

## BioChem Europe position on Sustainability Criteria

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Bioeconomy plays a pivotal role in achieving the strategic autonomy and resilience of the EU whilst tackling climate challenges, as confirmed in the [Letta Report on the EU Single Market](#) and the [Report of the Strategic Dialogue for the Future of Agriculture](#). Biomass-derived chemicals are key enablers of the green transition and EU competitiveness agenda. Sustainability criteria for biomass sourcing must be established in order to ensure a sustainable circular bioeconomy.

Implementing sustainability criteria in biomass sourcing ensures that the bioeconomy contributes positively to environmental goals such as biodiversity preservation, soil health and respect of planetary boundaries in general, elevating the environmental value of biomass-derived materials.

### Overarching sustainability criteria for biomass sourcing are needed

BioChem Europe, the Cefic sector group representing the biomass-derived chemicals producers, advocates for the implementation of sustainability criteria for biomass sourcing in line with the Renewable Energy Directive (RED) III. These guidelines – covering aspects such as biodiversity, forest management, and soil quality – should serve as the harmonised baseline for bio-manufactured products and be largely aligned for all sources of biomass, regardless of the final applications, whether it is food, materials, chemicals, or energy. By building on existing standards for biofuels and bioenergy, we can develop comprehensive sustainability criteria tailored to the needs of the chemical and material sectors, supported by robust certification mechanisms.

We support a holistic approach to sustainability criteria (re: biomass sourcing) to enable a sustainable bioeconomy in Europe. The EU Commission agenda, starting with the upcoming Bioeconomy Strategy revision, the Clean Industrial Deal, the Industrial Decarbonisation Accelerator Act, and other relevant initiatives (e.g. Common Agricultural Policy), should clearly and consistently refer to these criteria. Harmonised sustainability criteria should also be included in sector-specific legislation (e.g. product legislation), alongside market pull measures, to incentivise biomass-derived chemicals and materials.

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#### BioChem Europe

Rue Belliard 40 – Boite 15 – 1040 Brussels - Belgium

Tel: +32 2 436.94.61 - [sse@cefic.be](mailto:sse@cefic.be)

A sector group of Cefic 

European Chemical Industry Council - Cefic aisbl

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To address the environmental challenges of renewable feedstock and its availability, the cascading use<sup>1</sup> principle should follow any references to the sustainability criteria. This means that biomass should be used where it makes more environmental, economic and social sense – i.e. circularity, value creation and jobs.

## Alignment to taxonomy and LCA methodology

BioChem Europe recommends aligning sustainability criteria (i.e. biomass harvesting) to the RED III definition (Art 29 (2-7)). However, RED III GHG emission saving criteria should not be used as a reference for biomanufacturing in general. Specific adjustments are needed to translate the requirements for fuels into requirements for materials (e.g. chemicals, plastics, etc.), using a sector by sector approach.

In line with the taxonomy criteria on CO<sub>2</sub><sup>2</sup>, biomass-derived materials should prove to have a lower CO<sub>2</sub> footprint compared to fossil-based materials they intend to replace. This should be demonstrated via an LCA based on scientifically robust and harmonised widely accepted methodology at EU level using the -1+1 approach<sup>3</sup> allowing a fair account of biogenic carbon. While LCA using primary data should be the preferred choice, in the absence of such data, producers should be allowed to access secondary databases by providers recognised by the European Commission.

Since LCA methodologies to allow a fair comparison of biomass derived and fossil based materials are still being discussed, it is key to already put in place incentives<sup>4</sup> for biobased and biomass-derived materials in order to ensure a level playing field. Certification schemes on bio-based feedstock use should be assessed by the Commission to provide guidance to the industry regarding the most appropriate, fair and widely accepted ones. A consistent approach to certification schemes would have the advantage of creating

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<sup>1</sup> The cascading use principle should be used as a general reference, but should not be applied to each specific sector in order to avoid market distortions or excessive burdens for the industry undermining the goals of the bioeconomy. The cascading use principle aims to achieve the resource efficiency of biomass use “according to its highest economic and environmental added value”, thus increasing the amount of sustainable biomass available within the system. This “is intended to ensure fair access to the biomass raw material market for the development of innovative, high value-added bio-based solutions and a sustainable circular bioeconomy”.

<sup>2</sup> The EU taxonomy climate delegated act mentions that “In the absence of legally agreed sustainability criteria on the role of biomass in plastic packaging, the technical screening criteria for manufacturing of plastic packaging making substantial contribution to the transition to a circular economy focus on use of bio-waste feedstock.” This highlights the urgency of establishing sustainability criteria that can be referenced in all key legislation to recognize the role of the biobased sector.

<sup>3</sup> Joint industry position on biogenic carbon accounting in PEF: [Joint-Statement-on-biogenic-carbon-accounting-in-Product-Environmental-Footprint-PEF-2.pdf \(cefic.org\)](#) . The -1,+1 approach is compliant with standards such as prEN 18027

<sup>4</sup> See [BioChem Europe position on market pull measures](#)



certainty and predictability and ensuring a univocal interpretation and implementation of the sustainability criteria.

While we welcome the initiative by the Commission aiming at assessing the possibility to lay down targets to increase the use of biobased feedstock in certain product categories, as mentioned in the PPWR, art 8 (2) taking into consideration sustainability criteria as per RED III, we consider that the proposed timeline and product by product approach might not allow to address the urgency of accelerating the defossilisation of the industry boosting the biobased sector in Europe.

We recommend the development and implementation of a comprehensive sustainability criteria for biomass sourcing, fitting with or adapted to existing certification programs, for all types of biomass and captured carbon to ensure their effective and sustainable use in chemicals and materials.

