



Comments

The Association of the German Biofuel Industry (Verband der Deutschen Biokraftstoffindustrie e. V. - VDB) represents the interests of twelve biodiesel producers in Germany with a production capacity of 2.3 million tons. This equals approximately 60% of the total capacity in Germany.

VDB supports the European Commission in its effort to evaluate the current State Aid rules under the form of a fitness check. In order not to anticipate the outcome of this evaluation, the guidelines on State Aid for Environmental Protection and Energy should be extended until at least 2022, including biofuels and especially those in support of food-based biofuels (paragraphs 113 and 121). Without such an extension, the use of higher biodiesel blends (B20, B30) and pure biodiesel (B100) could not be fostered anymore by fiscal instruments. Looking at the enduring importance of biofuels from agricultural feedstocks, European producers of conventional biofuels as well as European farmers are in danger of suffering remarkable losses.

Reasons:

The evaluation process is to provide an evidence-based judgement of the comprehensive existing State Aid issue. If no extension of the guidelines concerning biofuels was provided, there would be no reason for the evaluation of this element anymore. The criterion for the evaluation is to investigate whether an existing intervention is effective, efficient, relevant given the current needs etc. The investigation must fail if the State Aid for biofuels ceases to exist.

In case State Aid is granted to other economic operators in the field of Environmental Protection and Energy beyond 2020, this could result in a discrimination of the biofuel industry and the whole European value chain.

Many EU Member States strongly rely on biofuels to reach their climate goals by reducing GHG emissions in the transport sector. If an important part of this measure could not be employed because the State Aid rules concerning biofuels were surprisingly not extended until 2022, this would result in incoherent legislation and lower achievements concerning climate protection.

Therefore, VDB is in favour of allowing EU Member States to support their biofuel production at least until 2022.

**Association of the German
Biofuel Industry**

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