BRIEFING - March 2026

# Not what they promised

Is Eni’s seed oil project in Kenya reliant on imports of food crops from abroad?

# Summary

In 2024, the International Finance Corporation (IFC) and the Italian Climate Fund announced a $210 million investment in Eni's Kenyan subsidiaries to expand the production and processing of advanced biofuels, supporting the decarbonisation of the global transport industry and the livelihoods of up to 200,000 small-scale Kenyan oilseed farmers.

The stated aim outlined in IFC's press release is to grow non-edible oilseed crops like castor, croton, and cotton seeds on lands where growing crops is difficult, as not to compete with food supplies.

Successfully growing non-edible feedstocks on poor quality, marginal lands would go a long way to appeasing major concerns over biofuels around deforestation and competition with food production. There are growing expectations for these feedstocks as part of a broader uptake in biofuels within the global transport decarbonisation efforts.

**Not what they promised**
Yet, trade records and public data accessed by T&E and verified by Source Material show that Eni's Kenya subsidiaries have been importing large quantities of rapeseed from South Africa. Identified customs records indicate that significant volumes of rapeseed oil have then been re-exported to Italy to be refined into biofuel, possibly accounting for up to 80% of all of Eni's exports from Kenya to its refineries in Gela and Venice in 2025.

Taken together, these data appear to suggest that current volumes of locally produced non-edible oilseeds are insufficient to account for observed export levels, with imported food crops making up a significant share of feedstocks processed in Kenya. This raises serious questions over the viability of growing non-food crops to meet growing global biofuels demand.

Eni, on the contrary, is of the opinion that the use of rapeseed oil does not conflict with the stated aims for the project in Kenya; rather, "*it is complementary*". Eni's reaction to T&E's findings can be found in the main text and in the Annex.

# 1. Eni's biofuels plans in Africa

## 1.1 The Mattei plan

In early 2024 the Italian government launched a strategic initiative to deepen and reshape Italy's partnership with African countries. It was named after Enrico Mattei, the founder of Italian oil company Eni.

For the Italian government the Mattei Plan seeks to address multiple challenges: migration, climate change and economic development. In November 2025, Prime Minister Giorgia Meloni said:

> *"The Mattei Plan is not just an Italian initiative, but is now a strategy with a European and international scope, which looks far ahead and is gaining increasing support. Today the Mattei Plan is no longer an idea, but an operational reality that is producing concrete results."*

> "*This project marks the dawn of a new industry for Kenya, an industry where Kenya could become a world leader,*" said Makhtar Diop, IFC Managing Director.

One of the key pillars of the Mattei Plan is energy and within that biofuels production. In 2024, IFC and the Italian Climate Fund announced a $210 million investment in Eni S.p.A.'s Kenya subsidiary to expand the production and processing of advanced biofuels, supporting the decarbonisation of the global transport industry and the livelihoods of up to 200,000 small-scale Kenyan oilseed farmers.

## 1.2 No competition with food crops

The stated aim of the project is to grow non-edible oilseed crops like castor, croton, and cotton seeds on lands where growing crops is difficult, as not to compete with food supplies. Eni expects a production increase of oilseeds from 44,000 tons to 500,000 tons per year (the exact timeframe for this is unclear in the press release). Guido Brusco, Eni's Chief Operating Officer for Natural Resources said they aimed to produce 200,000 tonnes by 2026.

According to Eni's press release in 2022:

> *"The agri-hub will process castor, croton and cotton seeds to extract vegetable oil. These are sustainable, agri-feedstock raw materials that do not compete with the food supply chain because they come from crops that are resistant to aridity and suitable for growing on degraded soils, namely castor crops, seeds harvested from spontaneous plants (croton), and co-products of the cotton supply chain in a circular economy perspective."*

Interestingly, Eni's project in Kenya is the first certified as low-ILUC, i.e. a project with low indirect land-use change (ILUC) effects. The certification confirms compliance with EU

standards aimed at ensuring that biofuel production does not indirectly shift agricultural land intended for food and feed production towards biofuel production.

**EU biofuels policies: High hopes on low-ILUC biofuels**

Following the EU's first Renewable Energy Directive (RED) adopted in 2009 (since revised in 2018 and 2023), rising demand for biofuels based on food and feed crops contributed to the expansion of unsustainable feedstocks with high environmental costs, while also raising concerns about food security. By displacing food and feed production, these biofuels triggered indirect land-use change (ILUC) effects, including deforestation and peatland conversion, ultimately undermining climate benefits through increased greenhouse gas emissions.

In response, the 2018 revision of RED limited high-ILUC biofuels and required a total phase out of them by 2030. High-ILUC biofuels were determined by a Delegated Regulation introduced in 2019. Furthermore, the updated RED emphasised less damaging alternatives, encouraging the development of low-ILUC biofuels, which can use residues, waste, or crops grown on marginal or degraded land. These low-ILUC projects are considered more sustainable because they should minimise competition with food crops, reduce greenhouse gas emissions, and limit ecosystem disruption.

Biofuels from crops grown on severely degraded or contaminated land must show that the land was already unsuitable for food or feed production, that cultivation does not displace existing agricultural activities, and that it delivers additional biomass without causing land-use change elsewhere. Projects must also meet strict sustainability and greenhouse gas savings criteria, including proof of land status, traceability, and independent certification, to ensure genuine climate benefits and avoid the environmental and social impacts seen with food and feed crops biofuels.

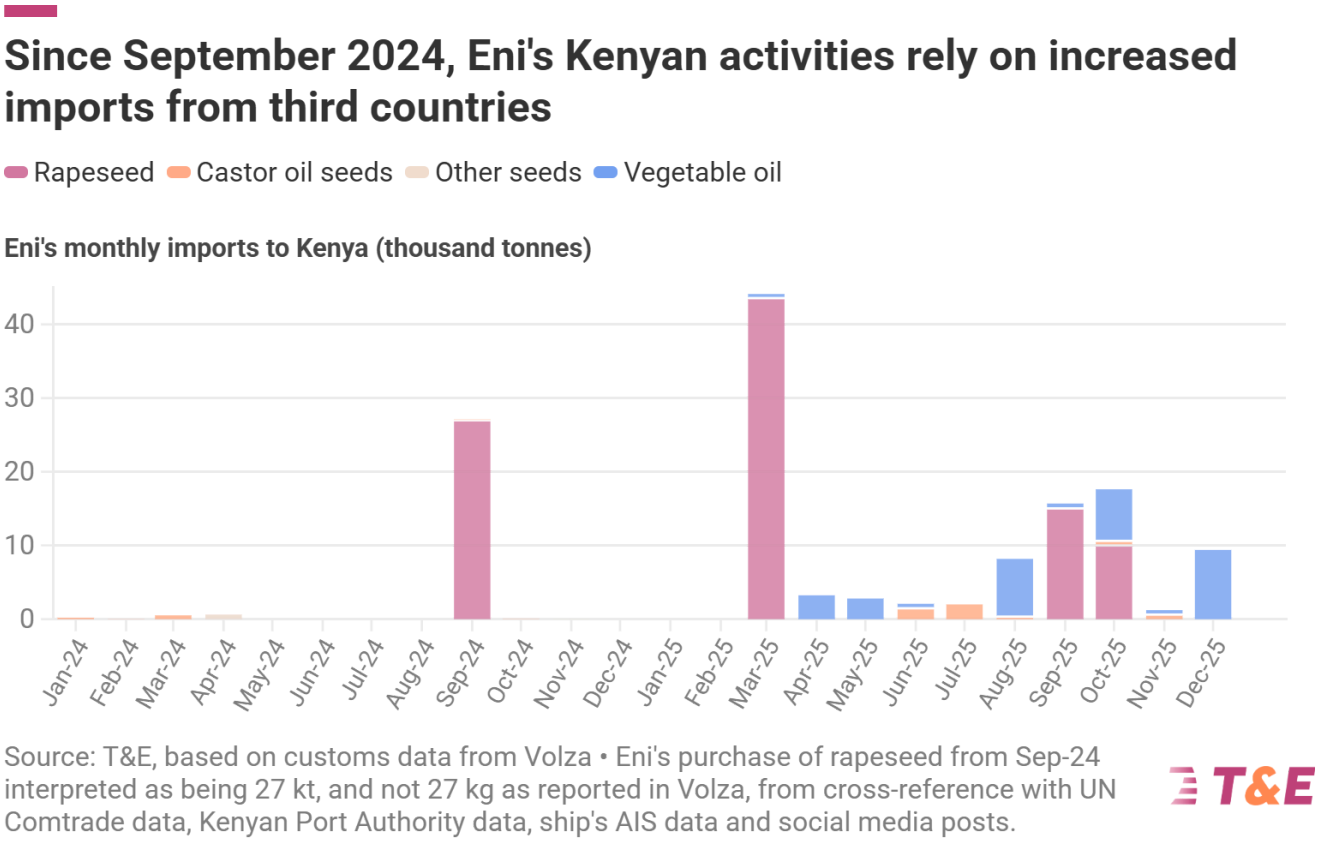
The EU now recognises crops grown on marginal or degraded land as an Annex IX feedstock, making them valid for double counting towards renewable energy targets. This incentivises these crops, positioning them as a key pillar of the EU's long-term transport decarbonisation strategy. Beyond the EU, the International Energy Agency has also highlighted these feedstocks as playing a decisive role in scaling up the global supply of sustainable fuels, estimating they could cover a significant share of transport energy needs without competing with agricultural land.

## 2. Significant rapeseed imports into Eni's subsidiaries in Kenya

T&E has looked at Eni's imports in Kenya using trade records from Volza, supplemented by other sources like the UN Comtrade data, data from the Kenyan Port Authority and vessels' AIS data. Through its Kenyan subsidiaries Eni Kenya BV and Eni Natural Energies Kenya EPZ Ltd, Volza custom data show that in early 2024, Eni imported relatively small amounts of castor seeds, notably from Brazil and India.

Since the second half of 2024, our analysis shows a new trend, with a significant increase in rapeseed imports from South Africa into Kenya.

Between September 2024 and December 2025, and based on the sources mentioned above, we estimate that shipments totalling nearly 100,000 tonnes of rapeseed seeds arrived from South Africa, with Eni's Kenyan subsidiaries listed as the consignees. In Volza's records, these rapeseed shipments are mentioned to originate from a South African company named Southern Oil Pty Limited. According to its ISCC certificate, Southern Oil supplies both rapeseed seeds and rapeseed oil.




Source: T&E, based on customs data from Volza • Eni's purchase of rapeseed from Sep-24 interpreted as being 27 kt, and not 27 kg as reported in Volza, from cross-reference with UN Comtrade data, Kenyan Port Authority data, ship's AIS data and social media posts.

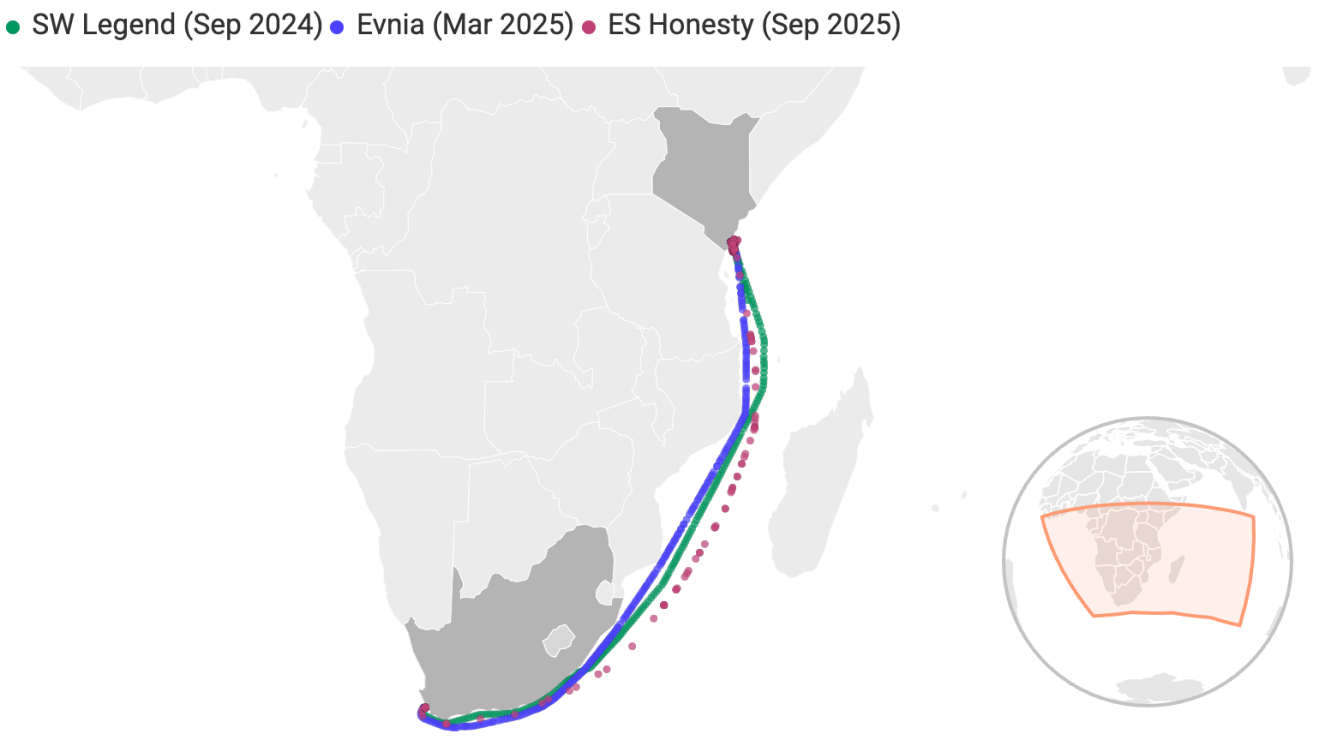
It also appears on Volza customs data that since October 2025, Eni has been buying thousands of large woven polypropylene (WPP) bags with "Rapeseed" printed on it, from Kenyan companies which might be used to transport seeds, potentially from bulk carriers to perhaps one of Eni's facilities in Wote, Makueni County or Bonje, Kwale County. When contacted, Eni

confirmed to T&E that it imported rapeseed seeds from South Africa and used them as one of the feedstock inputs within its Kenyan operations. However, Eni claimed to have used jumbo bags, not WPP bags, to move the seeds from bulk storage facilities to the agri-hubs.

Customs' data moreover show that Eni imported into Kenya diverse oil seed types on top of castor and rapeseed seeds, such as sunflower, safflower, brassica, camelina or crotalaria seeds from different countries. Given the small quantities involved, these seeds could be intended for sowing trials rather than oil extraction, suggesting that the oil company may be exploring alternative crop types to address potential shortcomings of its initial castor oil plan and to maintain its broader biofuels strategy in the country. Finally, Volza lists trade records of rapeseed cake and castor oil waste which might be by-products from the crushing facilities.

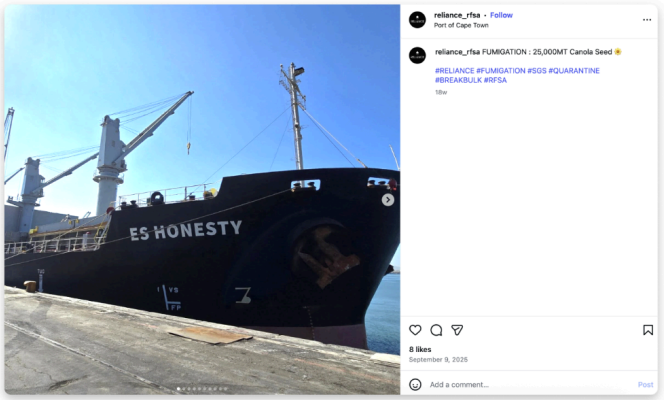
Furthermore, data from the Kenya Ports Authority confirm custom records from Volza and report three bulk carriers discharging rapeseed seeds in Mombasa in September 2024, March and September 2025. The vessels' AIS data also show their trip from Cape Town, South Africa to Mombasa, Kenya, where Eni's Kenyan subsidiaries are located, as can be seen below.

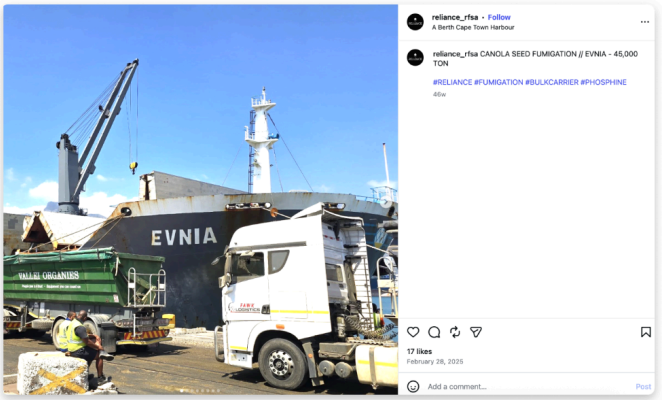
**Rapeseed flows from Southern Oil in Cape Town to Eni's Kenyan subsidiaries in Mombasa**

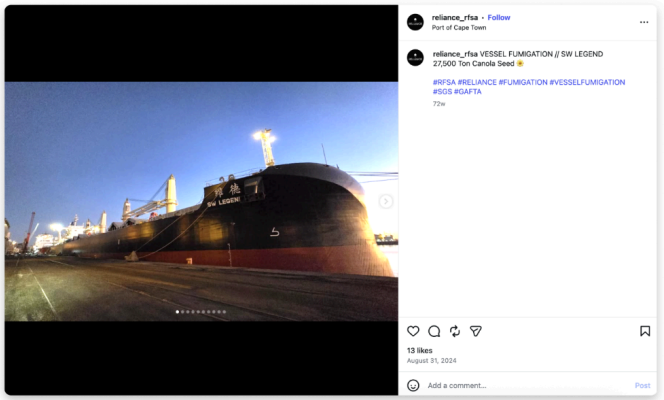



Source: T&E, based on AIS data from Marine Traffic

Finally, Instagram posts from the South African pest control company Reliance RFSA show pictures of the three vessels loaded with bulk rapeseed seeds in Cape Town, as well as mentioning the exact quantities carried by each ship.




This suggests Eni is not managing to cultivate the expected quantities of biomass in Kenya, as outlined in its industrial plans.

Eni, on the contrary, responded to say the project with local farmers is progressing according to the planned trajectory. It claims that this initiative does not conflict with the stated aims for the project in Kenya, rather, “it is complementary”. It also claims that rapeseed imported in Kenya has been cultivated in South Africa from traceable farms on severely degraded land. T&E has not been able to verify this, as it has not been made public and the supplier, Southern Oils does not appear to advertise that its crops are grown specifically on degraded land.

## 3. Exports from Kenya to Eni in Italy largely rapeseed oil in 2025

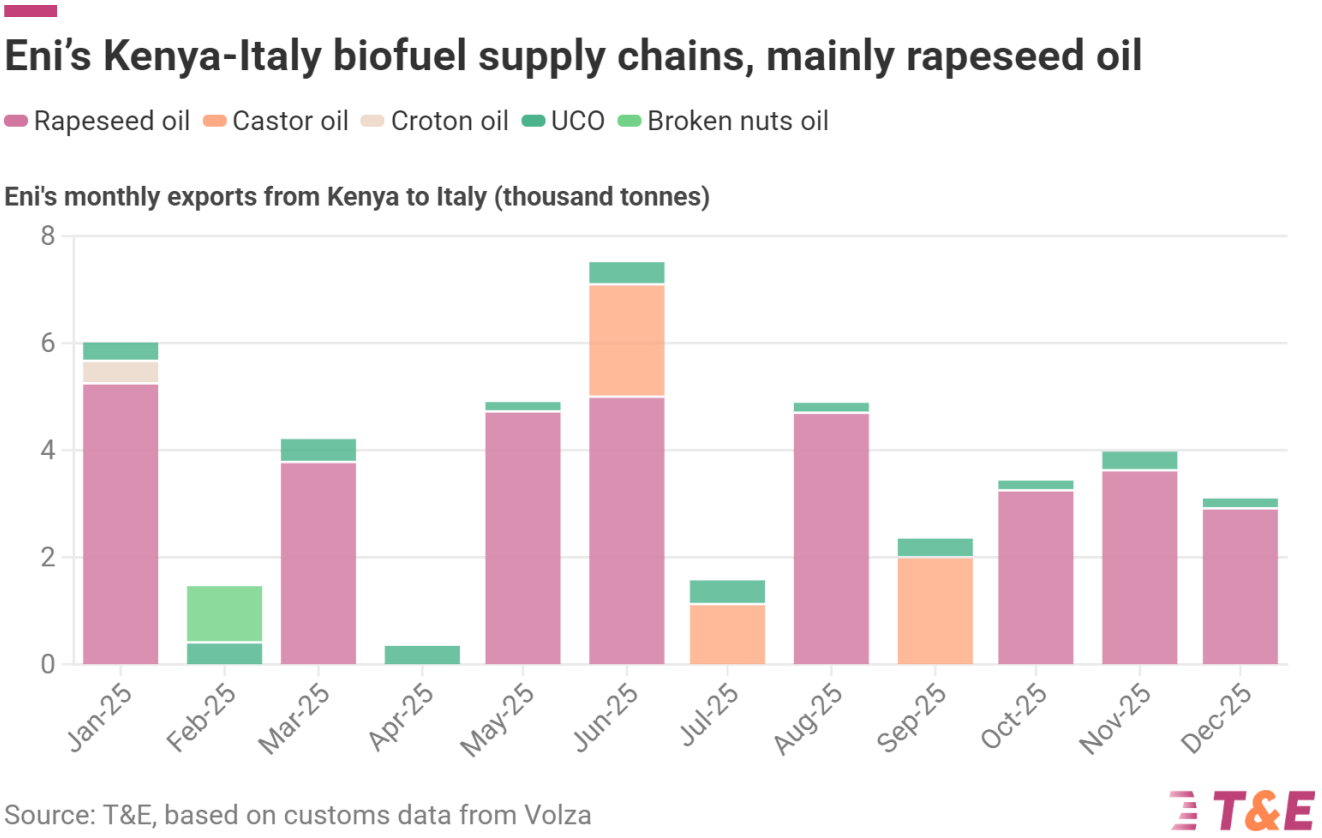
When we look at export records in Volza from Eni’s Kenyan subsidiaries to Eni’s refineries in Italy, we see that more than 30,000 tonnes were rapeseed oil between January and December 2025. We estimate that this represents around 80% of all oily feedstocks from Kenya supplying

the company's refineries in Gela and Venice over the period. More on our methodology and comparison with UN Comtrade data in the Annex.

Eni contested this, saying rapeseed oil does not represent 80% of its total exported oily feedstocks volumes in 2025 but only around 40%.

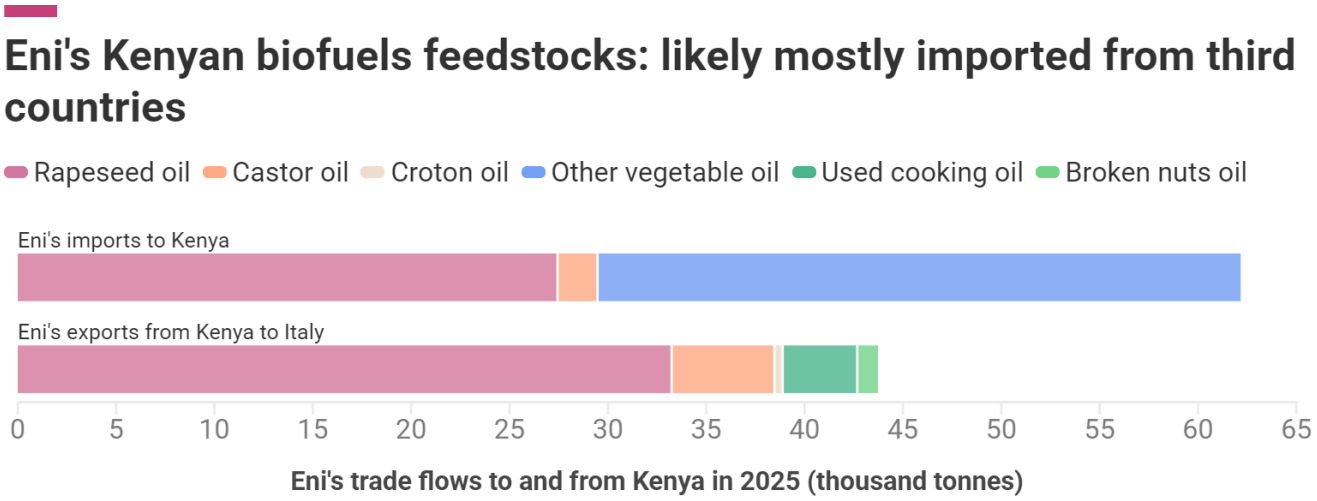
Eni claims that exported volumes do not correspond with total production volumes. Export figures are influenced by a range of operational factors, including logistics, industrial planning, shipping schedules and storage availability.

In more limited quantities, T&E's analysis shows regular used cooking oil volumes exported from Kenya, probably from local food businesses as advertised by Eni through its "*Fry responsibly, dispose accordingly*" or FREDA collection campaign in the country. On the other end, castor oil and croton oil only totalled around 5,000 tonnes exported to Italy in 2025. This appears to be similar to volumes reported by the Kenyan Agriculture and Food Authority for the previous year, suggesting a stagnation in castor oil seeds production. This report also mentions that "*Eni Company Ltd is the main buyer of castor beans in the country*".




When crushed, using standard industry yields of 40-50%, we estimate that Eni's rapeseed seeds imports to Kenya previously described in the graph on page 5 would correspond to around 38,000 - 49,000 tonnes of oil between Sep 2024 and November 2025, or 28,000 - 34,000 tonnes of oil in 2025 only.

Kenya domestically produced 15,000 tonnes of rapeseed in 2024. After processing, that would make roughly 6,000 - 8,000 tonnes of rapeseed oil domestically produced. If Kenya is exporting domestically grown food crops (or food crop oil) to Europe for biofuel, this would be highly problematic and would not align with Eni's stated aim of not competing with food production. T&E is unable to verify this.




Source: T&E, based on data from Volza. • Rapeseed and castor seeds imported by Eni to Kenya have been converted to oils assuming a seed to oil yield of 40%.

A previous investigation from T&E in 2024 sheds light on some of the difficulties Eni could be having in growing seed crops in Kenya. Farmers, who spoke to T&E, said that the labour required to grow, pick, shell and dry the castor beans was simply not worth the price Eni and their agent SAFA71 was offering for them. T&E obtained contracts between Makueni farmers and SAFA which showed prices of KSh25 being offered for a kilogram of deshelled castor beans and KSh7 per kilo of croton nuts in 2022. At these rates, a 10 kilogram crop of shelled castor beans would have earned a farmer just about €1.42.

T&E has not been able to reassess the current prices offered to farmers for this investigation.

## 3. Conclusions

Trade records and public data accessed by T&E show that Eni's Kenyan subsidiaries have been importing large quantities of rapeseed from South Africa. This data suggests that possibly after crushing it into oil, the company appears to be re-exporting significant volumes of rapeseed oil to Italy to be refined into biofuel.

This raises questions about whether the project is being presented in a way that aligns with its operational reality, and whether it is potentially misleading investors, as Eni explicitly set up its plants in Kenya to support local farmers to grow seed oils as part of the Italian government-backed Mattei Plan. Eni even received $135 million from the World Bank's

International Finance Corporation (IFC) and €75 million from the Italian Climate Fund to support the project.

The findings also raise major concerns that Eni has overpromised and is struggling to deliver on its high biofuels promises. Despite extensive marketing and stated commitments, the company appears unable, based on available trade data for 2024 and 2025, to meet its targets using locally produced advanced feedstocks. This not only raises questions about Eni's implementation of the Mattei Plan, but also casts doubt on the commercial viability of producing biofuels from crops grown on severely degraded land at scale. Eni contested this, claiming that its total production has grown from 2.5 kt in 2022, the project's start-up year, to 130 kt in 2024, with 2025 production exceeding the company's targets.

Yet, in response to these seeming shortfalls, Eni appears to have relied on imported first-generation feedstocks to fill the supply gap. If this is the case, serious questions arise about the sustainability of the project and its actual industrial, social, and climate potential. The findings not only put into question the economic and employment benefits for Kenyan farmers, but it raises questions over the viability of growing seed crops on marginal lands as a way to tackle climate change. This is crucial as funding for these projects largely comes from funds intended to prevent climate change.

## Annex 1: Eni's response to T&E's findings

Eni responded to T&E's report with the following:

*"This initiative does not conflict with the stated aims for the project in Kenya; rather, it is complementary. The project with local farmers is progressing according to the planned trajectory. Canola imported in Kenya has been cultivated in South Africa from traceable farms on severely degraded land."*

*"Eni does not confirm that its Kenyan activities have been relying on imported rapeseed from South Africa. Nevertheless, Eni confirms that imported canola seeds from South Africa have been used as one of the feedstock inputs within its Kenyan operations to support their continuity complementary to the agricultural seasonal cycles and it is consistent with the project's long-term objective of scaling local oilseed production compliant with EU Directives."*

When asked if Eni has been buying thousands of large woven polypropylene (WPP) bags with "Rapeseed" printed on it, from Kenyan companies, Eni responded:

*"The statement is not correct. To move the seeds from bulk storage facilities to the agri hubs, Eni used jumbo bags (not WWP), with no inscription on, bought on local markets."*

*"No, Eni does not dispute that the vessels carried out rapeseed shipments for Eni's activities in Kenya….. The use of imported rapeseed represents a partial and complementary input within Eni's broader Agri Feedstock strategy in Kenya."*

*"Rapeseed oil does not represent 80% of Eni Kenya's total exported oily feedstocks volumes in 2025, but only approximately 40%. It is also important to note that exported volumes do not correspond to total production volumes. Export figures are influenced by a range of operational factors, including logistics, industrial planning, shipping schedules and storage availability, and therefore do not provide a complete picture of feedstock sourcing or production patterns."*

On whether Eni was failing to produce large quantities of non-edible seed oils, Eni responded:

*Volumes of vegetable oil exported are not representative of total production volumes. Over the last years, Eni's agri feedstock portfolio has evolved through active and dynamic global management, with a strong focus on geographical diversification and diversification of the production mix. This strategy has strengthened the overall business model by reducing industrial risk and increasing resilience. Thanks to this approach, total production has grown from 2.5 kt in 2022, the project's start-up year, to 130 kt in 2024, and 2025 production exceeding the company's targets."*

## Annex 2: Methodological note

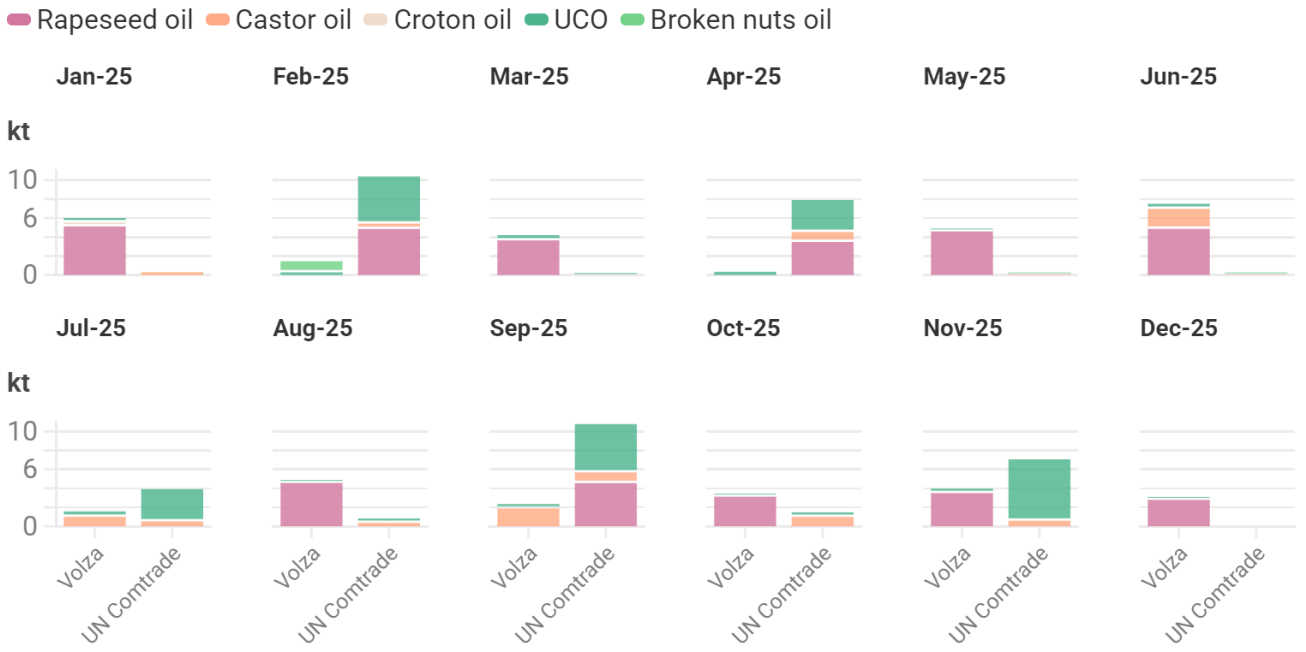
T&E has carefully analysed Kenyan customs records identified through Volza, and conservatively discarded potential shipment duplicates. For instance, where exact same quantities were reported several times at the same date. T&E acknowledges that additional shipments might be missing from Volza's aggregates of customs extracts.

Whenever possible, T&E cross-referenced Volza records with public sources such as the Kenyan Port Authority, UN Comtrade macro trade data, vessels' AIS data and social media posts.

Regarding Kenyan vegetable oil exports to Italy between January and December 2025, T&E's analysis indicates a partial mismatch between Volza's Kenyan export records to Italy and macro-level Italian import data from UN Comtrade. As shown below, total traded volumes between Kenya and Italy in Jan-Nov 2025 appear broadly consistent (41 kt in Volza vs 43 kt in UN Comtrade). However, the composition differs: lower quantities of rapeseed oil are reported in Italian import data (30 kt vs 13 kt), while higher volumes of UCO are recorded (4 kt vs 24 kt). Similar low volumes of castor oil were found in both sources (5 kt vs 6 kt).

### Annex: Differences between Volza Eni's Kenyan export records and Italian import trade data in 2025

Both datasets suggest a time lag between export and import records, along with a possible mismatch in HS code classification between rapeseed oil and used cooking oil flows




Source: T&E, based on Kenyan export data from Volza and Italian import trade data from UN Comtrade • HS codes 1514, 1515, and 1518 were assumed to correspond to rapeseed, castor, and used cooking oils in UN Comtrade, while Volza provided shipment descriptions.

Since Volza records explicitly identify rapeseed oil shipments involving Eni subsidiaries, it is possible that the corresponding HS codes were interpreted differently in the less granular Italian trade data. Volza's export data also correspond to the potential volumes of rapeseed oil that could be extracted from the imported rapeseed seeds from South Africa. Additionally, the larger and less frequent UCO shipments reflected in UN Comtrade appear less consistent with a regular waste oil collection framework such as that organised by Eni in Kenya, although they cannot be ruled out.

In any case, both datasets point to substantial volumes of rapeseed oil being exported from Kenya to Italy in 2025.

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## Further information

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