The CEPM (Confédération Européenne de la Production de Maïs) would like to underline that sustainable biofuel within the RED II scope should be fully accounted for helping fighting the climate change. RED II sustainable Maize used to produce bioethanol or biomethane fulfills the stringent CAP conditionnalities criteria. And the CEEAG should take a real neutral technology approach as it seems to claim it but is actually hampering it by conditionalities on clean mobility that aim to phase out aids to internal combustion engines cars running on biofuels on low carbon alternative fuels.

Points (76, 77, 96) : the CEPM understanding of the proposal, is that sustainable RED2 biofuel aids (wether investments or operating) are continued with the CEEAG. CEPM welcomes this proposition. Nevertheless, CEPM would like to clarify that high ILUC risks biofuels leading to the extension of agricultural land into areas with high-carbon stock, such as forests, wetlands and peatland, have to be clearly excluded from state aids. CEPM also welcomes that any biofuels will continue to benefit from supply obligation.

Points (161 to 164 / clean mobility), CEPM regrets that the proposal limits or forbids state aids for vehicles that actually wouldn't be « zero emissions » because that may create « lock-in » emission technologies such as internal combistion engines , at least from 2026 onward. CEPM would like to stress that the « tailpipe zero emission » approach taken by the EU Commission in its proposal doesn't take into account all GHG emission of the mobility technologies. To bring fairness and consistency, the proposed state aid should be based on Life Cycle Analysis (from Well-to-Wheel) including for example GHG emissions from electric batteries manufacturing. Currenrly, biofuel sustainability is based on the LCA approach and so should it done at least for all energies. Furthermore, a new regulation beginning from december 2020 imposes an On Board Fuel Consumption Meter that will monitor the fuel consumption of every cars. CEPM thinks that instead of excluding all alternative fuel based cars as if they were fossil fuel ones, the CEEAG should promote their development based on the use of this monitoring technology that could prove the use of the sustainable biofuels. Then E85 (ethanol 85) hybrid cars could deliver their substantial benefits against climate change.

These remarks may apply also to biogas infrastructure.

Finally, CEPM would like to stress that bioethanol or biomethane fermentation produces also biogenic CO2 as part of the transformation process. The CEEAG should facilitate supporting the capture and storage of this CO2 as it is litteraly pumped out of the atmosphere. The BECCS is much more interesting than the CCS from fossil fuels.