To
Vice-President of the European Commission, Mr Katainen
Vice-President of the European Commission, Mr Šefčovič
Commissioner for Climate Action and Energy, Mr Cañete
Commissioner for Agriculture and Rural Development, Mr Hogan

CC:
Director General for Energy, Mr Ristori
Director General for Climate Action, Mr Delbeke
Director General for Agriculture and Rural Development, Mr Plewa

Brussels, 5 March 2015

Subject: cascading principle in ILUC (2012/0288(COD)) following EP COM ENVI vote, 24 February 2015

Dear Vice-President,
Dear Commissioner,

The Confederation of European Forest Owners (CEPF), the European farmers and agri-cooperatives (Copa-Cogeca) and the European Landowners’ Organisation (ELO), representing Europe’s key primary biomass producers, want to express their concerns on the outcome of the EP Environmental Committee vote on ILUC on 24 February, before the upcoming trilogue in March.

The Members of the European Parliament adopted the inclusion of the cascading principle in the ILUC directive, as a binding element under the sustainability criteria of the Renewable Energy (RES) Directive, Article 17.

CEPF, Copa-Cogeca and ELO strongly oppose the inclusion on the cascading principle in the ILUC directive and into EU legislation. It is not EU’s competence to decide how biomass as a raw material should be used. This should be left to the open markets to decide. The principle is neither defined nor has it been assessed of its impacts.

The members of the undersigned organisations do not support an EU regulative and legislative approach on the final use of biomass, which in its consequence would require EU driven standards, control and compliance mechanisms. This is not in line with the Commission intention to reduce red tape, nor with the new Commission’s agenda to promote jobs, growth and development.

The inclusion of the cascade principle in the RES directive, as a legal obligation, would hinder the further development and investment into advanced biofuels, bio-based industries as
well as the overall bioeconomy and with this risk not achieving the EU 2030 targets for the climate and energy policies.

Thank you for taking our position into consideration.

Sincerely yours,

Aljoscha Requardt  
Secretary General of CEPF

Pekka Pesonen  
Secretary General of Copa-Cogeca

Thierry de l’Escaille  
Secretary General of ELO

For further information, please contact

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