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Avenue Louise 250, Box 80
1050 Brussels

Thierry Breton
Commissioner for Internal Market
European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 19 February 2024

Dear Commissioner Breton,

Re: Call for a new definition of renewable carbon

As a group of European associations representing various actors along the renewable carbon value chain, we are writing to bring to your attention a matter of importance concerning the need to further accelerate the reduction of the fossil carbon use in the European economy.

We call on the European Commission to take a leading role in proposing a clear definition of renewable carbon in the European policy framework, based on the standardisation work. The signatories of this letter stress that policymakers should use science-based terminology to promote the capture and the use of renewable carbon in the economy, which will recognise the role of the European circular bioeconomy in advancing climate neutrality by 2050.

Renewable carbon is part of the biogenic carbon cycle. Renewability is defined as the ability of a resource to replenish naturally at source at a rate at least the same as consumption (for example, ISO 8887-1:2017, 3.1.7, ISO 21930:2017, 3.6.3, ISO/DIS 59004 (the update not yet published), ISO 5157:2023, 3.2.2.1.). Similarly, the European standards define renewable material as composed of biomass and that can be continually replenished (EN 16575 Bio-based products). Unlike fossil carbon, biogenic carbon is part of the natural carbon cycle and does not contribute to the increase of fossil CO₂ in the atmosphere. According to ISO standards, recycled fossil resources can be considered as recovered, but not as renewable.

A clear definition will contribute to the EU's climate and energy objectives, providing a framework for ensuring the effective utilisation of renewable carbon in reducing emissions. Renewable carbon plays a central role in the European circular bioeconomy. The use of renewable carbon is becoming increasingly prevalent in various European industries, particularly manufacturing and energy.

Negative emissions are only possible while capturing and storing, also in materials and products, those forms of carbon that originate from renewable sources. This is for instance the case of harvested wood products (HWPs). After harvest, nearly all biogenic carbon remains stored in HWPs whereas atmospheric carbon is sequestered by vegetation re-growth thus generating a net sink that lasts over time. Capturing and storing fossil-based carbon is important but does

not lead to negative emissions. By proposing a standardised definition of renewable carbon, the European Commission can provide a solid foundation for harmonising policies, promoting innovation, and fostering a competitive market.

To further discuss this crucial action, we would like to request a meeting with you. This would offer an opportunity to start collaborating with the relevant stakeholders to develop a definition of renewable carbon based on the consensus achieved through the standardisation processes.

We look forward to witnessing the European Commission's commitment to advancing the circular bioeconomy through the establishment of a clear and standardised definition of renewable carbon.

Yours sincerely,



Jori Ringman,
Director General of Cepi

On behalf of:



ACE – Alliance for Beverage
Cartons and the
Environment



Cepi – Confederation of
European Paper Industries



CITPA – International
Confederation of Paper and
Board Converters in Europe



EBA – European Biogas
Association



EPF – European Panel
Federation



EPIS – European Pulp
Industry Sector



ePURE – European
renewable ethanol
association



FEFCO – European
Federation of Corrugated
Board Manufacturers