

## **Union Database for biofuels**

### **ECN and FEAD's concerns over its implementation**

The European Compost Network (ECN) and the European Waste Management Association (FEAD) would like to express their concerns regarding the implementation of the Union Database for biofuels (UDB) established under the Renewable Energy Directive (RED). The draft delegated regulation as proposed by the Commission would introduce an additional administrative burden on biowaste traders and would require an increased number of actors to enter data, which could impede biomethane development across the EU. In addition, the ECN and FEAD would like to point out that the data to be included in the UDB must already be entered into existing national databases, creating a risk of double counting, and that the proposed deadlines for entering transaction data are overly strict.

Therefore, the ECN and FEAD call on the Commission:

- To refrain from imposing data retrieval from first collection/gathering points, as the data could be obtained directly from the scheme or from a certification body.
- To take into account existing national databases, in order to avoid the refusal by actors in the value chain to enter the same data twice, which would prevent biowaste material from being certified and hence from being used in anaerobic digestion plants.
- To extend the timeframe for transaction data and the working days for the buyer to accept or reject the transaction to 30 days, providing more time for biowaste traders to comply.
- To introduce a more business-friendly option regarding the suspension of the active status of the economic operator who has missed any data or has not updated the relevant certification data on time.
- To postpone the mandatory use of the UDB until the 1<sup>st</sup> January 2026 at the earliest.



### About the ECN

The European Compost Network is the leading European membership organisation promoting sustainable recycling practices through composting and anaerobic digestion of organic resources and safeguarding the quality and safe use of recovered organic fertilisers and soil improvers. With 67 members from 27 European countries, ECN represents more than 4,500 professionals and operators with more than 45 million tonnes of biological waste treatment capacity.

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### About FEAD

**FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe**, including 20 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

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