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 CO_2 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 CO_2 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 CO_2 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 CO_2 fleet regulation. With more than 1,000 responses to the question: "A mechanism should be introduced in the CO_2 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 studies[2], 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' CO_2 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, CO_2 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 design[3] 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

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Research Centre of
Finland

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Lund,
Sweden

Prof. Ivan Arsie
Naples,
Italy

Prof. Dr.-Ing. Frank Atzler
Dresden,
Germany

Prof. Dr.-Ing. Michael Bargende
Stuttgart,
Germany

Dr. Ir. Ing. (Rob) R.J.M. Bastiaans
Eindhoven,
Netherlands

Prof. Carlo Beatrice
Rome,
Italy

Prof. Dr. Frank Behrendt
Berlin,
Germany

Prof. Dr. techn. Christian Beidl
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Prof. Alberto Benato
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Prof. Gian Bianchi
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Prof. Nicolò Cavina
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Prof. David Chiaramonti
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Prof. Ornella Chiavola
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Prof. Dr. habil. Andreas Dreizler
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