

Consultation Response – Energy

Transport Regulation (REDIII)

Implementation

Submitted on behalf of Sunoil Bio Fuels B.V., IJsselland Bio Fuels B.V. & Cibus Supply and Trading B.V.

Dear policymakers,

Sunoil Biodiesel welcomes the opportunity to respond to the consultation on the amendment of the *Regeling energie vervoer* under RED III.

We would like to raise specific concerns regarding the proposed introduction of a 0.5 multiplier for biofuels produced from Category 3 animal fats (AF Cat. 3).

1. A crucial feedstock for renewable fuels

Category 3 animal fats are one of the three most important feedstocks for European biodiesel production, alongside used cooking oils (UCO) and vegetable oils (JRC, 2022¹). In the Netherlands, Cat. 3 fats have long provided a stable and reliable feedstock, making a significant contribution to the achievement of renewable energy targets in transport (NEa, 2023²).

Applying a 0.5 factor will reduce the value of this feedstock in the Netherlands, while international demand remains unchanged. This will not free up Cat. 3 fats for alternative uses, but instead encourage exports and relocation of production to other countries.

2. Climate impact and reduction targets

Processing Cat. 3 fats locally into biodiesel prevents unnecessary exports and related transport emissions. Independent analyses (ICCT, 2021³; CE Delft, 2020⁴) confirm that local use of Cat. 3 fats maximizes GHG savings, whereas displacing production abroad undermines the very climate goals RED III seeks to achieve.

Discouraging Cat. 3 in the Netherlands therefore risks weakening the effectiveness of RED III by increasing emissions through transport while global biodiesel demand remains constant.

¹JRC (European Commission Joint Research Centre), *The EU biofuels feedstock mix*, Technical Report, 2022.

²NEa (Dutch Emissions Authority), *Annual Report on Energy for Transport 2023*.

³ICCT (International Council on Clean Transportation), *Waste and residue feedstocks for biofuels: climate benefits of local use*, 2021.

⁴CE Delft, *Greenhouse gas impacts of biofuel feedstock trade flows*, 2020.

3. Cascading principle in context

We acknowledge the importance of the cascading principle, as raised by NVG. However, Cat. 3 fats are unsuitable for human consumption. Their use in biodiesel is consistent with RED III's objective to utilize residues and waste streams for renewable energy production.

Restricting this application will not generate new feedstocks for the pet food sector but will destabilize the renewable fuels market and reduce the Netherlands' contribution to EU climate targets.

4. Policy consistency and investment certainty

RED III (Directive (EU) 2023/2413⁵) explicitly recognizes Cat. 3 fats as a sustainable feedstock. Introducing a national 0.5 multiplier undermines the harmonized EU framework and risks regulatory fragmentation. This erodes investor confidence and creates uncertainty in the Dutch renewable fuels sector.

A predictable and stable policy environment is essential to secure continued progress towards European decarbonization goals.

Conclusion and Call to Action

We urge the Ministry of Infrastructure and Water Management to reconsider the proposed 0.5 multiplier for Category 3 animal fats.

- Maintaining Cat. 3 as a fully recognized feedstock is essential for safeguarding renewable fuel production in the Netherlands.
- Local use delivers direct and demonstrable GHG savings.
- EU-aligned regulation prevents market distortion and ensures investor confidence.

Allowing Category 3 fats to continue playing their full role in Dutch biodiesel production will secure the sector's contribution to Dutch and European climate objectives.

On behalf of Sunoil Bio Fuels B.V., IJsselland Bio Fuels B.V. & Cibus Supply and Trading B.V.

Date:

3 October 2025

Signature:

Rentia Schoeman

Head of Sustainability Department

⁵ Directive (EU) 2023/2413 of the European Parliament and of the Council (RED III).

EFPPA (European Fat Processors and Renderers Association), *Annual Market Report on Animal Fats and By-products*, 2023.
NVG (Dutch Pet Food Industry Association), *Consultation Response on RED III – September 2025*.