

To the attention of:

Executive Vice-President Frans Timmermans
Commissioner for Transport Adina-Ioana Vălean
Commissioner for Energy Kadri Simson
Commissioner for Internal Market Thierry Breton
Director General Mauro Petriccione
Director General Henrik Hololei
Director General Ditte Juul Jørgensen
Director General Kerstin Jorna

Brussels, 26 May 2021

Call to include a voluntary crediting system for sustainable renewable fuels into the vehicle CO₂ regulations

Dear Madam or Sir,

The 223 signing associations, companies and scientists of this letter fully support the EU's target to be climate-neutral by 2050 and recognise the major role that the transport sector has to play in this regard. However, the current approach focusing only on tailpipe emissions from new vehicles falls short of ensuring the transition towards climate neutral mobility. In view of the ongoing preparation for the Fit for 55 package, we would therefore like to emphasise the need for a sustainable renewable fuels dimension in the revised CO₂ standards for cars and vans regulation and for the next step revision for the HDV sector. The EU's overall climate goals can be achieved faster and with greater certainty using sustainable renewable fuels as an additional path to reduce CO₂ emissions from the EU vehicle fleet.

The results of the related EU stakeholder consultation demonstrate that a large number of respondents are in favour of a mechanism that takes into account the contribution of sustainable renewable fuels in the future CO₂ fleet regulation. With more than 1,000 responses to the question: "A mechanism should be introduced in the CO₂ emission standards for cars and vans so that compliance assessment for each manufacturer takes into account the contribution of renewable and low carbon fuels", approximately 70% responded that this option is of "high importance".¹

Based on two studies², Frontier Economics proposes a voluntary crediting system that would allow automotive manufacturers (OEMs) to partially benefit from the use of sustainable renewable fuels for compliance with their targets (for the integrity of the system, Frontier Economics suggests capping the volumes of sustainable renewable fuels that OEMs can have credited against their fleet targets).

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12655-Revision-of-the-CO2-emission-standards-for-cars-and-vans-/public-consultation_en

² Frontier Economics "Crediting system for renewable fuels in EU emission standards for road transport - Report for the German Federal Ministry for Economic Affairs and Energy (BMWi)" (<https://www.frontier-economics.com/media/3937/crediting-systems-for-renewable-fuels-in-eu-emission-standards-for-road-transport-en.pdf>), and Frontier Economics "Crediting system for renewable fuels: functionality & benefits - Report prepared for Neste" (<https://www.frontier-economics.com/media/4347/crediting-system-for-renewable-fuels.pdf>)

Only sustainable renewable fuels additional to the volumes mandated under the Renewable Energy Directive and fulfilling its sustainability criteria would qualify for such a crediting system. In doing so, the system would avoid the double counting of OEMs' and fuel suppliers' CO₂ emission reduction efforts, with each of them having clearly defined responsibilities.

A voluntary crediting system would also send timely investment signals for fuel suppliers to embark on the volume production of sustainable renewable fuels, which are much needed for the decarbonisation of legacy vehicles as well as other transport modes, such as shipping and aviation. As a result, CO₂ emissions from transport would be lowered along the value chain from well to wheel.

We, the signatories, would like to stress that sustainable renewable fuels are meant to complement and not lessen the EU's efforts on electrification during the transition to zero-emission mobility and for as long as favourable conditions for battery electric and hydrogen mobility are not fully in place across all of the EU Member States (e.g. in terms of consumer acceptance, charging and refuelling infrastructure or the GHG intensity of the electricity mix). Sustainable renewable fuels are a long-lasting bridge that will enable the transition from conventional vehicles to zero-emission (tailpipe) mobility and freight transport. A voluntary crediting system would represent a safety net for the massive transformations that companies in transport are already undergoing towards net-zero emission mobility.

In case there are any questions regarding the exact design³ of a voluntary crediting system, we would be happy to discuss with you the details of such a system in more depth and we remain at your disposal for any feedback or questions.

With kind regards,

The signees

This letter was also sent to respective Head of Cabinets and relevant Cabinet Members as well as to respective Directors, Head of Units and Policy officials in Directorate-Generals for Climate Action (DG CLIMA), Mobility and Transport (DG MOVE), Energy (DG ENERGY) and Internal Market, Industry, Entrepreneurship and SMEs (DG GROW). The letter will also be forwarded to Chairs and Vice Chairs of the committees of the European Parliament (TRAN, ITRE, ENVI, ECON, AGRI).

³ Frontier Economics report's amendment proposals from page 56 onwards: <https://www.frontier-economics.com/media/3937/crediting-systems-for-renewable-fuels-in-eu-emission-standards-for-road-transport-en.pdf>

Companies

						
Alcogroup SA	C4 Energi AB	Chemieanlagenbau Chemnitz GmbH	Hellenic Gas Transmission System Operator S.A.	Engie SA	Eni S.p.A	Envien Group
						
ERC ADDITIVE GmbH	ExxonMobil	FPT Industrial S.P.A.	Gas Networks Ireland	Gibgas	GRDF SA	GRTgaz SA
						
Hellenic Petroleum S.A.	Hexagon Agility	IVECO S.p.A	Landi Renzo S.p.A	MAHLE GmbH	Mazda Motor Europe GmbH	MdynamiX AG
						
Münzer GmbH	Neste Oyj	New Holland Agriculture	OrangeGas B.V.	OMV Group	Prins Autogassystemen B.V.	RenFuel AB
						
Repsol S.A.	Scandinavian Biogas Fuels International AB	Siemens Energy AG	Snam S.p.A.	Sunfire GmbH	Synhelion SA	Sysav Industri AB
						
Trans Austria Gasleitung GmbH	Total SE	Vialle Autogas Systems B.V.	Westport Fuel Systems			

Associations

 Swedish Coalition for Decarbonization of the Transport sector	 Association for Emission Control by Catalyst	 Italian Association of the Automotive Industry	 Portuguese Association of Oil & Gas Companies	 Spanish Biofuels Association	 Italian Energy Logistics Association	 National Association of Methane Distributors and Transporters
 National Fuel and Energy Association	 Bioenergy Association of Finland	 Biogas Academy	 Bulgarian Petroleum and Gas Association	 European Association of Automotive Suppliers	 CNG Industry Group	 CNG Club e.V.
 Czech Gas Association	 Drivkraft Danmark	 European Biogas Association	 European Confederation of Fuel Distributors	 eFuel Alliance	 Swedish Gas Association	 National Association of Fine Chemicals Companies and Specialized Sectors
 National Association of Liquefied Gas Companies	 National Federation of Methane Distributors and Transporters	 Association of Gas and Heat Supply Companies	 Association of Finnish Mobility Sector in the EU	 Division of the European Petroleum Refiners Association	 Iberian Association of Natural Gas for Mobility	 Gas Distributors for Sustainability
 International DME Association	 International Road Transportation Union	 The Chemical Industry Federation of Finland	 European LPG Association	 Advanced Biofuels Coalition	 Global Trade Association for the Methanol Industry	 Mittelständische Energiewirtschaft Deutschland e.V.
 Hungarian LPG Association	 Italian Natural Gas Vehicle Association	 Natural & bio Gas Vehicle Association	 Polish Liquid Gas Association	 European Fuel Ethers Association	 Swedish Bioenergy Association	 German Association of Small- and Medium-Sized Mineral Oil Companies
 Union Energy for Mobility	 The Voice of Europe's Independent Fuel Suppliers	 German Biofuel Industry Association	 Mechanical Engineering Industry Association	 German Federation for Motor Trades and Repairs	 Austrian Automobile, Motorbike and Touring Club	

Scientific community



VTT Technical
Research Centre of
Finland

Prof. Dr. Öivind Andersson Lund, Sweden	Thomas E. Briggs, Jr. Madison, Wisconsin, USA	Prof. Dr. Friedrich Dinkelacker Hannover, Germany	Prof. Dr.-Ing. Martin Geweke Hamburg, Germany
Prof. Ivan Arsie Naples, Italy	Prof. Dr. Matthias Brunner Saarbrücken, Germany	Prof. Dr.-Ing. Neda Djordjevic Berlin, Germany	Dr. Francisco Gírio Lisboa, Portugal
Prof. Dr.-Ing. Frank Atzler Dresden, Germany	Dr. Ales Bulc Leipzig, Germany	Prof. Dr. habil. Andreas Dreizler Darmstadt, Germany	Dietmar Goericke Frankfurt am Main, Germany
Prof. Dr.-Ing. Michael Bargende Stuttgart, Germany	Dr.-Ing. Bernhard Bäuerle Stuttgart, Germany	Prof. Dr. Alexander Eisenkopf Friedrichshafen, Germany	Prof. Dr.-Ing. Moritz Gretzschel Aalen, Germany
Dr. Ir. Ing. (Rob) R.J.M. Bastiaans Eindhoven, Netherlands	Dr. Benjamin Böhm Darmstadt, Germany	Dany Escudié Villeurbanne/Lyon, France	Dr. Armin Günther Frankfurt am Main, Germany
Prof. Carlo Beatrice Rome, Italy	Prof. Alasdair Cairns Nottingham, UK	Prof. Stefania Falfari Bologna, Italy	Prof. Ernst-M. Hackbarth Munich, Germany
Prof. Dr. Frank Behrendt Berlin, Germany	Prof. Nicolò Cavina Bologna, Italy	Prof. Zoran Filipi Greenville, South Carolina, USA	Prof. Dr. rer. nat. Kay-Rüdiger Harms Wolfsburg, Germany
Prof. Dr. techn. Christian Beidl Darmstadt, Germany	Prof. Giulio Cazzoli Bologna, Italy	Prof. Fabrice Foucher Orléans, France	Dr. Paul Hellier London, UK
Prof. Alberto Benato Padua, Italy	Prof. David Chiaramonti Turin, Italy	Prof. Alessio Frassoldati Milano, Italy	Dr. Roy Hermanns Eindhoven, Netherlands
Prof. Gian Bianchi Bologna, Italy	Prof. Ornella Chiavola Rome, Italy	Prof. Stefano Frigo Pisa, Italy	Prof. Dr. rer. nat. Dr.-Ing. E. h. Gerhard Hettich Nuremberg, Germany
Prof. Gianni Bidini Perugia, Italy	Prof. Enrico Corti Bologna, Italy	Prof. Chiara Galletti Pisa, Italy	Prof. Dr.-Ing. Karl Alexander Heufer Aachen, Germany
Chris Bitsis San Antonio, Texas, USA	Prof. Dr. Nicolaus Dahmen Karlsruhe, Germany	Prof. Colin Garner Loughborough , UK	Dr.-Ing. Christoph Hirsch Munich, Germany
Prof. Jacques Borée Futuroscope Chasseneuil/Poitiers, France	Mara de Joannon Napoli, Italy	Dr. Klaus Peter Geigle Stuttgart, Germany	Prof. Dr.-Ing. Marc Hölling Hamburg, Germany
Prof. Sergio Bova Cosenza, Italy	Prof. Dr. Olaf Deutschmann Karlsruhe, Germany	Prof. Dr. Bernhard Geringer Vienna, Austria	Prof. Dr.-Ing. Dr. h.c. Rolf Isermann Darmstadt, Germany
Prof. Fabio Bozza Naples, Italy	Dr.-Ing. Ralph-Uwe Dietrich Stuttgart, Germany	Bernhard Gerster Basel, Switzerland	Prof. Bengt Johansson Chalmers, Sweden

Prof. Dr.-Ing. Thomas Kolb Edenkoben, Germany	Prof. Assaad Masri Sydney, Australia	Dr. Carmela Russo Napoli, Italy	Roberto Torelli Lemont, Illinois, USA
Prof. Sanghoon Kook Sydney, Australia	Prof. Diego Micheli Trieste, Italy	Prof. Dr. Amsini Sadiki Darmstadt, Germany	Prof. Augusto Torre Milano, Italy
Prof. Dr. Lucien Koopmans Gothenburg, Sweden	Paul Miles Livermore, California, USA	Dr. habil. Martin Schiemann Bochum, Germany	Prof. Athanasios Tsolakis Birmingham, UK
Prof. Dr. Jürgen Krahel Lemgo, Germany	Prof. Yasuo Moriyoshi Chiba, Japan	Prof. Peter Schmid Esslingen, Germany	Bianca Maria Vagelieco Napoli, Italy
Dr.-Ing. Thomas Kuchling Freiberg, Germany	Prof. Davide Moro Bologna, Italy	Dr.-Ing. Thorsten Schnorbus Winterberg, Germany	Dr. Steven Wagner Darmstadt, Germany
Prof. Dr. Christian Küchen Berlin, Germany	Prof. Dr.-Ing. Axel Munack Braunschweig, Germany	Prof. Jesper Schramm Lyngby, Denmark	Dr. Gerardo Valentino Napoli, Italy
Prof. Rosario Lanzafame Catania, Italy	Dr. Martin Müller Buchholz, Germany	Prof. Dr. Christof Schulz Duisburg, Germany	Prof. dr. ir. J.A. (Jeroen) van Oijen Eindhoven, Netherlands
Prof. Dr. Felix Leach Oxford, UK	Prof. Angelo Onorati Milano, Italy	Prof. Dr.-Ing. Helmut Seifert Ludwigshafen, Germany	Prof. Dr.-Ing. Holger Watter Flensburg, Germany
Prof. Seong-Young Lee Townsend, Houghton, Michigan, USA	Prof. Dr. Peter Pfeffer Munich, Germany	Peter Kelly Senecal Madison, Wisconsin, USA	Prof. Dr.-Ing. Mathias Wilichowski Wismar, Germany
Dipl.-Ing. Keno Leites Norderstedt, Germany	Prof. Dr.-Ing. Heinz Pitsch Aachen, Germany	Prof. Dr. Anika Sievers Hamburg, Germany	Prof. Dr.-Ing. Thomas Willner Hamburg, Germany
Prof. Dr.-Ing. Wolfgang Leuckel Bad Dürkheim, Germany	Dr. Wilfried Plum Herzogenrath/Aachen, Germany	Prof. John M. Simmie Galway, Ireland	Prof. Dr.-Ing. Karsten Wittek Heilbronn, Germany
Prof. Tommaso Lucchini Milano, Italy	Prof. Fabrizio Ponti Bologna, Italy	Prof. Dr.-Ing. Werner Sitzmann Hamburg, Germany	Prof. Hongming Xu Birmingham, UK
Dr.-Ing. Klaus Lucka Aachen, Germany	Dr. Gonzalo Prieto Valencia, Spain	Jonas Sjöblom Gothenburg, Sweden	Prof. Dr. Yi Yang Melbourne, Australia
Prof. Alarico Macor Padova, Italy	Prof. Dr.-Ing. Ralph Pütz Landshut, Germany	Dr. Sibendu Som Chicago, Illinois, USA	Prof. Dr. Reinhard Zellner Essen, Germany
Philippe Marchand Biofuel Expert, Paris, France	Prof. Dr.-Ing. Reinhard Rauch Karlsruhe, Germany	Prof. Ezio Spessa Turin, Italy	Prof. Dr. Cornelius Zetzsch Isernhagen, Germany
Prof. Silvia Marelli Genoa, Italy	Prof. Vittorio Ravaglioli Bologna, Italy	Prof. Dr.-Ing. Rainer Stank Hamburg, Germany	Prof. Hua Zhao London, UK
Xandra Margot Valencia, Spain	Prof. Dr.-Ing. Konrad Reif Friedrichshafen, Germany	Prof. Anna Stoppato Padova, Italy	Dr. ir. Shanglong Zhu Utrecht, Netherlands
Prof. Dr. Thomas Martin Merseburg, Germany	Prof. Vittorio Rocco Rome, Italy	Prof. dr. hab. Inz. Andrzej Teodorczyk Warszawa, Poland	Dr.-Ing. habil. Lars Zigan Erlangen, Germany
Prof. Massimo Masi Padova, Italy	Prof. Christine Rousselle Orléans, France	Prof. Dr. Katharina Theis-Bröhl Bremerhaven, Germany	