



MEE/Energy Department, TR

3.11.2016

Comments on Issue Paper:

"Strategic Targets for bioenergy and renewable fuels needed for sustainable transport solutions in the context of an Initiative for Global Leadership in Bioenergy" dated 26.10.2016

- The general order in this document is wrong. Renewable fuels for transportation should be in front, in bigger part and not bioenergy, as in the former more rapid development is needed as in the later. With the below text inclusion – and perhaps some other similar ones - this can be done adequately without rewriting totally. When basing Temporary Working Groups (TWG) on the declarations, here two separate TWGs will be needed, or one TWG meeting with mostly different stakeholders and representatives.
- In the Introduction it should be stated better that the emission reduction requirements by 2030 for non-trading sector will ask for several and strong measures in transportation. Hoping that Electric Vehicles (EV) would solve it all is false. This following text at the end or any other place of the Introduction would state it better:
 - o “The EU decision to reduce non Trading Sector greenhouse gas emissions by 30 % by 2030 compared to 2005 level puts strong demand to reduce the emissions from transport sector as it is has the biggest share of non Trading Sector emission. The transport sector is still very dependent on fossil fuels as even E10 gasoline with 10 % share of renewable is not yet sold in most of the Member States. Dramatic and quick changes are required in whole EU.”
- It is a shame that the Winter Package with Renewable part will come just few weeks later to give stronger boost for sustainable renewable fuels in transport.
- On page 4 with footnote 9 it is stated that “2020 target” means the sum of the Member States plans. The text above should be: “...of bioelectricity is already close to the 2020 sum of the Member States plans⁹.” Writing “2020 target” gives an impression that there is truly an agreed, set target for this, as it is only sum of these numbers from the national plans – which are not “targets”.
- To the end of this paragraph this text or new paragraph could be included:
 - o “The operation flexibility of biomass fueled power plants shall be improved in order to better compensate weather related electricity production variations. Improved operational flexibility covers faster ramp rates and lower minimum loads. Most preferable and efficient is to develop these properties for multifuel combined heat and power plants (CHP). There are technological process and mechanical design related challenges to be studied.”
- The numbering of different parts and layout of titles / subtitles in the document is unclear. There is no chapter 4. Under Strategic Targets there are items 1, 2 and 3 on both Renewable Fuels and Bioenergy, which should be numbered.
- In targets put first 5.1 Strategic Targets on Renewable Fuels for Transport and after that 5.2 Targets in Bioenergy and inside them have “5.1.1. Improve performance in the renewable fuels” etc.

- In this new 5.1.1. have also a target for 2030. Target for 2020 is no target really for technology but it can stay. Targets for 2030 could be:
 - o By 2030, obtain total share of 7–10 % (xx – yy TWh/Mtoe) for advanced biofuels.
 - o Phase out the first generation products so that by 2030 they would be marginal.
- The total transport fuel consumption in the footnote 17 is confusing. What is 430 Mtoe containing, marine and aviation consumptions too? The road transport consumption is 340 Mtoe. The xx and yy in 2030 and 2020 targets above should be corresponding to correct consumption.
- In the new 5.1.3.2 (fuels for transport, reduce cost, renewable liquid and gaseous fuels): obviously these two targets are for year 2030. The 4 €/kg target for electrolysis seems to be not challenging at all.
- Concentration on reducing the cost of intermediate carrier and excluding feedstocks cost is only partial optimization. It is the total price (excluding taxes) that matters: in some case feedstock could be cheap but conversion costly and vice versa. A text in new 5.1.3. (fuels for transport, reduce cost and also similarly to 5.2.3), at the end of the paragraph, footnote 20 should say:
 - o “ ... the application of innovative practices²⁰. The total price is dependent on the prices of the feedstock and the conversion process. Improvements and targets in processing should be considered in this manner.”
- Annex A as it is in the draft must be removed. It is confusing the reader. These are selected targets from annex of older “towards and integrated roadmap” documents. They are overlapping, under- or overrunning the targets in the text before (5. Targets...). This annex can be used later in the Temporary Working Group (TWG) in the implementation work.