

Q.1.1:

Yes, but limited to criterion 1. Criteria 2 and 3 look complex to implement within the EC and almost impossible to verify in developing countries.

Q.1.2:

Minimal impact as to criterion 1, assuming the WELL-to-WHEELS parameters are accepted by default. Criteria 2 and 3 might lead to unnecessary bureaucracy and an excess of discretionary power for local administrations. Particularly in non EC countries where investors might be forced into non-transparent practices.

Q.1.4:

No

Q.1.5:

No. There are other regulations already in place whereby states can protect biodiversity effectively.

Q.2.1:

This proposal looks pointless. There are still plenty of abandoned and semi-arid land that can be used for oil crops before touching any forest or biodiverse environment. The point is to protect the latter and to encourage the re-use of the former. Monitoring agricultural prices seems far more important at this stage. Once biofuels become a recognised need for the global sustainability, a functioning market will decide the best allocation between food and energy crops. But a functioning market needs constant observations and some guidance / incentives to work properly.

Q.2.2:

No

Q.3.1:

c), by using the efficiency in energy saving and GHG reduction – as per WtW report.

Q.3.2:

Suggest using a weighing based on the efficiency in energy saving and GHG reduction.

Q.3.3:

Yes

Q.4.1:

Imposing compulsory blending on large oil companies is fine, but the main way forward must be to encourage high-blend biodiesel (B-100 first of all). This is the only way to promote the European biodiesel industry and the related agricultural production, which can be competitive only for quality products, while compulsory blending will mainly use cheap import products.

Q.4.2:

Yes, by differentiating the excise policy. The exemption should be limited to high blends. This would encourage the European biofuels industry, its innovation and quality efforts, as well as the interest of car manufacturers to invest more in biofuel-compatible models.

Excise exemption on compulsory blending is less meaningful, particularly when low-quality imported oils are used.

High blends producers should also be exempted from the obligations on *fiscal deposit*, which are burdensome for SMEs that are the main producers of high blend biofuels in the EU. Also, RME standards should be modified to include biodiesel made from HO Sunflower which can substitute Rapeseed quite efficiently in Southern Europe.

Q.4.3:

Yes, especially for BTL, but at the moment it looks too early for large scale production. R&D and technological innovation should be promoted at this stage and its achievement be monitored carefully, so as to be ready with specific incentives when the cost differential will become affordable.