T&E

BRIEFING

Biofuels in the EU post-2030 renewable energy framework

A deep-dive exploring the impacts of potential EU biofuels policy scenarios

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Executive Summary

The discussion around the future of the Renewable Energy Directive (REDIII) is underway as the European Commission devises what role renewable energy will play in transport in the post-2030 energy framework. As the political priorities of the EU focus on energy independence and domestic industry, there is a renewed push for more first generation food and feed crop biofuels in the European transport energy mix. However, these biofuels can have adverse impacts on the climate, environment and food supply chains. To address these concerns, T&E has modelled three different policy scenarios to demonstrate the consequences of varying outcomes and their potential impact on the climate, environment and food security.

Key findings

Crop cap

The current EU cap already allows 72% more crop biofuels to be consumed within the EU's transport energy mix than it currently uses. However, this would impact land use emissions and food security.

Land use

By 2040, crop biofuels could use up to 17.7 Mha depending on the crop cap scenario, four times today's land use, and emit 23% more than fossil fuels due to land-use change.

Food security

The land needed for EU-grown biofuels feedstocks could have produced up to 27 Mt of grain this year, 1.6 times what the summer's heatwaves destroyed.

Our findings show that the current cap on first-generation biofuels set by the Renewable Energy Directive (RED III) can allow 72% more food and feed crop biofuels to be used in the EU transport energy mix, compared to what the bloc consumed in 2024. However, when accounting for indirect land use change, emissions from first generation biofuels current consumption already reach nearly 43 MtCO2e, about 23% more than the fossil fuels they replace.

When safeguards take the same form as stipulated in RED III and other key transport regulations, food and feed crop biofuel volumes, land-use area and emissions could all potentially double by 2040, emitting an equivalent to more than 5 million diesel cars.

In an unfavourable scenario, whereby the cap on first generation biofuels is harmonised at 7% across Member States' transport sectors, volumes, land use and emissions would almost triple. In a worst case scenario, where the cap on first generation biofuels is expanded beyond 7%, the negative consequences would be far heavier. We have used 10% as an example: volumes, land use and emissions could be four times today's levels in 2040. Land dedicated to biofuels could reach 17.7 Mha, 18% of the EU arable land, an area larger than Greece, and emissions would exceed those of fossil fuels by 33 $MtCO_2e$.

For advanced and waste biofuels, which are limited in supply, we show that the road sector is currently overconsuming available feedstocks, which should be directed towards sectors that cannot be electrified, particularly aviation. Furthermore, recent cases of fraud have highlighted the risks of relying on third country exports, making the case that all palm oil derivatives should be phased out and that effective safeguards should be put in place to allow for the most sustainable feedstocks.

Recommendations

T&E, alongside CAN Europe, WWF and over 30 European renewable industry associations, recommends the European Union commits to the stability of RED III and refrain from reopening this policy during the negotiation of the post-2030 energy architecture.

Despite containing harmful policy incentives for bioenergy, RED has driven the deployment of genuine sustainable renewables in the last decades. Not reopening the RED at this point in time is the **simplest, most rigorous and timely pathway to ensure regulatory stability for the continued uptake of these technologies.**

The Renewable Energy Directive has been revised four times in as many years. The cumulative effect is that the new provisions included since 2023 are still yet to be implemented in most EU Member States. This regulatory instability undermines the investment certainty essential to meeting Europe's climate and energy security objectives. Investment in renewable energy and associated infrastructure depends on predictable regulatory frameworks. Financial institutions require clarity on targets, permitting procedures, grid and network access rules, auction mechanisms to underwrite long-term deployment and effective power purchase and heat purchase agreement frameworks.

What Europe needs is rigorous implementation of these rules across all Member States, not more legislative revision. To accelerate this, the Commission should:

- Enforce **the most effective existing RED provisions**, (namely direct electrification and renewable e-fuels, rather than biofuels) through conditionality of EU funds.
- Provide technical assistance to accelerate Member State capacity for permitting and grid planning to **encourage the uptake of renewable electricity** within the EU's transport energy mix.

A renewed push for food and feed crop biofuels

The European Union has spent years fine-tuning its biofuels policies to avoid the negative impacts that dedicating food for fuel has on the climate, environment and food security. Now, as pressure intensifies to achieve renewable energy targets and EU energy independence, there is a growing demand to increase Member States' consumption of first generation biofuels.

1.1 A regressive U-turn

Since the first edition of the Renewable Energy Directive (RED) was adopted in 2009, EU policy has long-acknowledged the complicated nexus between biofuels, the environment and the food supply chain. Significant research has since been undertaken to devise a policy that imposes the least amount of pressure on food security and land use. As a result, RED caps the amount of food and feed crop biofuels, also known as first generation biofuels, that Member States' can count towards renewable energy targets in transport.

The future of this important safeguard is now under threat as the EU devises its post-2030 energy framework. Several industry stakeholders are calling for a regressive U-turn to see this cap reconsidered. To address the issue, T&E has combined historical volumes of first generation biofuels in the EU transport energy mix, and modeled three varying scenarios to demonstrate the role of biofuels in the future transport energy framework, and what that could mean for land use and food security.

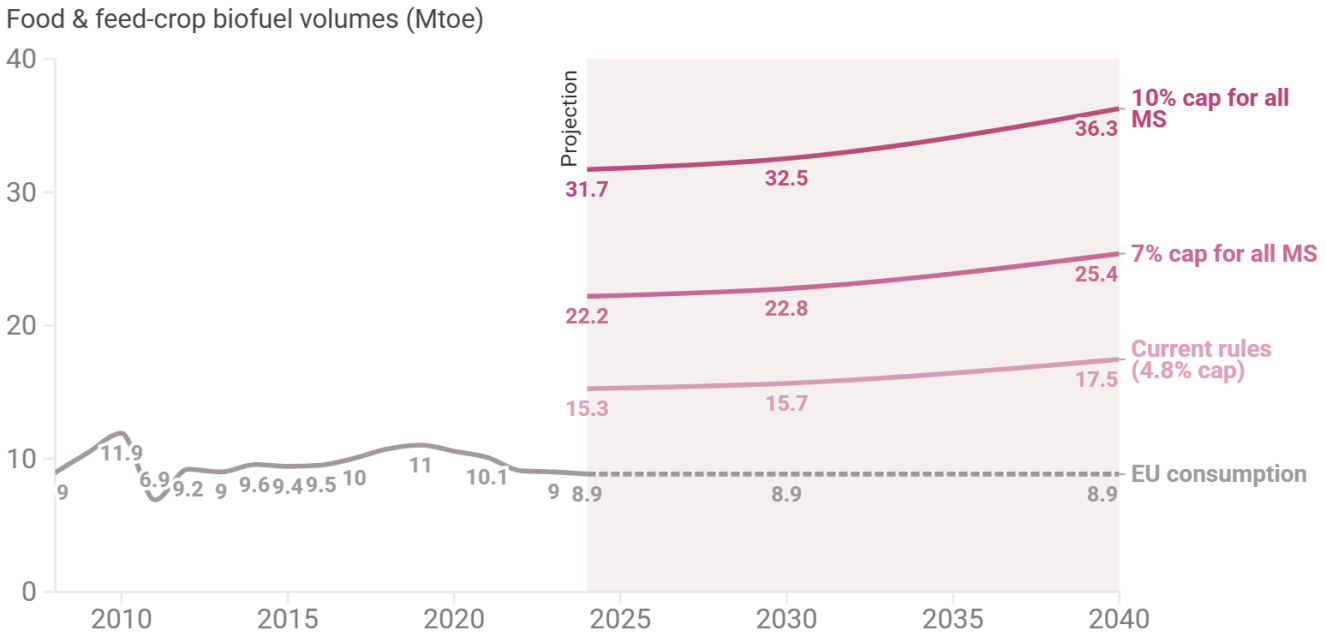
Currently, each EU Member State's cap on food and feed crop biofuels is tied to their 2020 usage level. A country's cap can never go above 7%, regardless of past usage. Member States are allowed a flexibility of 1% above their 2020 share or, if their 2020 share is below 1%, a maximum of 2% of the final consumption of energy. Member States may also set a lower limit on first generation biofuels or disregard any contribution from them, reducing their overall renewable energy target for transport.

In 2020, EU Member States consumed 10.6 Mtoe of first generation biofuels, making up about 3.8% of the EU's total transport energy. When adding the above flexibility allowances, this gives a maximum cap ceiling of about 4.8% under current RED rules. Even under these current rules, use is far below the ceiling: **in 2024, food and feed crop biofuels made up just 2.8% of transport energy**, **leaving room for 72% more first generation biofuels eligible in the EU transport energy mix.** However, this would negatively impact land use emissions and food security.

One scenario currently being explored for the post-2030 framework applies the 7% maximum uniformly across all Member States, similar to how the crop cap was first introduced in 2015. It would allow the consumption of almost three times the current use of food and feed crop biofuels by 2040. A worst-case scenario in which the cap is set at 10% in all Member States, as is being called for by industry lobbies, would allow a ceiling of more than four times the current use.

A 7% harmonised cap more than doubles the ceiling for food- & feed-crop biofuels

Even under current rules, the 2024 cap allows 72% more food & feed-crop biofuels than are actually used, and almost twice as much by 2040.



Source: T&E modeling under European Green Deal policies

The above analysis shows that the EU biofuels policy already has a ceiling that allows **15.3 Mtoe of first generation biofuels to count towards renewable energy targets today, and up to 17.5 Mtoe by 2040**. However, this contribution of first generation biofuels would have a limited impact on quelling carbon emissions when accounting land use change, as shown below, while also increasing pressure on land use, biodiversity, fertiliser demand and food and water security. These different scenarios show that crop biofuels could potentially make up a much larger share of the total transport energy mix by 2040, compared to today.

1.2 Land is not free

The fundamental problem with increasing EU consumption of food and feed crop biofuels is the opportunity cost that it entails. Land that could be dedicated to growing food for human consumption or

naturally storing carbon dioxide and upholding biodiversity is instead redirected to growing monocultures of crops for biofuels and animal feed.

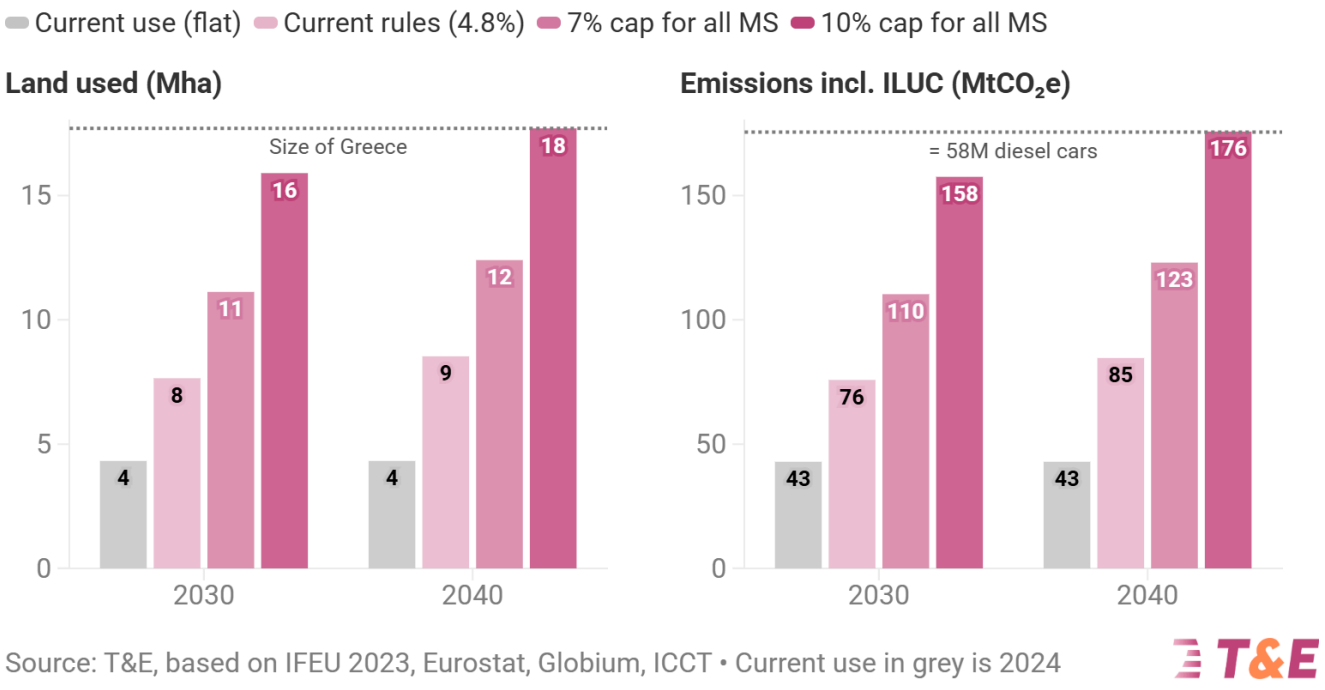
The current amount of food and feed crop biofuels consumed in the EU requires about 4.3 million hectares (Mha) of land worldwide for energy consumption, excluding the share used for animal feed by-products. This is the equivalent to around 4.4% of EU arable land, an area bigger than the size of Denmark.

The RED's life-cycle assessment (LCA) for biofuels accounts emissions from land use change as zero by default, as it is considered that no new agricultural land is required to grow these biofuels. Therefore, the EU's current consumption of first generation biofuels can be touted, on paper, as saving around 18 $MtCO_2e$ per year, or about 52% direct emissions when compared to fossil fuels, based on RED's typical emission factors.

However, things look much worse once indirect land use change (ILUC) is taken into account. Using values from the EU's GLOBIOM modelling, emissions from first generation biofuels reach nearly **43 $MtCO_2e$, about 23% more than the fossil fuels they replace**.

Higher caps mean more land and more emissions

By 2040, the caps would allow nearly 2 to 4 times today's land use and emissions from food & feed-crop biofuels.



Source: T&E, based on IFEU 2023, Eurostat, Globium, ICCT • Current use in grey is 2024

Even under current RED rules, the cap leaves room for food and feed crop biofuels to almost double their footprint in the EU by 2040, which would allow emissions reach up to **85 $MtCO_2e$ per year, 16 $MtCO_2e$ more** than if the same energy came from fossil fuels. That surplus alone is equivalent to around 5 million more diesel cars on EU roads by 2040.

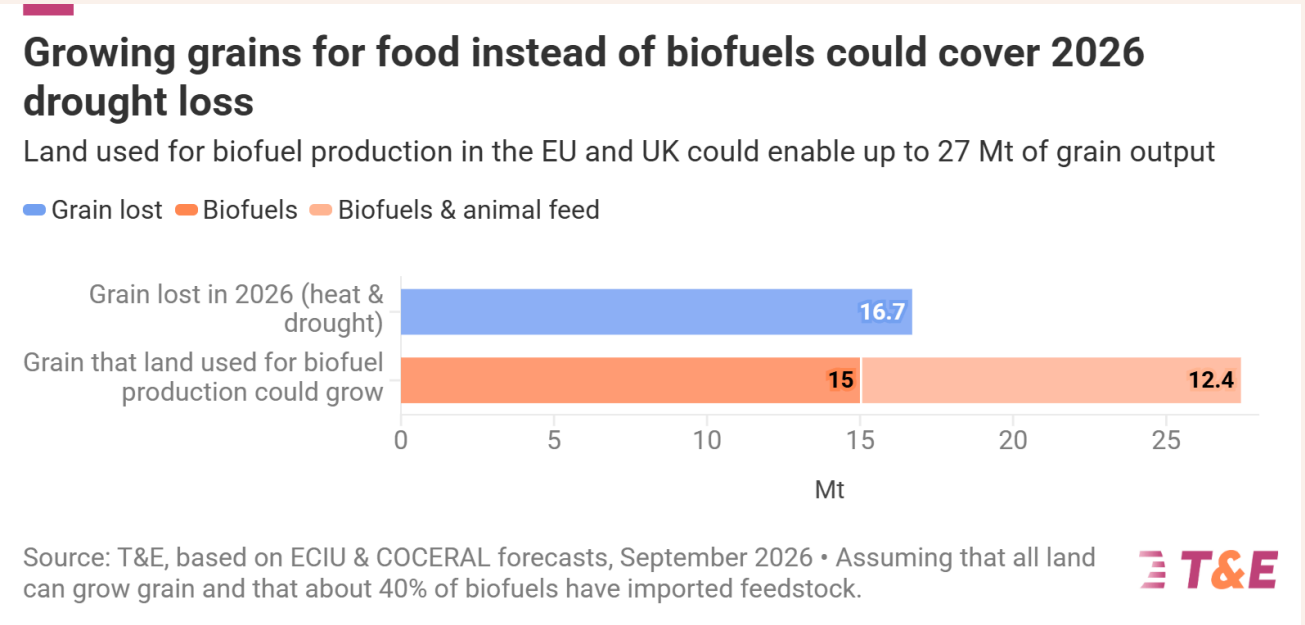
A 7% harmonisation would allow almost three times today's land use and emissions by 2040, while the worst case scenario, whereby the crop cap is harmonised at 10%, land use demand and emissions could more than quadruple by 2040. As much as 18 Mha, nearly a fifth of EU arable land – an area larger than Greece – could be dedicated to growing crops for biofuels, causing emissions to climb to 176 $MtCO_2e$ per year when accounting for ILUC, 33 $MtCO_2e$ more than the fossil fuels they are meant to replace.

A better use of land

Summer 2026 was one of the hottest on record in Europe, and the combination of heat and drought left the region's grain harvest at its smallest in at least a decade, worth around €3.2 billion in lost production. In its latest report, Energy & Climate Intelligence Unit notes that the grain lost since June is equivalent to the entire harvest currently forecast for Italy, Belgium and the Netherlands combined.

In comparison, the roughly 9.6 Mha of agricultural land required to grow this amount of first-generation crop biofuels consumed in the EU and UK (including co-products) could produce over 27 Mt of food and feed grains such as wheat and corn, exceeding the harvest shortfall caused by this summer's extreme weather.

In such crises, an emergency brake mechanism on crop-based biofuels would let the EU use that land to grow food instead. Temporarily suspending biofuel mandates could rapidly divert existing harvests back into the food system while allowing farmers to shift future planting cycles toward essential food production.



1.3 Deepening EU reliance on imports

While a "Made in Europe" ambition has considerable political traction in the post-2030 energy debate, the reality is that EU biofuels production will still be reliant on highly competitive, imported feedstocks and

fertiliser inputs from the third countries. For instance, market data from Quantum Commodity Intelligence shows that since early 2026, US ethanol has traded on global markets at a 40% discount compared to EU ARA prices.

First-generation biofuels also rely on fossil-fuel-based fertilisers, leaving them vulnerable to global price shocks that drive up production costs. T&E research shows that EU biofuel feedstocks consume 8% of the bloc's fertiliser supply to meet just 3% of transport energy demand. Expanding this demand would only intensify competition for fertiliser nutrients between food and energy crops.

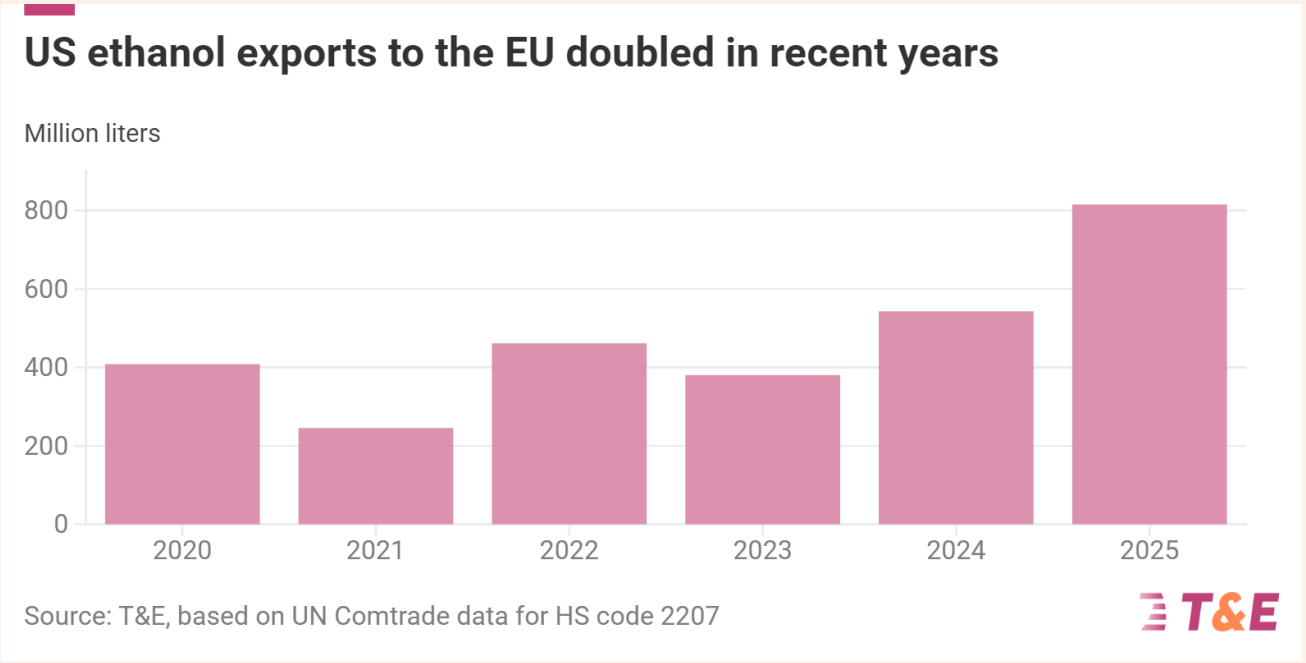
As agricultural and biofuel superpowers ramp up their production of ethanol and biodiesel, the EU biofuels industry will have to compete with their considerable refining capacity. The US and Brazil have ethanol refining capacities deemed to be ten times and eight times larger than the EU's, respectively. Both countries have dramatically increased their exports to the EU in recent years. In the case of the USA, the US Department of Agriculture has made a specific action of gaining increased market share for ethanol in export markets, a dark foreboding for both ethanol and biodiesel imports in the EU.

Increasing the biofuel cap for food and feed crops exposes the EU to further import reliance

Whether sourced from Indonesian palm oil, Argentinian soy, US corn, Australian rapeseed, Ukrainian sunflower oil, or Chinese used cooking oil (UCO), EU biofuel policies have historically driven imports of both raw feedstocks and refined biofuels. Based on data from the largest EU markets, we estimate that the bloc relies on imported materials for roughly half of its biofuels consumption.

Agricultural powerhouses are intensifying their push for global biofuel expansion. Beyond raising their domestic mandates, these countries are actively seeking new export outlets for their massive agricultural yields and to shape foreign fuel regulations. As shown in the chart below, US corn ethanol exports to the EU have doubled in recent years, now accounting for approximately 13% of total EU ethanol consumption.

Another example is the recently implemented EU-Mercosur trade agreement that grants preferential access to ethanol from South America to the EU market, with a 450 kt duty-free quota for industrial applications and a 200 kt reduced-duty quota for other sectors, including transport fuels.



1.4 The European Parliament's soy biofuels blunder

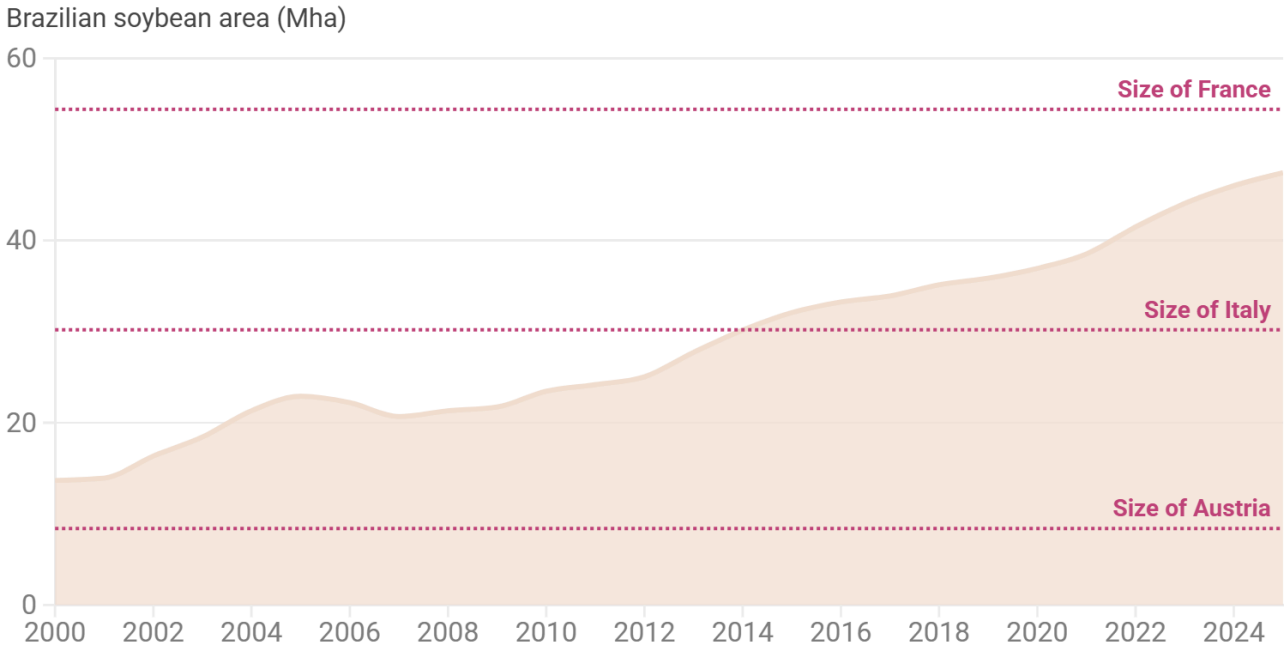
Following a July vote, the European Parliament blocked the revision of Delegated Regulation (EU) 2019/807, which aimed to phase out soy-based biofuels from counting as renewable energy by 2030. According to a letter penned by Energy Commissioner Dan Jørgensen, this decision leaves the EU vulnerable to $5.6 billion in annual retaliation penalties from Indonesia and Malaysia for breaching its legal obligation to update the ILUC regulation. The EU previously won a WTO trade dispute against Indonesia and Malaysia that allowed the bloc to keep a phase out of palm oil biofuels – of which Indonesia and Malaysia are the world's biggest producers – provided it took a scientific and consistent approach to what it considers high deforestation risk feedstocks. Treating soy more favourably than palm oil within the same high-ILUC-risk category means this condition will now not be met, leaving the EU open to litigative action from these palm oil powerhouses.

Both palm and soy are primary drivers of tropical deforestation and land clearance. Treating either of these feedstocks as sustainable fossil fuel alternatives severely underestimates their toll on climate, ecosystems, and food security. In Brazil alone, land allocated to soy production now surpasses the total area of most European nations, causing severe destruction across the Amazon rainforest and the Cerrado savannah.

The EU must ensure that **complete phase out of high ILUC-risk biofuels feedstocks** remains in place in the post-2030 energy framework, including biofuels that are made from soy.

Brazilian soy fields are now larger than most European countries

The country's cultivated area expanded nearly fourfold over the last 25 years, mainly in the Cerrado biome. This also indirectly impacts deforestation in the Amazon biome, due to the resulting displacement of cattle herds.



Source: T&E, based on data from the Brazilian public agency CONAB

Advanced biofuels in cars? What a waste!

Advanced and waste biofuels, or second generation biofuels, can offer some benefit but will not be enough to decarbonise the EU transport sector. Instead, sustainable supplies of these limited feedstocks should be directed towards non-road sectors, such as aviation and long-distance shipping, where electrification is difficult.

2.1 Limited availability

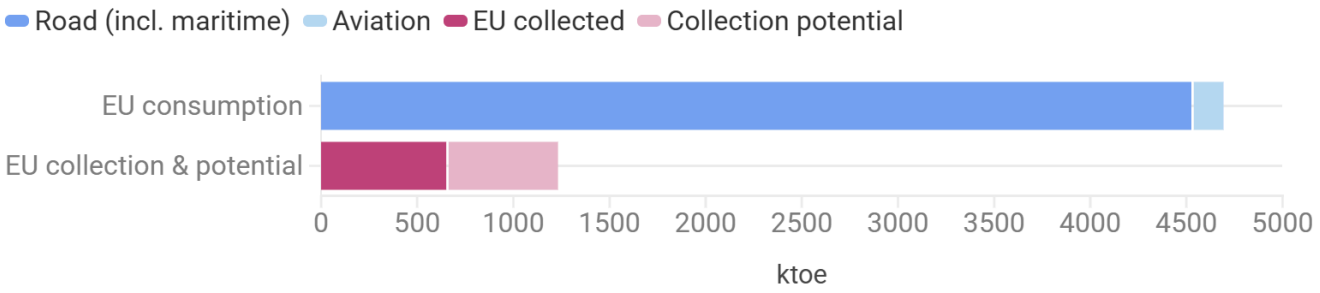
RED currently incentivises second generation over first generation biofuels by double-counting their contribution towards transport energy targets. For Annex IX Part A, biofuels dedicated to aviation or shipping modes are further multiplied by 1.2. While this policy incentive was introduced to direct EU biofuel consumption away from damaging first generation biofuels and to sectors that cannot be easily electrified, it has created an imbalance between third country imports and EU-produced biofuels. This is the result of an artificially inflated market value for waste biofuels and a limited availability of domestic second generation feedstocks.

The EU's domestic waste oil collection currently yields around 1 Mtoe of biofuels per year, mostly used cooking oil and animal fats categories 1 & 2. When taking unrealised EU potential into account, this can be expected to grow to a maximum of 1.8 Mtoe by 2040. Supplemented by a potential domestic supply of around 8 Mtoe of advanced biofuels with limited sustainability risks, the EU could expect to have a domestic supply of approximately 10 Mtoe of sustainable advanced and waste biofuels. In addition, if grown under strict sustainable safeguards, the EU could also produce a maximum of 1.5 Mtoe from oily intermediate and severely degraded land crops.

Under current ReFuelEU Aviation and FuelEU Maritime regulations, sustainable aviation fuel (SAF) and maritime fuel targets cannot be achieved using first generation biofuels, a safeguard that should stay in place. Therefore, second generation biofuels – with strong sustainability safeguards – are more suitable for these two hard-to-abate sectors, rather than road transport, which can be more easily electrified. **However, second generation biofuels make up 46% of the biofuels used in road transport – 97% of all the second generation biofuels consumed in the EU.**

UCO-based biofuels still go mostly to road transport, and 86% of the UCO is imported

EU, 2024



Source: T&E, based on Stratas Advisors, most likely including Industrial waste oils (Annex IX Part A) and EASA

2.2 Issue of fraud, third country competition and deforestation

The EU relies on imports for its supply of second generation biofuels. This has largely been driven by favourable incentives for these biofuels with no protection from foreign markets, which are not subjected to the same scrutiny as domestic ones, nor are they within the legal mandate of European authorities to inspect them. This reliance, compounded by poor regulatory oversight and monitoring capability has left the bloc vulnerable to fraud, whereby second generation biofuels can be either mislabelled or the fuel itself adulterated with first generation feedstocks. The uniform incentivisation of these biofuels has placed EU-collection capacity in direct competition with third countries.

Fraud concerns are also connected to land use change issues due to the type of feedstocks that are suspected of being mislabelled. Historical cases can already attest to this, such as shipments of first generation soy oil biofuels being mislabeled as used cooking oil (UCO) (an Annex IX Part B) and first generation palm oil biofuels being mislabeled as Palm Oil Mill Effluent (POME) (Annex IX Part A). Both palm and soy have been shown to have considerable impacts on land use change and deforestation, according to the EU Commission's recent report on the status of production expansion of relevant food and feed crops worldwide.

Indonesian POME exports case study

Since the EU phase out of palm oil was introduced in 2019, consumption of imported Palm Oil Mill Effluent (POME) immediately began to rise. POME, a wastewater residue from palm oil milling, has been identified by the European Commission as having a high overall risk of fraud.

T&E analysis showed that there was likely more POME being consumed by Member States than was globally available. Soon afterwards, multiple arrests were made in Indonesia, the leading supplier of POME to Europe, with 11 people arrested suspected of changing HS custom codes to disguise crude palm oil as POME. The companies involved in the palm oil fraud probe were shown to have supplied

European fuel producers, including Italian oil major Eni and Finnish sustainable aviation fuel leader Neste.

As a case study, this fraud scandal brings to light the vulnerability that exists when relying on hard-to-verify biofuels. Significant improvements are needed to rectify this, however, questions should still be raised over the eligibility of palm oil derivatives. Considering the palm oil industry's direct connection to the devastating ongoing deforestation projects in Indonesia, combined with this case of fraud, a phase out of all palm oil derivatives should be implemented to further eliminate any case of fraud that can be directly connected to deforestation.



2.3 Certification, Union Database and the EU's new favourite feedstock

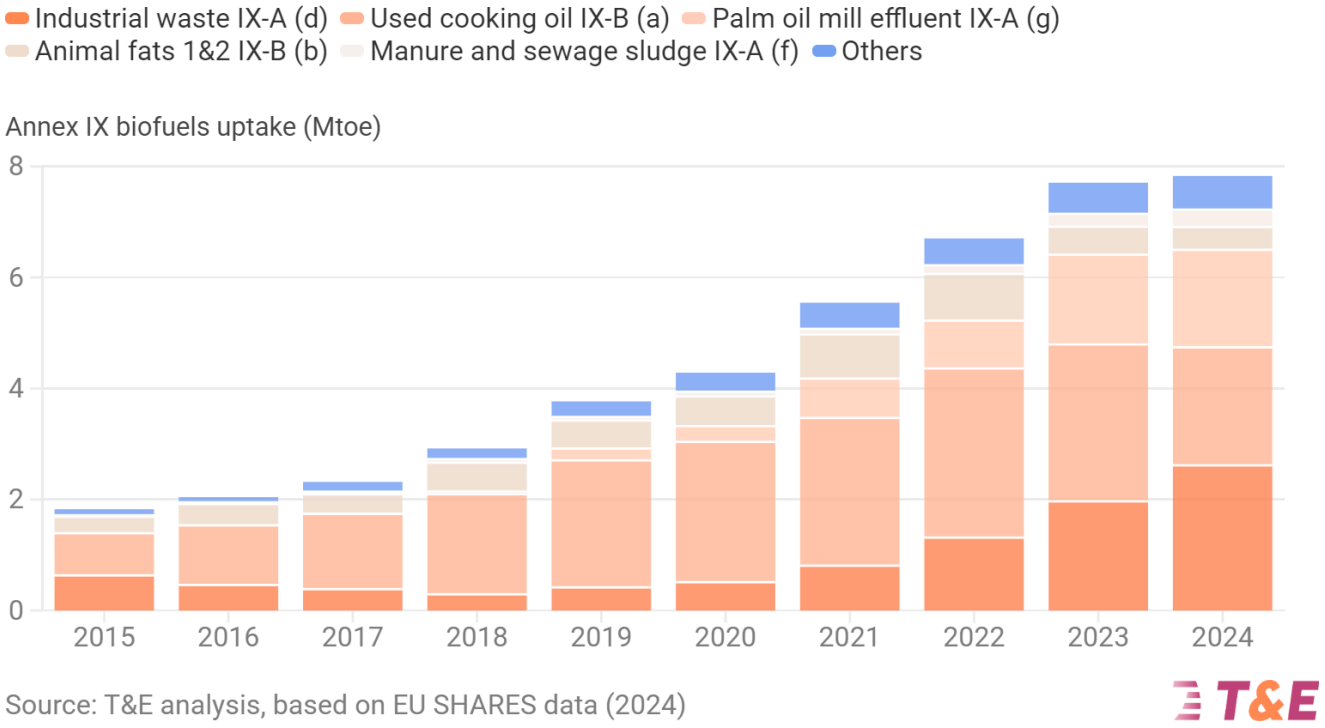
The framework for certifying biofuels is heavily reliant on independent certification companies carrying out audits on behalf of private Voluntary Schemes. These audits create a paper trail of certificates that are predominantly based on company records, rather than physical testing of the fuels. Persistent delays in the rollout of the Union Database (UDB) for biofuels, a centralised EU system that digitally tracks biofuels transactions, has made it difficult for the European Commission and Member States to have full oversight of the supply chain and transactions of certificates or fuels. A key benefit of the UDB in fighting fraud is supposed to be its ability to pinpoint exactly where mislabelling is suspected to be happening, and save resources in searching for such fraud.

Recent trends in EU waste biofuels consumption have shown a concerning trend. A notable reduction in the consumption of UCO, an Annex IX Part B feedstock subject to a 1.7% cap, in favour of industrial food waste, an Annex IX Part A feedstock that is not capped, has raised questions about its legitimacy and the monitoring of the certification system underlying it.

In light of the alleged mislabelling of feedstocks, as in the aforementioned Indonesian POME case, the European Commission and Member States must continue to push for increased user compliance of the UDB, as well as increased dedicated resources for monitoring capacity of industry supply chains. This will remain critical in the post-2030 energy framework, as advanced and waste biofuels will continue to play a role in transport, particularly aviation, combined with a considerable increase in RFNBOs, which are also included within the scope of the UDB.

With advanced and waste biofuels now over 40% of the EU mix, few feedstocks make up most volumes

Industrial waste now accounts for a third of Annex IX biofuel feedstocks, overtaking the historical leader, UCO



Source: T&E analysis, based on EU SHARES data (2024)

03 Conclusion

Resilience should not mean regression

The EU is considering a resilience or energy-security objective for the post-2030 framework alongside the renewable energy and efficiency targets. However, an EU resilience target is only as effective as its definition. If resilience is defined too broadly, it risks opening the floodgates for established interests, including crop biofuels that swap a dependency on imported oil for a dependency on imported biofuels, feedstocks and fertilisers, all the while undermining climate emissions targets and threatening food supplies.

3.1 Policy recommendations

T&E, alongside CAN Europe, WWF and over 30 European renewable industry associations, recommends the European Union commits to the stability of RED III and refrain from reopening this legislative policy during the negotiation of the post-2030 energy architecture.

Despite some policy incentives for bioenergy, RED has driven the deployment of genuine sustainable renewables in the last decades. Not reopening the RED is the **simplest, most rigorous and timely pathway to ensure regulatory stability.**

The Renewable Energy Directive has been revised four times in as many years. The cumulative effect is that the new provisions included since 2023 are still yet to be implemented in most EU Member States. This regulatory instability undermines the investment certainty essential to meeting Europe's climate and energy security objectives. Investment in renewable energy and associated infrastructure depends on predictable regulatory frameworks. Financial institutions require clarity on targets, permitting procedures, grid and network access rules, auction mechanisms to underwrite long-term deployment and effective power purchase and heat purchase agreement frameworks.

What Europe needs is rigorous implementation of these rules across all Member States, not more legislative revision. To accelerate this, T&E recommends the EU to:

1. Enforce **the most effective existing RED provisions**, (namely direct electrification and renewable e-fuels, rather than biofuels) through conditionality of EU funds.
2. Provide technical assistance to accelerate Member State capacity for permitting and grid planning to **encourage the uptake of renewable electricity** within the EU's transport energy mix.

For its long-term ambitions regarding biofuels, the EU should aspire to:

1. **Totally phase out first generation biofuels** from EU renewable energy targets by accelerating electrification and increasing investments in renewable e-fuels to enhance energy resilience.

2. **Equip biofuel policies with an "emergency brake" mechanism** that can immediately cancel first generation biofuels' required contributions to mandates during the aforementioned phase out, to mitigate the direct inflationary impact that they have on food security

3. **Uphold the exclusion of food and feed based biofuels** from compliance under the ReFuelEU Aviation and FuelEU Maritime regulations.

4. **Do not rollback the EU's high ILUC approach** or make exceptions for individual feedstocks based on origin-specific criteria.

5. **Incentivise EU-domestic advanced and waste feedstocks** that meet exemplary sustainability standards over imports.

6. **Improve monitoring capacity of the EU and Member States over the certification framework** and ramp up Union Database rollout to improve supply chain transparency and oversight.

7. **Total phase out of all palm oil derivative feedstocks,** from renewable energy targets, thus limiting capital from being directed towards the deforestation-driving palm oil industry.

Methodology

Modelling of the different cap scenarios

To model the different food and feed crops based biofuels cap scenarios, we have used our post-2030 projected EU transport energy demand, which is a bottom-up approach aggregating each individual transport mode. For the "current rules", "7% cap for all Member states" and "10% cap for all member states" scenarios, we used the projected demand based on adopted Green Deal policies, including the historical car CO_2 standard aiming at 100% electric vehicles sales in 2035. However, ongoing revisions of cars and trucks standards might lower the EU electrification ambition, and end up having impacts on biofuels demand. Such impacts have not been modelled here.

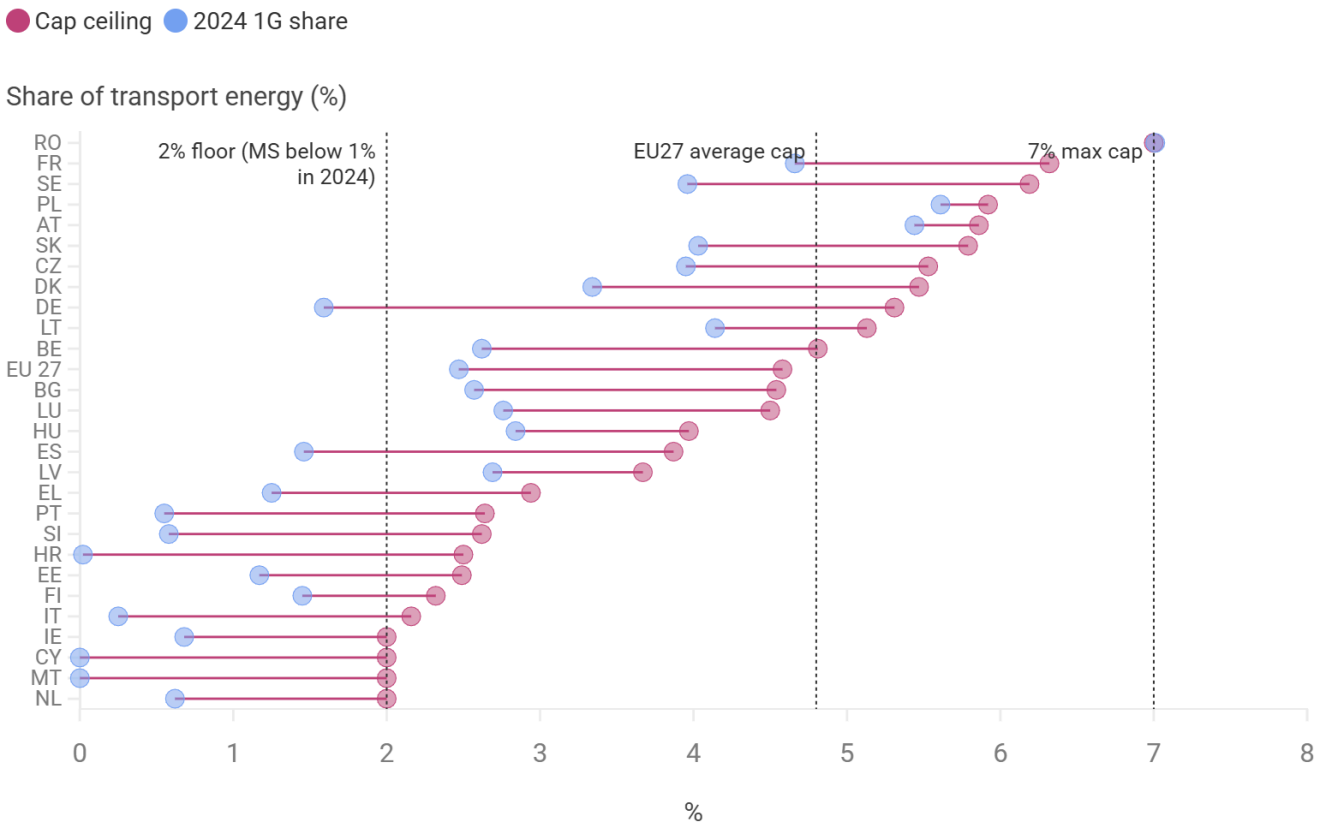
Our modeling of the current cap involves, as described in the RED, dividing the share of food and feed crop biofuel volume in 2020 by the RES-T denominator *(including* multipliers, as per official SHARES guidelines), averaging for the EU as a whole, and adding the one percentage flexibility point, leading to a 4.8% cap. For the two other scenarios, we simply take 7% and 10% as harmonised flat caps for all Member States.

Then, to reach the maximum volumes that the different cap scenarios would allow, we multiply the cap percentages (4.8%, 7% or 10%) with the projected RES-T denominator *with* multipliers of the year we want to analyse. So for instance, for the volume the current rules would allow in 2040, we multiply the RES-T denominator for 2040 with the current rules cap, and reach 17.5 Mtoe.

Under the current rules, our analysis shows that almost all Member States' share of food and feed crop biofuels in transports are below the 7% maximum. This detailed calculation includes for the cap modeling the 2020 share and the one percentage point flexibility, but also the 2% maximum increase allowed for Member States for whom the share was under 1%. Moreover, for the denominator, as the scope is RED III, it includes road, rail, but also domestic and international navigation and aviation, with RED multipliers. We also took into account the 13% cap of gross final energy consumption for maritime, and 5% for Cyprus and Malta.

Almost all Member States sit well below their maximum cap

2024 share of food & feed crop biofuels consumption in transport and 2020 level cap (with flexibility)



Source: T&E analysis based on Eurostat SHARES 2024

Land use

To estimate land use for crop-based biofuels production, we have used data previously calculated by IFEU and T&E for the EU. For food and feed crop biofuels, we determined the land area by applying the 2022 IFEU ratio of land used per volume consumed to the maximum allowed volumes for each scenario and year, assuming a constant yield trajectory over time. IFEU results were scaled down from EU27+UK to EU27 here. To determine the share of EU arable land dedicated to crop-based biofuels, we calculated the ratio of land used for biofuel production to total EU arable land.

To evaluate what today's crop-biofuel land could produce, we have considered our land use figure *with* and *without* co-products, and the COCERAL grain forecast. We have excluded the imported feedstocks, making up approximately 48%, according to T&E, and assumed that all that land can grow grain.

Emissions

To estimate the emissions that each scenario would allow if the cap for food and feed crop biofuels were to increase, we have used typical emission factors from the RED, and previously established factors accounting for ILUC by Globium and T&E and ICCT. For the comparison to fossil fuels, we have used the RED's comparator for biofuels of 94 gCO2e/MJ.

Further information

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