



A sector group of Cefic



Fuel EU: Animal fats category 3 are not suitable for Sustainable Maritime Fuels

Brussels, 29 March 2023 – Following the provisional political agreement concluded between the European Parliament and Council of the EU on the Fuel EU Maritime proposal, APAG, FEDIAF and FEFAC would like to express their views.

Last week, the European Parliament and the Council of EU reached an agreement on the proposal for the Fuel EU Maritime Regulation, boosting the transition towards sustainable maritime fuels. Whilst we welcome the efforts to decarbonise the shipping sector, we would like to stress that this should not put other sectors at risk.

Achieving EU decarbonisation while safeguarding the bioeconomy sector

While the biofuels sector can thrive on other types of feedstocks, the oleochemical industry cannot function sustainably without access to sufficient quantities of animal fats category 3. Similarly, pet food and feed industries heavily rely on it. Fats derived from category 3 by-products have many functions in feed, providing a source of energy and palatability but above all essential fatty acids. An increase in demand, from any mode of transport, but in particular the maritime sector, would keep animal fats category 3 from being used in production of pet food and animal feed as well as other oleochemical uses.

Calling for a strong cascading principle use and waste hierarchy

We welcome the alignment on sustainable maritime biofuels by qualifying feedstocks listed in Annex IX of the Renewable Energy Directive as sustainable biofuels for maritime transport and the move towards renewable liquid and gaseous fuels of non-biological origin (RFNBOs). In line with the objectives of the European Green Deal, this supports our industries by protecting their sustainable business models and their continued access to raw materials.

However, we have been sharing our concerns on diversion of one of the key feedstocks – animal fats category 3 – for biofuel production. For our industries, animal fats category 3 are one of the key ingredients. We, therefore, 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 oleochemical, pet food and feed industries are enablers of the circular economy and examples of industrial symbiosis: our industries upgrades rendered animal fats (category 3), a by-product from the meat processing and rendering industry, into a large variety of bio-based products. These products, in turn, are used by other industrial sectors and end-users across the EU. As a result, our industries keep renewable raw materials in the loop and help achieve the objectives of the European Green Deal. This would continuously be possible with a sufficient supply of animal fats category 3 in the EU market.