



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

Directorate C - Renewables, Research and Innovation, Energy Efficiency
C.1 - Renewables and CCS policy
The Head of Unit

Brussels, **11 AVR. 2017**
BK/abd/ ener.c.1(2017) 2122195

**To the voluntary schemes that
have been recognised by the
Commission for demonstrating
compliance with the sustainability
criteria for biofuels**

Subject: Implementation of the updated GHG emission calculation methodology

Dear Madam,
Dear Sir,

Over the last weeks, a couple of questions have been addressed to the Commission with regard to the implementation of the methodology for calculating actual GHG emissions savings of biofuels.

All voluntary schemes that have been recognised by the Commission since August 2016 are required to implement an improved GHG emission certification methodology, which requires that information on GHG emissions of biofuels and raw material is transmitted in a new – more detailed - form. The main question that arose in this context concerns the transition from the old scheme rules, to the updated scheme rules and in particular how operators should act when receiving information on GHG emission savings in a format that is not compatible with the improved certification methodology. We recognise that this transition, as any transition in a complex system, is challenging. However, it is certainly not impossible and the described case can indeed be solved. In case operators received proofs demonstrating compliance with the GHG emission requirements that are not issued in accordance with the updated scheme rules (the more detailed – form), **we would recommend applying the following approach, until further notice:**

- Accept sustainability proofs regarding compliance with the land-use criteria (Article 17(3)-(5) of Directive 2009/28/EC).
- Apply the corresponding default value, or disaggregated default value, instead of the actual GHG emission data stated in an incompatible format.

In due time, we will inform you about the delay for phasing out this transitional approach.

Moreover, I would like to underline that all schemes whose recognition has been extended have been assessed based on their improved GHG emission certification methodology. Consequently, the implementation of these rules must be considered a

prerequisite for a continued recognition and, therefore, we would request that all requirements are fully implemented at the latest by end of August 2017.

Finally, I would like to inform you about two related matters:

- First, in line with the note on conducting and verifying actual calculations of GHG emission savings¹, we have uploaded, at the end of last year, a list of regional average levels of cultivation emissions (expressed in g CO₂eq/kg of feedstock). The values are based on information received from the Member States. Please note that the list does not cover yet all regions. We plan to amend it as soon as we receive the missing information.
- Second, an update of the note on conducting and verifying actual calculations of GHG emission savings² has been uploaded on the web site of the Commission dedicated to voluntary schemes. It includes a small correction in one of the formulas and a clarification on how the carbon footprint of fossil methanol needs to be taken into account.

Thank you for your attention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Paula', with a large, stylized flourish on the left side and a smaller flourish on the right side.

Paula Abreu Marques

¹ BK/abd/ener.c.1(2015)4507918

² BK/abd/ener.c.1(2017)2122195