

BioChem Europe : Paving the way for a thriving Bioeconomy in Europe

BioChem Europe applauds the Commission goal to shape a strong European Bioeconomy agenda and will keep providing insightful contribution to its implementation.

Commission Communication on Biotechnology and Biomanufacturing

On 20 March 2024, the European Commission published its Communication [“Building the future with nature: Boosting Biotechnology and Biomanufacturing in the EU”](#), setting eight main actions to overcome current challenges and obstacles and strengthen the EU bioeconomy framework.

BioChem Europe fully supports the recognition of Biotechnology and Biomanufacturing as valuable solutions to address societal and environmental challenges and key enablers of **competitiveness, strategic autonomy and resilience**. These key elements are consistent with the priorities of the EU industrial policy agenda which is currently taking shape.¹

Moreover, the chemical industry can play an important role in the “defossilisation” of the economy via an increased focus on sustainable carbon cycles. An accelerated use of sustainable biomass alongside recycled materials and captured CO₂ in the chemical industry can help achieving climate and environmental goals, while enhancing Europe’s industry competitiveness.

While the Commission Communication is an encouraging first step, a clear roadmap will need to materialise in bolder ambitions and concrete actions to reach a full revision of the EU Bioeconomy Strategy, due to take place in 2025. More efforts and concrete incentives are needed to accelerate the transition towards a sustainable and circular bioeconomy in Europe and offer actionable solutions to current and future challenges to grasp the opportunities ahead.

BioChem Europe call for action

- Product Environmental Footprint

As the Commission considers the Product Environmental Footprint (PEF) and Life Cycle Assessment (LCA) methods as the guiding approach for environmental impact assessment, elaborating an accurate method to assess the carbon footprint of biomass-derived products² is crucial.

¹ [Antwerp Declaration for an Industrial Deal, Conclusion of the Special Meeting of the European Council](#)

² Biomass derived products include bio-based and bio-attributed products



We therefore support the **review of the Product Environmental Footprint (PEF)** methodology and we urge the Commission to complete in a timely manner the announced impact assessment of the feasibility of biogenic content requirements in specific product categories and public procurement.

- Market pull measures

Stimulating market demand for bio-based products will be crucial to achieve a flourishing bioeconomy in Europe. BioChem particularly welcomes the Commission's intention to conduct an in-depth impact assessment of the feasibility of bio-based content requirements in specific product categories and in public procurement. Such requirements, that could be established through delegated acts under the new Ecodesign for Sustainable Products Regulation, are expected to drive market penetration and stimulate innovation to shift from fossil sources.

Additionally, effective **market pull measures** will need to be implemented to incentivise the market uptake of biomass derived products, starting with public procurement, (financial) incentives for biomanufacturing as well as creating **awareness** about the benefits of biomass derived product to increase consumer acceptance.

- Access to biogenic feedstock

It will be crucial to **remove barriers to access of biomass, secure a stable, fair and competitive access to carbon neutral energy and bio-based raw materials as a precondition to attract production investments and allow a scale-up** of biotech and biomanufacturing projects at industrial level. Hence, sustainability criteria should be applied for the sourcing and use of biomass for biotechnology and biomanufacturing, consistent with the criteria for biomass for bioenergy uses stated in the Renewable Energy Directive³.

Furthermore, the potential of cultivation of biomass on abandoned farmland and unused degraded land as well as of leveraging the use of intermediate crops should be investigated and its viability assessed.

- Cascading Use Principle

To address the issue of biomass availability, the members of BioChem Europe call the European Commission to **establish a robust cascading use of bio-based feedstocks** allowing biomass use to be prioritised "according to its highest economic and environmental added value"⁴. Implementing the cascading use principle for biomass offers significant environmental benefits as it reduces the need for

³ [Directive - EU - 2023/2413 - EN - Renewable Energy Directive - EUR-Lex \(europa.eu\)](#)

⁴ [Directive - EU - 2023/2413 - EN - Renewable Energy Directive - EUR-Lex \(europa.eu\)](#)



primary resource extraction, lowers greenhouse gas emissions, and mitigates environmental degradation associated with waste disposal. This is crucial to achieve a sustainable and circular Bioeconomy.

- Financial framework

BioChem Europe urges the European Commission to ensure the upcoming Bioeconomy strategy will not miss the chance to transition the Bioeconomy Agenda from an R&I to a full-fledged Industrial policy strategy. To do so, the Commission will need to be more decisive in setting its priority for the implementation of the bioeconomy, including from a financial perspective, where the Communication on Biotech and Biomanufacturing lacks any **reference to the EU Taxonomy** and only vaguely defines the framework for a Biotech Act.

- Legislative framework

We agree with the Commission that ensuring legislative consistency and streamlining regulatory pathways is key to achieve a sustainable bioeconomy. We believe that a coherent legislative framework regulating bioeconomy throughout the whole value chain is crucial.

To achieve a successful and competitive Bioeconomy in Europe, Bioeconomy must become part of **legally binding rules**, enjoy a **consistent legislative framework** where value chains can benefit of **regulatory predictability** and make Bioeconomy strive to the benefit of the society and of the environment and in line with the EU strategic and environmental ambition.

BioChem Europe will continue to engage in the discussions in view of the upcoming review of the EU Bioeconomy Strategy, trusting it will take into consideration the societal, environmental and economic challenges and will enable the European bioeconomy sector to achieve its potential.

BioChem Europe is a sector group of the European Chemical Industry Council (CEPIC) that envisions a future where:

- responsibly produced chemicals derived from sustainably sourced biomass respond to society's growing appetite for circular products that have limited or even positive impacts on the environment and climate
- the related need to increase and support the efficient utilization of biomass is recognized
- boosting research and innovation is seen as critical for these developments

The biomass-derived chemicals producers, members of BioChem Europe, intend to play their part and forge partnerships to achieve the European ambition to become climate-neutral by 2050.

For more information, visit our website: <https://www.biochem-europe.eu>

