PUBLIC CONSULTATION

Bioenergy Europe's Feedback on the Call for Evidence on the Biotech Act II

Bioenergy Europe welcomes the ambition of the Biotech Act II to strengthen Europe's bioeconomy and industrial competitiveness. The initiative should create harmonised framework conditions for sustainable bio-based value chains, support investment certainty, and accelerate the deployment of bio-based solutions that contribute to decarbonisation, circularity, and European resilience.

The Biotech Act II should adopt an inclusive and technology-neutral approach to biomanufacturing, recognising the broad range of sustainable biomass conversion pathways, including biological, mechanical, chemical and thermochemical processes.

It should also help reduce regulatory fragmentation across Member States by promoting greater harmonisation, regulatory predictability, and efficient market access for bio-based value chains.

However, we call upon the European Commission to **ensure that the Biotech Act II avoids unnecessary regulatory duplication and recognises the role of established biomass value chains in enabling sustainable feedstock mobilisation across the wider bioeconomy**.

In this context, we call on the European Commission to consider the following points:

1. **Sustainability and verification should be based on existing EU frameworks**
2. **A pragmatic approach to biomass use and cascading is needed**
3. **Existing biomass supply chains should support wider bioeconomy deployment**

1. Sustainability and verification should be based on existing EU frameworks

Bioenergy Europe welcomes a consistent and harmonised approach to sustainability verification under the Biotech Act II.

When it comes to biomass feedstocks, any sustainability requirements related to bio-based content, biomass sourcing, or market incentives **should be based on the existing sustainability and verification standards outlined in the Renewable Energy Directive (RED III), particularly Articles 29 and 30.**

The Renewable Energy Directive already sets out criteria for biomass sourcing, biodiversity protection, land-use safeguards, forest regeneration, carbon stocks, greenhouse gas performance, and traceability. These provisions apply to both EU and imported feedstocks and are supported by recognised certification systems and verification methodologies.

Therefore, the Biotech Act II should avoid creating parallel sustainability systems or additional reporting frameworks that would duplicate current obligations.

Existing chain-of-custody systems, mass-balance approaches, recognised voluntary certification schemes, and risk-based verification methodologies already provide a practical foundation for demonstrating sustainability and traceability throughout biomass value chains.

2. A pragmatic approach to biomass use and cascading is needed

Bioenergy Europe supports the **efficient use of biomass throughout the bioeconomy**. We encourage the use, reuse, and recycling of biomass whenever they are technically, environmentally, and economically viable.

However, policy frameworks should avoid rigid assumptions concerning the allocation of biomass among its various end uses. Biomass is not a homogeneous resource: the feedstocks vary in quality, regional availability, logistics, sustainability characteristics, and end uses.

Biomass plays a crucial role in achieving various climate and industrial goals. It contributes to renewable heat, electricity, transport fuels, bio-based materials, and renewable carbon products, all of which are essential for the transition to climate neutrality. It is important to recognise that **bioenergy should not be viewed as a low-value or easily replaceable use of biomass**. Instead, it

is a significant contributor to the EU's energy transition and is expected to continue its vital role alongside emerging bio-based applications and carbon removal strategies, including bioenergy with carbon capture, utilisation and storage (BECCS).

One key aspect of biomass is that its most suitable use is context-specific.

Residues, co-products, and by-products from sustainable forest management, agriculture, and industrial processes can contribute to multiple value chains, including renewable energy.

Wider restrictions on specific feedstocks or end uses, including bioenergy, could lead to unintended consequences such as reduced incentives to utilise lower-value materials, decreased viability of thinnings, and other forest management practices.

Any further intervention on cascading should only be considered if there is clear evidence that the current arrangements are insufficient, and that additional measures will not create greater distortions.

Therefore, a pragmatic approach to biomass cascading is essential: one that promotes efficient use of biomass without imposing inflexible hierarchies that overlook regional circumstances, market realities, or the broader need for decarbonisation.

3. Existing biomass supply chains should support wider bioeconomy deployment

Sustainable biomass value chains currently facilitate feedstock mobilisation, certification, logistics, and market access throughout Europe. These supply chains underpin the mobilisation of biomass resources, making them available for various bio-based applications.

The availability of sustainable biomass relies not just on the potential of natural resources but also on the economic and regulatory conditions that facilitate the mobilisation of feedstock. Long-term market visibility, stable demand, efficient logistics, and robust certification systems are fundamental to ensuring that sustainable biomass can continue to contribute to the European bioeconomy's evolution.

To successfully scale up sustainable bio-based pathways, we need not only innovation but also effective supply chains, investment certainty, and stable regulatory frameworks. The competitiveness challenges faced by bio-based products stem from multiple factors, including

technology maturity, production scale, infrastructure, and the numerous and long-standing advantages enjoyed by fossil-based value chains.

Policies that weaken existing sustainable biomass markets will not address these structural challenges. Instead, they will reduce feedstock mobilisation, which is crucial, and weaken supply chains and investment.

The development of new bio-based markets should therefore complement existing sustainable biomass value chains rather than weaken them. Policies must support the complementary deployment of bio-based applications without creating unintended barriers that might decrease the availability of sustainable biomass or undermine established value chains.

Bioenergy Europe is the voice of European bioenergy. It aims to develop a sustainable bioenergy market based on fair business conditions. Founded in 1990, Bioenergy Europe is a non-profit, Brussels-based international organisation bringing together associations and companies, as well as academia and research institutes from across Europe.