policies/developments**

2. under what condition do you think it would be justified to count the whole amount of methane extracted from the gas grid for the use in vehicles as renewable?

**None, until the time that all methane injected into the gas grid concerned is originating from renewable sources**

3. what benefits do you expect the option you selected under (2) will have:

**Other (please specify):**

**A clear identification of feedstock and processes applied to produce biomethane and the opportunity to steer the feedstock being used avoiding collateral damages to industrial and private users of these raw materials.**

4. what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:

**Additional statistics collection in all Member States**

#### **Section D: Energy content of biofuels**

According to the National Renewable Energy Action Plans, Member States estimate that the contribution of biofuels will be approximately 9.5% of energy consumed in transport, most of which is expected to be biodiesel and bioethanol.

1. Do you think additional types of biofuels need to be listed in Annex III of the Directive? If yes, which ones and could you provide values?

**In order to protect the environment, to avoid unwanted additional CO<sub>2</sub> emission through destruction of biodiverse forests and to protect the independence of EU industry by using domestic raw materials, Methylesters of “animal oils” should neither be considered as fuel nor being named fuel!**

**”Animal oils” are rendered animal fats from animal by-products and produced according to specifications. As such they are neither “waste” nor “residue”. Their availability is limited to the meat consumption, thus the available volume cannot be grown in order to serve as a fuel. The ONLY technical alternative for animal fats is Palm oil!**

2. Do you think more precision in terms of decimals is necessary in the values in the Annex? If yes, could you provide such values?

**No comment**

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