

EFG

European Fermentation
Group



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Press release

Molasses for Food Alliance members recall molasses should not be prioritised as feedstocks for biofuels

The European Feed Manufacturers Federation (FEFAC), the Confederation of European Yeast Producers (COFALEC) and the European Fermentation Group (EFG), all members of the Molasses for Food coalition, have contributed to the stakeholder consultation led by E4Tech and launched under the review of the RED II Annex IX.

Our respective contributions have jointly called on the leading appointed consultants by the European Commission not to recommend the addition of molasses and low-green syrup in the Annex IX.

We based our rationale on the following information:

- Molasses & low-green syrup are neither waste nor residues, but food and feed materials with a high nutritional and economic value. In line with the circular economy and resource efficiency principles, **high value food and feed uses** should be prioritised over low-value energy uses;
- There is **not enough molasses in the EU** to cover the additional demand for biofuels that would inherently be triggered by its inclusion in the Annex IX. The EU currently already needs to **import more than 1.8 million tons of molasses** every year resulting in a structural deficit in the supply of molasses¹;
- The inclusion of molasses & low-green syrup in Annex IX would likely entail significant **indirect greenhouse gas emissions** associated with the need for the fermentation, bakery, brewery and animal feed industries to replace, when possible², molasses by other feedstocks³ or **indirect land-use change related emissions**, linked to the need to increase the sugar production;
- Limiting the availability of molasses & low-green syrup for several industrial sectors would **endanger their competitiveness**. For instance, the European yeast and fermentation industries heavily relies on molasses for the production of food and feed products. This would result in increased imports of products, such as yeast and citric acid, from third countries, and thus less investment in Europe;

¹ According to official statistics ([OECD/FAO Agricultural Outlook 2018-2027](#)), the European Union will need to annually import on average 1.8 million tons between 2018 and 2027.

² There is to date no alternatives to low-green syrup and molasses for the production of yeast.

³ International Council on Clean Transportation (ICCT), "Potential greenhouse gas savings from a 2030 greenhouse gas reduction target with indirect emissions accounting for the European Union", *WORKING PAPER 2017-05*, (5 May 2017), pp. 1-26. Available online: <http://www.theicct.org/potential-savings-2030-GHG-reduction-target-EU>

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- Thus far, there has been no impact assessment prepared on the consequences arising from the inclusion of molasses and low-green syrup in the Annex IX; this scenario would therefore contradict the European Institutions commitment to **evidence-based policy making**⁴;
- The inclusion of molasses and low-green syrup in Annex IX would divert resources away from the development of **truly advanced biofuels** made from well-defined waste and residues and which need significant technological investments to get onto the market;
- Adding molasses and low-green syrup to the Annex IX would also be **contrary to the principle of the Waste Hierarchy**, as established under the Article 4 of the Waste Framework Directive⁵, and that favours reuse over low-energy uses; and
- Last but not least, **the European Parliament and the Council of the European Union** agreed in 2018 – on the basis of all the arguments above mentioned – that molasses had to be removed from the European Commission’s proposal on the recast of RED II.

For all the above-mentioned reasons, and in line with the Green Deal political agenda to bring society and the economy into circularity, our industries urge that molasses remain excluded from the Annex IX, today and in all future reviews.

For more information about what we do, visit our website: <https://www.molassesforfood.eu/>

⁴ *Interinstitutional Agreement of 13 April 2016 on Better-Law Making*, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2016:123:FULL&from=EN>

⁵ Directive 2008/98/EC on waste (Waste Framework Directive)