

Welcome to the 130th edition of the UPEI Newsletter!



Image source: European Commission website.

Welcome to the 130th edition of the UPEI newsletter! February and the first days of March were marked with an acceleration of the EU initiatives, following the long period of installation of the new EU institutions.

The European Commission presented its work programme for 2025 on 11 February, followed by a “Clean Industrial Deal”, with as major element an “Action Plan for Affordable Energy”. On the same day two simplification packages, called “Omnibus” in the Brussels jargon, were also tabled. On 5 March, the Commission proposed an “Automotive Action Plan”, building on a dialogue launched essentially with car manufacturers and parts suppliers.

At the same time, the EU institutions and the Member States had to face a very “dynamic” international landscape, forcing them to accelerate their reflections on a comprehensive autonomous security and preparedness framework for Europe, which will impact all sectors of the economy. A first materialisation of this was the “ReArm Europe” Plan outlined by the European Commission president ahead of the European Council on 6 March. It aims to mobilise close to €800 billion essentially by allowing Member States to increase their defence expenditures significantly without triggering the Excessive Deficit Procedure, and by creating a new EU defence investments instrument providing €150 billion of loans to Member States.

Brussels News

European Commission Work programme 2025

On 11 February, the Commission published its [Work Programme \(CWP\) for 2025](#), outlining in detail the main initiatives it will take in the first year of its mandate. This is not a comprehensive programme, meaning that some further initiatives may be launched in the course of the year. It is named “A bolder, simpler, faster Union” and aims to boost competitiveness, enhance security, and bolster economic resilience in the EU.

The work programme lists 51 new initiatives, of which 18 of legislative nature. Moreover, of these 18, 11 are aimed at simplification or have a significant simplification dimension. The programme also includes 37 evaluations and fitness checks and 37 proposals for withdrawal.



Image source: European Commission website.

Amongst the most relevant initiatives are:

Decarbonisation

- Clean Industrial Deal (non-legislative, Q1 2025).
- Action plan on affordable energy (non-legislative, Q1 2025).
- European Climate Law amendment (legislative, Q1 2025).



- Sustainable Transport Investment Plan (non-legislative, Q3 2025).
- Industrial Decarbonisation Accelerator Act (legislative, Q4 2025).

Competitiveness

- Communication on a Savings and Investments Union (non-legislative, Q1 2025).

Evaluations and fitness checks

- Fitness check on energy security infrastructure (Indicative finalisation time: Q2 2025).
- Evaluation of the Public Procurement Directives (Indicative finalisation time: Q3 2025).
- Evaluation of the National Emission Reduction Commitments Directive (Indicative finalisation time: Q4 2025).
- Evaluation on the Land use, land-use change and forestry (LULUCF) Regulation (Indicative finalisation time: Q4 2025).

- Revision of the Sustainable Finance Disclosure Regulation (legislative, incl. impact assessment, Q4 2025).
- Targeted revision of the REACH Regulation (legislative, Q4 2025).

Source: Secretariat, Weber Shandwick.

Clean Industrial Deal (CID)



Image Source: European Commission website.

This is the European Commission “business plan” to decarbonise industry in the EU, attempting to bring decarbonisation and competitiveness closer together.

The plan focuses on 2 "key players" (energy-intensive industries such as steel, cement, chemicals) and clean technology. It touches on four strategic aspects: demand, cost, financing, and input, including initiatives on all 4. The CID contains forty initiatives that will be launched in the coming months, of which.

Access to affordable energy and infrastructure:

- Action Plan on Affordable Energy Q1 2025 (presented at the same time as the CID -see below).
- Legislative proposal on the extension of the Gas Storage Regulation Q1 2025.
- Clean Industrial Deal State Aid framework Q2 2025.
- Industrial Decarbonisation Accelerator Act: Speed-up permitting industrial access to energy and industrial decarbonisation Q4 2025.
- Recommendation on energy taxation Q4 2025.

Lead markets: boosting clean supply and demand:

- Delegated Act on low carbon hydrogen, providing regulatory certainty to producers of low carbon hydrogen Q1 2025.



Image Source: European Commission website.

Simplification

- First “Omnibus” package on sustainability (legislative, Q1 2025 - 26 February).
- Second “Omnibus” package on investment simplification (legislative, Q1 2025).
- Third “Omnibus” package, including on small mid-caps and removal of paper requirements (legislative, Q2 2025).



- Communication and legislative proposal on greening corporate fleets 2025/2026.
- Revision of Public Procurement Directives to mainstream the use of non-price criteria Q4 2026.



Image source: Petrochemicals Europe website.

Public and private investment:

- Recommendation to Member States to adopt tax incentives to support the Clean Industrial Deal Q2 2025.
- Pilot auction under the Innovation Fund for the decarbonisation of key industrial processes across various sectors 2025.
- Industrial Decarbonisation Bank Q2 2026.

Powering the circular economy: a secure access to materials and resources:

- Circular Economy Act Q4 2026.
- Green VAT initiative Q4 2026.
- Trans-Regional Circularity Hubs Q4 2026.

Global markets and international partnerships:

- Simplification of the Carbon Border Adjustment Mechanism (CBAM) Q1 2025.
- Comprehensive CBAM review assessing the feasibility of extending the CBAM scope to other EU ETS sectors at risk of carbon leakage, to downstream sectors and to indirect emissions and support to exporters, closing loopholes Q3 2025.
- Legislative proposal on an extension of CBAM Q1 2026.
- Trans-mediterranean Energy and Clean tech cooperation initiative Q4 2025.

Source: Secretariat, Weber Shandwick.

Action Plan on Affordable Energy

The objectives of this Plan are to lower energy costs, especially for low-income households and industry facing high production costs, to complete the Energy Union, attract investments, and be better prepared for potential energy crises.

The plan consists of eight actions structured around four pillars, many of them devoted to electricity, apart from:



Image Source: European Commission website.

Action 3: Improve gas markets for fair energy prices:

- Ensure fair competition in gas markets, Q4 2025:
 - the Commission will launch a broad stakeholder consultation to assess the need for further legislative changes to ensure full and seamless regulatory oversight, align and strengthen energy and financial market rules (MiFID/REMIT), and reduce the administrative burden on companies trading on financial markets for energy (single reporting).
- Harness EU purchasing power to get a better deal from imported natural gas, Q1-Q2 2025.
 - immediately engage with reliable LNG suppliers to identify additional cost-competitive imports from existing and future LNG export projects.
 - propose demand aggregation for EU companies entering tolling contracts at LNG plants worldwide and LNG supply option contracts with trusted LNG producers.
 - explore options going beyond demand aggregation and will investigate other approaches (e.g., the Japanese model).



Action 4: Energy efficiency: delivering energy savings:

- An efficiency market of European dimension, Q3-Q4 2025.
 - through the European Energy Efficiency Financing Coalition, the Commission will improve access to capital and provide financial incentives to support market actors who provide energy efficiency solutions for businesses.
 - explore further supporting the EIB Group programme for energy efficiency in SMEs.
- Give consumers access to more efficient appliances and products with longer lifetimes.

Pillar II: Building a genuine Energy Union

Action 5: Completing the Energy Union:

- Tackle the investment gap and mobilise private capital, Q2 2025.
- Building a more integrated energy market, 2026 to mid-2027.
- Providing investment certainty and a simplified governance regime for a robust Energy Union, 2026 to mid-2027.
- Increase digitalisation and use of AI in the energy sector, 2026 to mid-2027.
- Decarbonisation and integrating the heating and cooling sector enabling gas replacement, 2026 to mid-2027.

Pillar III: Attracting investment and ensuring delivery.

Action 6: A tripartite contract for affordable energy for Europe's industry:

- A tripartite contract for affordable energy between the public sector, including financial institutions, clean energy developers and energy-consuming industry.

Pillar IV: Being ready for potential energy crises.

Action 7: Security of supply for price stability:

- Contributing to price stability through a fit-for-purpose energy security framework, early 2026.
 - Put forward a legislative proposal for a revision of the current EU energy security regulatory framework.

Source: Secretariat, Weber Shandwick.

Automotive Action Plan



Image source: European Commission website.

On 5 March, the European Commission presented an Automotive Action Plan, based on discussions with the car manufacturers and suppliers through a [Strategic Dialogue on the Future of the European Automotive Industry](#), from which the energy suppliers were excluded. The Plan builds on several aspects:

- **Accelerating Innovation and Clean Mobility Transition.**

A dedicated European Connected and Autonomous Vehicle Alliance will bring together Europe's automotive stakeholders to shape the development of next-generation vehicles and help develop the shared software and digital hardware needed to bring this technology to life. Large-scale testbeds and regulatory 'sandboxes' will provide innovators with the freedom to test and refine their technologies for autonomous vehicles. The Commission will further develop the regulatory framework for autonomous vehicles. These actions will be supported by joint public-private investments of around €1billion backed by the Horizon Europe Programme over the 2025-2027 period.

- **More flexibility for CO2 Standards compliance.**

The Commission will propose a focused amendment to the CO2 Standards Regulation for cars and vans in March. The amendment, if adopted, would enable car manufacturers to meet their compliance targets by averaging their performance over a three-year period (2025-2027), while keeping the overall ambition on the 2025 targets.

The Commission will also accelerate work on the preparation of the foreseen review of the CO2 Standards Regulation for cars and vans.



In parallel, the Commission is working on ways to boost the demand for European zero-emission vehicles. The Action Plan includes measures that will provide incentives to switch to zero-emission vehicles and strengthen consumer trust through concrete measures, such as improved battery health and repairability.

- **Supporting Supply Chain Resilience and Workers in the Sector.**

The Commission will further support the EU battery industry and help it maintain a strong European production base, with financing under the Innovation Fund. The Commission will also investigate direct production support to companies producing batteries and non-price criteria for components such as resilience requirements.

This Action Plan is accompanied by the “Decarbonise Corporate Fleets Communication,” highlighting best practice examples and encouraging Member States to take further actions to green corporate fleets, which account for around 60% of new car registrations.

For More Information:

- [Communication: Industrial Action Plan for the European automotive sector.](#)
- [Communication: Decarbonise Corporate Fleets.](#)
- [Questions and answers - Commission unveils Action Plan to drive innovation, sustainability, and competitiveness in the automotive sector.](#)
- [Factsheet - Action Plan on the future of the automotive sector.](#)
- [Factsheet - Decarbonise Corporate Fleets.](#)

Source: EU Website and Secretariat.

Affordable Housing

On 6 March, Commissioner for Energy and Housing and the President of the EIB Group (the public investment arm of the European Union) have launched the foundations of a pan-European investment platform for affordable and sustainable housing.

The European Commission and the European Investment Bank (EIB) Group are partnering with Europe's national promotional banks (NPBs) and international financial institutions (IFIs) to develop new financing opportunities for affordable and sustainable housing across Europe.

The EIB Group will shortly launch an Action Plan for Affordable and Sustainable Housing with planned investments of around €10 billion over the next two years. The EIB Plan will support local and national efforts to build more affordable homes, renovate existing housing stock to be more energy efficient, and encourage more sustainable and innovative building materials and equipment. The EIB also launched a [housing portal](#), a one-stop shop to support final beneficiaries to access advice and finance. The EIB Group's investment aims to deliver 1.5 million new or renovated housing units across Europe. The EIB Action Plan and the portal are key building blocks for the pan-European investment platform, which will be open to other players such as NPBs and IFIs.

In July 2024, the EIB Group's [newly established Housing Task Force organised a kick-off event](#) to discuss scaling up financial support for affordable and sustainable housing throughout the EU.

Source: EU website.

Legislative updates



Image Source: Shaping Europe website.

Simplification of the Corporate sustainability due diligence (CSDDD) and the Corporate Sustainability Reporting (CSR) Directives (Omnibus I)

These simplification exercise aims at relaxing the stringency of the requirements substantially, at narrowing the scope of the CSR and at removing significant penalties and obligations from the CSDDD. A general overview is available here: Commission simplifies rules on sustainability and EU investments. The proposals are available here

In practice, the proposal consists of two Directives, which are interlinked and touch on two different aspects of the CSDDD, CSR, and some reporting aspects of the EU



Taxonomy. The first proposal addresses the timings of application of the different sustainability reporting requirements, while the second (available here) proposes the substantive changes.

Changes to the CSRD

- **Scope:** The proposal removes 80% of the undertakings in scope of the rules, taking out of scope large companies with up to 1000 employees and listed SMEs (even though EFRAG had already prepared draft ESRS standards to be adopted later next year). This means that some of the entities in the first and second wave of reporting, as well as all companies in the third wave of reporting, have been removed. In turn, only companies with more than 1000 employees and either a turnover of above EUR 50 million or a balance sheet above EUR 25 million would be required to report.
- **Timing of application:** bearing in mind the limited scope of the CSRD, the proposal also postpones the application of Article 5 (Transposition measures) by 2 years for entities in scope of the CSRD, starting from the financial year 2027 (instead of 2025). This in practice postpones the obligations for the second wave of reporters (as largest companies are already set to report as of this year) to 2027 instead of 2025.
- **European Sustainability Reporting Standards:** prior to the Omnibus proposal, companies had to report under the ESRS, which is the CSRD's delegated act defining the specific disclosures and ways in which companies can report. The Commission is proposing to maintain the ESRS only for the 20% of companies remaining in scope (large companies that are considered the parent companies and have more than 1000 employees). Six months after the co-legislators agree on the Omnibus changes (est. in 2026), the Commission will seek to amend the existing ESRS Delegated Act with a view to simplification and reducing the administrative burden for companies that must report under the CSRD (although this is not legally mandated in the proposal). According to the Commission, the amendment will seek to:
 - Remove the 'least important' mandatory ESRS datapoints.
 - Prioritise quantitative datapoints over narrative text.
 - Distinguish between mandatory and voluntary datapoints, without prejudice to the materiality assessment principle – this would aim to ensure that materiality is better applied across a company's sustainability reporting process.
- **Sector-specific standards:** Article 29 is amended to delete the obligation of the Commission to adopt sector-specific standards, which was originally scheduled for 2026.
- **Voluntary reporting:** Companies that are no longer in scope of the CSRD can still report under it, under a voluntary standard like the VSME standard prepared by EFRAG for non-listed SMEs. It must be noted that the VSME standard defers majorly to the ESRS Delegated Act for mandatory reporting, as it lacks the detailed reporting requirements put forward by the ESRS. This voluntary standard would then be adopted as a Delegated Act by the Commission (4 months after the entry into force of the Omnibus). The Commission would also seek to publish a reporting recommendation to help guide companies.
- **Value chain reporting:** the CSRD amendment proposal will also change reporting on the company's value chain, by amending the cap currently in place, to extend it. Rather than only focusing it on SMEs, the value chain cap will now protect all companies with 1000 or less employees, by mandating that companies should not seek to obtain any information that goes beyond what is to be specified in the standards for voluntary use to be issued by the Commission, except information commonly shared in the context of sustainability reporting. This limit will be legally defined in the voluntary standard mentioned above, that will be proposed as a Delegated Act.
- **Sustainability assurance:** the proposal also scraps the obligation of the Commission to produce sustainability assurance standards by 2026 – it will instead issue sustainability assurance guidelines, with a view to addressing emerging issues more quickly and avoid additional requirements. The possibility to move from a requirement of 'limited assurance' to 'reasonable assurance' is also removed to streamline rules and avoid added burden.
- **Taxonomy aligned activities:** in order to harmonise the EU Taxonomy and the CSRD and avoid additional reporting under the EU Taxonomy, the proposal introduces an 'opt-in' requirement for large



undertakings with more than 1000 employees and a net turnover of EUR 450 million which claim that their activities are aligned or partially aligned. These companies can disclose their turnover and Capex KPIs and can choose if they want to disclose their Opex KPIs.

Source: Weber Shandwick.

Taxonomy

On 5 March, the European Commission published a notice in the form of Q&As on the interpretation and implementation of certain legal provisions of the EU Taxonomy Environmental Delegated Act, the EU Taxonomy Climate Delegated Act and the EU Taxonomy Disclosures Delegated Act. Page 4 contains the table of content of the notice.

Source: EU website.

REFuel EU Aviation



Image Source: European Commission website.

The European Commission has published a report assessing the **development of the EU sustainable aviation fuels (SAF) market** and evaluating potential improvements to the SAF **flexibility mechanism**. Alongside the report, a **FAQ on ReFuelEU Aviation** has been released to provide further clarity and support for stakeholders implementing the Regulation.

- **Report on the SAF flexibility mechanism: improving traceability.**

The report indicates that industry is on track to meet the 2025 target of a 2% SAF share at EU airports and is progressing towards the 6% target for 2030. To support the gradual scale-up of SAF production, a flexibility mechanism allows fuel suppliers to average SAF blending obligations across EU airports until 2035. The report concludes that this mechanism, combined with the ongoing expansion of SAF production capacity in the EU, is already driving progress toward achieving SAF targets, and complex additional flexibility mechanisms appear to be unwarranted at this stage.

The report also highlights key areas for improvement, including enhancing **traceability** and **transparency** in SAF transactions, reducing **administrative burdens**, and simplifying **reporting obligations** for fuel suppliers and airlines. The Commission is already working to improve SAF traceability through its Union Database for Biofuels (UDB) and will explore further refinements to ensure better market oversight, particularly regarding SAF availability and pricing, whilst reducing the administrative burden on enterprises.

The report indicates that the Commission will continue to monitor SAF market developments, with a focus on advanced biofuels and synthetic aviation fuels. Further assessment of SAF accounting mechanisms, including those enabling virtual trading of SAF certificates, is also under preparation. The Commission will come forward with a **Sustainable Transport Investment Plan** later in 2025, outlining a strategic approach to scale-up and prioritise investments in transport decarbonisation solutions, including SAF.

- **Frequently Asked Questions**

It covers the provisions of ReFuelEU Aviation to help ensure a uniform application of the Regulation throughout the Member States. The FAQ provides clarity on its scope, fuels eligibility criteria, reporting obligations and enforcement, supply requirements, and the Flight Emissions Label (FEL).

For More Information:

- [Report from the Commission to the European Parliament and the Council – The ReFuelEU Aviation SAF flexibility mechanism.](#)
- [Supporting Study to the Commission report – Assessment of the production and supply of SAF in](#)



[Union airports and study on the feasibility of the creation of a system of tradability of SAF in the EU.](#)

- [Frequently Asked Questions – ReFuelEU Aviation](#)
- [ReFuelEU Aviation](#)

Source: EU website.

Research

Hydrogen

The [European Hydrogen Bank's](#) second auction for the production of renewable hydrogen has attracted 61 bids from projects in 11 countries with the European Economic Area (EEA). Eight of the bids were submitted under the dedicated maritime topic by hydrogen producers with off-takers in the maritime sector.

The total grant support requested is more than €4.8 billion, four times the available budget of €1.2 billion provided by the [Innovation Fund](#). All bids taken together account for a total electrolyser capacity of around 6.3 Gigawatts (GWe). Over ten years, these projects would produce more than 7.3 million tonnes of renewable hydrogen. On a yearly basis, this would cover 7% of the EU's "REPowerEU" ambition for domestic renewable hydrogen production in 2030.

Producers of renewable hydrogen, as defined in the [Renewable Energy Directive](#) and its [Delegated Acts](#), have submitted bids for support in the form of a fixed premium per kilogram of renewable hydrogen produced over a period of up to 10 years. The premium, for which project promoters bid in the auction, covers the gap between the cost of production and the price buyers are currently willing to pay for renewable hydrogen.

EU Member States can also benefit from an "Auctions-as-a-service" mechanism, whereby the results of the auction can attract further national funding for additional projects, in full respect of the EU State aid rules. Under the second auction of the [European Hydrogen Bank](#), [Spain](#), [Lithuania](#), and [Austria](#) have participated in this scheme, as announced in November 2024, with the contribution of up to €836 million in national funds. The Commission invites other Member States to take advantage of this service.

The [European Climate, Infrastructure, and Environment Executive Agency \(CINEA\)](#) is now evaluating submitted bids on the pass/fail qualification criteria outlined in the

call text. All passing bids will then be ranked according to their bid price. CINEA plans to inform about the evaluation results by the end of May 2025 and successful applicants will be invited to prepare and sign corresponding Grant Agreements.

The Grant Agreements are expected to be signed by November 2025 at the latest. The selected projects will have to reach financial close within 2.5 years and start producing renewable hydrogen within five years of signing the grant agreement. They will receive the awarded fixed premium subsidy for up to 10 years upon certified and verified renewable hydrogen production.

Source: EU website.

UPEI News



THE VOICE OF EUROPE'S INDEPENDENT FUEL SUPPLIERS

18/02/2025 | UPEI & FETSA Policy Event

On 18 February 2025, UPEI and FETSA (Federation of European Tank Storage Associations) organised the policy event, "Advancing Europe's Energy Security, Green Transition, and Competitiveness," at the European Parliament (Belgium)

MEP Michael Hadjipantela hosted this event aiming to highlight the key role of our sector in shaping EU energy policy, enhancing visibility and engagement with EU institutions while addressing key challenges and priorities for the 2024-2029 EU parliamentary term.

The panel, moderated by Luis Cervilla, Vice President Public Affairs, Weber Shandwick, consisted of:

- MEP Michael Hadjipantela, EPP Group in the European Parliament, Cyprus.
- Monika Zsigri, Head of Unit for Energy Security, DG Energy, European Commission.
- Johan Deleu, President of UPEI, the Voice of Europe's Independent Fuel Suppliers.



- Bruno Hayem, President of the Federation of European Tank Storage Associations.

Key discussion topics were:

- **European Energy Security:** how to ensure a resilient and sustainable energy system for the EU.
- **Liquid Energy Carriers, Climate Goals & Competitiveness:** the future of liquid energy carriers in the EU's green transition and their critical role in achieving Green Deal climate targets, while maintaining economic competitiveness.
- **Fit for 55" Legislative Package:** Discussion on the implementation of the Energy Taxation Directive (ETD), CO₂ standards for light-duty vehicles, and sustainable fuel incentives.
- **Legislative priorities for the new EU Mandate:** Debate on the course for the energy policy in the years ahead.

More information [here](#).

UPEI Publications

Joint Statement: Reality Check for European Hydrogen Policy to Adjust the Course

Joint Statement
Reality Check for European Hydrogen Policy to Adjust the Course

Brussels, 4th of February 2025, the 17 co-signatories of this joint statement represent technology providers, plant developers, producers, infrastructure operators, vessel manufacturers and users active across the entire hydrogen value chain and are determined to support EU's decarbonisation efforts. Hydrogen is, indeed, a crucial factor to achieve EU's net-zero target, and the co-signatories are committed to contribute to the development of a strong and competitive market for the EU.

Since 2020, the European Green Deal has set the framework to produce renewable hydrogen and derived fuels (RFNBOs), as well as low-carbon fuels. For the first time, hydrogen strategies, binding targets for different sectors, funding schemes and production volumes have been defined. We appreciate the important work of the European legislators, but the impact of this new framework, also as a result for countries outside the EU, will depend on how successful these measures will be.

In this regard, the EU RFNBO production, infrastructure and consumption sectors have been facing significant challenges that undermine the achievement of the 2020 hydrogen production and consumption targets, including:

- Large gap between strategic and political vision and market reality;
- Slow development of electrolyser capacity¹;
- Non-competitive renewables and low-carbon hydrogen production costs²;
- Underinvestment in and underdevelopment of infrastructure for producing and transporting hydrogen;
- Administrative barriers and delays in the implementation of critical funding;
- Missing long-term demand visibility and demand-side support mechanisms;
- Lack of clarity on low-carbon hydrogen's role in decarbonising the hydrogen market in Europe;
- Absence of effective hydrogen import rules and strategy.

Having considered the above, this Joint Statement calls for strong political leadership to the urgent need for a reality check and for both short-term and longer-term structural actions to re-address the course of action:

- Adopt more pragmatic and technology-neutral approaches to enable cost-competitive hydrogen production. In this context we call for:
 - A well-targeted assessment³ of the consequences that the current RFNBO criteria have on production costs, greenhouse gas emission savings and the energy system as specified in Article 38 of the Delegated Regulation (EU) 2023/1344⁴ and Renewable Energy Directive⁵.

On 4 February, UPEI, together with 16 co-signatories representing key players across the hydrogen value chain, came together to reaffirm our commitment to supporting the EU's decarbonisation efforts and advancing a strong, competitive hydrogen market in Europe.

The European Green Deal has established a framework for renewable and low-carbon hydrogen (RFNBOs). However, to ensure the successful implementation of the EU's hydrogen strategy and secure Europe's leadership in the global hydrogen economy, urgent and coordinated action is needed.

Key Priorities for Action:

- Adopt a pragmatic, technology-neutral approach to enable cost-competitive hydrogen production.

- Ensure continued financial incentives under the Clean Industrial Deal to reduce hydrogen costs at the technology level.
- Strengthen long-term planning security by revising the European Hydrogen Strategy.
- Accelerate, de-risk, and optimise the infrastructure development for hydrogen production and transport.
- Enable the creation of markets for RFNBO-based and low-carbon fuel products.
- Enhance European incentives on the demand side to drive sustainable hydrogen adoption.
- Strengthen the EU's role in creating a global market for hydrogen.

More information [here](#).

UPEI-FETSA Joint Project: Position paper on the Commission's upcoming Clean Industrial Deal

UPEI and FETSA call on the European Commission to leverage the upcoming Clean Industrial Deal as a pivotal moment for the energy sector.



UPEI-FETSA Joint Project: Energy for the Future
Position paper on the Commission's upcoming Clean Industrial Deal

February 2025

UPEI, the European Association of Independent Fuel Suppliers, and FETSA, the Federation of European Tank Storage Associations, welcome the upcoming Clean Industrial Deal, and urge the Commission to take it as an opportunity to address the practical concerns of the energy sector to create an EU economy that is truly clean, resilient, competitive, and secure.

This includes enhancing coherence of regulatory conditions, truly enabling the principle of technological neutrality, and increasing investment in industrialised countries and high-tech strategic sectors. Ahead of the publication of the Clean Industrial Deal in February 2025, we would like to take this opportunity to offer our recommendations and express the sector's priorities for the new Deal, to ensure competitiveness and sustainability in the years to come.

The new Clean Industrial Deal should build on the European Green Deal to foster competitiveness and safety.

A well and efficient implementation of the 'Fit for 55' package, the cornerstone of a resilient, diversified and prosperous European economy, with the carbon legislation package in place, and the way sector decarbonisation processes is timely and well aligned is now a top priority. It is crucial to build the Clean Industrial Deal on the existing regulatory and market conditions to make the EU economy and societies, but also competitive. We urge the Commission to make the recommendations of the UPEI-FETSA Joint Project for the Clean Industrial Deal to ensure a strong and competitive market for the EU.

The Clean Industrial Deal should ensure necessary adjustments to the EU Green Deal to strengthen industry and economic competitiveness, allowing the European economy to keep up technological and competitive.

As outlined in the European Green Deal (EGD) and before the Clean Industrial Deal is implemented, we would like to propose a set of recommendations to the EU Commission as a way to ensure the effectiveness of the Fit for 55 Package. It is crucial to ensure that EU legislation does not create any remaining fuel cost to reduce the clean transition and avoid effects on the Member States and consumers. This package is essential for the Clean Industrial Deal to be a game-changer, enabling Europe to reach its climate goals and ensure that the Clean Industrial Deal should demonstrate the Commission's commitment of technological neutrality through the high inclusion of such and related in the EU legislative framework. Through a targeted review in the Regulation on CO₂ emission standards of light-duty vehicles and heavy-duty vehicles, the introduction of a CO₂ emissions cap for the EU, bringing policy coherence, and creating a robust European value chain, fuel and energy systems in the Clean Industrial Deal, ensuring energy efficiency, sustainability and secure growth.

Finally, the technology neutrality principle should be preserved in all upcoming reviews of environmental legislation, and of course, across all other areas mentioned in the Clean Industrial Deal.

Key Priorities:

- **Coherence and Technological Neutrality:** the Clean Industrial Deal must align with the EU Green Deal to strengthen the competitiveness of EU industries, supporting diverse technologies, including e-fuels and advanced biofuels. The principle of technological neutrality should be fully embedded to avoid the exclusion of cost-effective solutions.
- **Simplification and Regulatory Clarity:** UPEI and FETSA urge the Commission to simplify administrative requirements, particularly for the energy sector. Streamlining corporate reporting obligations will reduce costs and enhance competitiveness.
- **Incentivising Investment:** the Clean Industrial Deal should drive investment in independent fuel suppliers and storage operators, critical for energy security, competitiveness, and sustainability. This includes targeted incentives for biofuels, especially in hard-to-decarbonise sectors like aviation, marine, and heavy-duty transport.



- Support for Industry Transition: a focus on regional diversity in transition paths is crucial to ensuring equitable investments and helping businesses ease into greener operations. Public procurement policies and alignment with the EU Green Taxonomy will play a key role in creating favorable conditions for energy investments.

More information [here](#).

Net-Zero Industry Act - Delegated Act on primarily used components under the Net-Zero Industry Act



UPEI, the voice of Europe's independent fuel suppliers, and FETSA, the Federation of European Tank Storage Associations, welcome the publication of the Commission's proposal for a Delegated Act defining the components primarily used for the production of the final products listed as net-zero technologies in the Net-Zero Industry Act (NZIA).

UPEI and FETSA strongly support the aim of the Net-Zero Industry Act to create enabling conditions for technologies that are critical to Europe's decarbonisation.

In this respect, we appreciate the Commission's proposed expansion of the Annex, with the aim to define the components of net-zero technologies in the scope of the NZIA. We believe that the further definition of the final products and components of such technologies will be critical to fully implement the NZIA harmoniously across Member States, truly enabling the deployment of critical decarbonisation technologies. In this regard, it is critical that liquid energy carriers are thoroughly considered within this legal framework, to ensure they can continue to contribute to the green transition, while benefiting from enabling conditions that will be particularly necessary for independent fuel suppliers.

With this in mind, UPEI and FETSA would like to propose some further additions to the Annex:

- **Energy storage technologies and liquefied/compressed gas energy storage technologies** UPEI and FETSA covered the Commission for its inclusion of energy storage technologies as part of the sub-category. We believe that, in this context, further clarification should be given to energy storage technologies, by adding components such as air liquefiers, cryogenic tanks, compressors and pumps, heat exchangers and expansion turbines. In addition, with regards to final products, we recommend a specification to cover particularly energy storage technologies in terminals designated, or with the capacity to act as, critical infrastructure, for instance storage stockpiling and reserves.
- **Sustainable Alternative Fuels (SAF) technologies.** The current delegated act only contains SAF plants at final products, and in accordance, also contains only these components relevant to plants. UPEI and FETSA strongly recommend that the Commission request this, to also include SAF storage and distribution to the key final products and components accordingly, as well as processes such as product purification and conditioning, intermediate storage and mixing as well as intermodal
- **Energy Storage:** clarification on components like air liquifiers, cryogenic tanks, and expansion turbines - essential for secure and strategic reserves.
- **Sustainable Alternative Fuels (SAF):** Expanding beyond SAF plants to include storage, distribution, and intermodal services, preventing supply chain bottlenecks, and supporting the EU's "Fit for 55" package targets.
- **Hydrogen and RFNBOs:** Strengthening midstream infrastructure by including carriers, derivatives, and distribution technologies - critical for market accessibility & energy security.

A comprehensive approach to defining components under the NZIA will boost investment, innovation, and Europe's energy transition. We stand ready to support the European Union in shaping a secure, competitive, and sustainable energy future.

More Information [here](#).

UPEI-FETSA Joint Project: Position Paper on the upcoming proposal for an Omnibus Simplification Proposal



February 2025

UPEI, the voice of Europe's independent fuel suppliers, and FETSA, the Federation of European Tank Storage Associations, welcome the Commission's intention to publish an Omnibus proposal with the aim to simplify and streamline the reporting requirements stemming from EU legislation.

The past few years have proven that there is an urgent need for Europe to move to more sustainable industrial activities, while also ensuring our security and competitiveness in the global playing field. These three objectives – competitiveness, security and sustainability (including the goal of carbon neutrality by 2050 and 90% GHG emissions reduction by 2050) cannot effectively be met without liquid energy carriers.

The members of UPEI and FETSA recognize the efforts made by the EU institutions to establish corporate sustainability reporting rules and frameworks that promote responsible business, in particular with regards to high-impact sectors such as mining, manufacturing and heavy industry. As the associations representing two sectors that are key for the decarbonisation of energy supplies, we believe that transparency and accountability in operations are key to ensure a sustainable future for our companies.

We have now fully analyzed and assessed the complexities of the different regulatory frameworks that were adopted during the last few years, and whose implementation is imminent (and therefore overlapping) from ensuring that companies disclose on a broadened range of sustainability topics through the CSRD, to mandating risk-based due diligence across supply chains through the CSDDD, and incentivising green investments through the Taxonomy Regulation.

Harmonise frameworks to enable corporate responsibility

The implementation of the aforementioned frameworks has proven to create added administrative and regulatory burden for companies, and particularly for small and medium enterprises in the EU. Liquid fuel suppliers and storage providers, which are already required to report extensively under many of the legislative pieces of the Fit for 55 (EU ETS, CBAM, Renewable Energy Directive, and many more), are also asked to duplicate their disclosure efforts to comply with the new obligations under the multiple sustainability legislations – disclosures that often do not align those required by the Fit for 55. The time discrepancy of include overlapping environmental impact reporting and risk mandating a duplication of efforts to assess value chains and sustainability, transparency, and climate-related risks. What is more, the Taxonomy puts in place separate disclosure requirements.

UPEI and FETSA welcome the European Commission's Omnibus Simplification Proposal, highlighting that reporting requirements are essential to balance competitiveness, security, and sustainability, including the EU's carbon neutrality goal by 2050 and a 90% GHG reduction by 2040.

Why is simplification needed?

In recent years, companies have faced a growing number of overlapping regulatory frameworks:

- CSRD: Expanding sustainability disclosures.
- CSDDD: Introducing mandatory due diligence across supply chains.
- Taxonomy Regulation: Incentivising green investments.

However, businesses (especially SMEs) are struggling with duplicated and misaligned reporting obligations, particularly in the energy sector. The Omnibus must:

- Harmonise frameworks to prevent unnecessary administrative burdens.
- Align sustainability rules with the "Fit for 55" package obligations.
- Ensure regulatory clarity to support businesses in the green transition.

Therefore, UPEI & FETSA urge policymakers to create a coherent, streamlined system that enhances transparency while maintaining competitiveness.

Reporting should be an enabler, not a barrier.

More information [here](#).



Joint Statement: Call for early technology-neutral review of the CO2 emission standards regulations and incentives to stimulate uptake of clean vehicles by fleet owners

Joint statement

Call for early technology-neutral review of the CO2 emission standards regulations and incentives to stimulate uptake of clean vehicles by fleet owners

Brussels, 21/02/2025

We, the 23 independent associations, representing a broad value chain that is part of the road transport sector, welcome the Commission's intention to launch a Strategic Dialogue on the Future of the Automotive Industry.

The decarbonisation of road transport requires fast political action covering short- and long-term solutions. The current transport legislative framework is missing crucial opportunities for investment across infrastructure, manufacturers and energy suppliers. The existing EU industrial action plan for the automotive sector should ensure that all technologies contributing to the decarbonisation of the transport sector are allowed to compete in the market on a level playing field and that measures to stimulate market uptake are proportionate.

We acknowledge with concern that the lack of technological neutrality in both regulations for light and heavy-duty vehicles constrains the choice of viable technologies to meet the CO2 reduction targets. Being able to support an investment case for a return to technology neutrality in the automotive sector is essential to ensure that the transport decarbonisation, including sustainable, low-carbon and renewable fuels, are needed to achieve the EU objectives while ensuring a path to market. Proportionate measures could be required by legislation on their own to ensure that the market-driven principles of the EU. The focus instead should be on developing the enabling conditions for all green technologies in the case of the CO2 standards regulations. This means to allow above-market-based fuels to complement electrification. It will result in faster decarbonisation of the existing vehicle fleet and other solutions for new vehicles to have an electricity substitution. In addition, such an approach will give choices to citizens and enterprises to effectively meet their mobility needs while contributing to the transition.

We therefore call for an anticipated review of the CO2 standards regulations for vehicles to be done in a way that recognises the maturity of technology usage approaches. Including the contribution of sustainable, low-carbon and renewable fuels (biofuels, e-fuels and more in general, fuels compliant with the Renewable Energy Directive, Renewable Energy Criteria (RED) and other criteria).

Vehicle technologies such as plug-in hybrids (PHEV) and range extenders should also be recognised as additional complements to electrification and allowed to contribute to the carbon emission reduction targets through the use of green electricity and renewable fuels in PHEVs.

We believe the review of the CO2 performance standards should be brought forward by one year. Further investments in renewable fuels and other solutions, leading to additional emission savings, should not lose time in order to achieve the objective of the Paris Agreement.

Further work has to be done by the Commission to fully stabilise the enabling conditions for the advanced vehicle technologies and sustainable low-carbon and renewable fuels and commercial and users of these technologies and fuels into the Strategic Dialogue as well as supporting the goals that are part of the automotive ecosystem to decarbonise solutions and to focus on ensuring that the necessary enabling conditions are in place for accelerated uptake of low-carbon technologies.

We, the undersigned, urge the Commission to take into account the above mentioned recommendations to protect European competitiveness, consumers' choice and to allow sustainable uptake and renewable fuels to contribute to achieve the decarbonisation of the road sector.

UPEI, together with stakeholders' form energy and mobility sectors, stand for real, technology-inclusive solutions to cut emissions.

Europe's climate goals demand urgent action, and that means recognising all viable pathways, including renewable fuels.

That's why we have joined forces with industry partners to call for

an early review of CO2 standards for cars.

The European Commission must ensure that policies embrace all CO2-neutral options alongside electrification.

To maximise impact.

What we are advocating for:

- Recognising all renewable energy solutions as a key part of the transition.
- Creating a sustainable and verifiable framework for CO2-neutral fuel use.
- Driving innovation and economic feasibility in transport.
- EU policymakers must take a technology-neutral approach that fully integrates CO2-neutral fuels into Europe's transport decarbonisation strategy.

More information [here](#).

UPEI's Position Paper on the Future of the Automotive Industry



UPEI's Position Paper on the Future of the Automotive Industry
21 February 2025

UPEI, the main of Europe's independent fuel suppliers, appreciates the opportunity to provide its insights and recommendations as part of the public consultation on the future of the automotive industry. UPEI is a member of the Strategic Dialogue on the Future of the Automotive Industry launched by European Commission President Von der Leyen.

As the Commission prepares an automotive industry action plan, it is crucial to acknowledge the critical role of independent fuel suppliers in accomplishing the goals that are part of the automotive ecosystem to decarbonise solutions and to focus on ensuring that the necessary enabling conditions are in place for accelerated uptake of low-carbon technologies.

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UPEI, the undersigned, urge the Commission to take into account the above mentioned recommendations to protect European competitiveness, consumers' choice and to allow sustainable uptake and renewable fuels to contribute to achieve the decarbonisation of the road sector.

UPEI has submitted its recommendations to the European Commission's Strategic Dialogue on the Future of the Automotive Industry. As the EU crafts its Automotive Action Plan, UPEI urges greater recognition of the sector's pivotal role in the clean transition and future competitiveness of European mobility.

UPEI highlights the importance of low-carbon fuels, such as advanced biofuels, e-fuels, and hydrogen, in achieving climate goals, and stresses the need to use existing infrastructure to ensure affordability and access.

To this end, UPEI calls for:

- A dedicated workstream on automotive energy and fuel supply, focusing on diversification, innovation, and the inclusion of all sustainable technologies, not just electrification.
- Regulatory coherence across EU policies to avoid fragmented or conflicting rules and ensure investment certainty.
- Inclusion of independent suppliers and SMEs in policymaking, with tailored support to help them thrive in the evolving automotive landscape.

UPEI recommends referencing the recent WGMM report on CO2-neutral fuels, which outlines diverse, technically feasible paths to decarbonisation.

With the right policies in place, UPEI believes independent fuel suppliers can help drive a fair, inclusive, and globally competitive transition for the EU's automotive sector.

More information [here](#).

You may check the UPEI answer to the European Commission public consultation on the future of the European automotive industry [here](#).

UPEI Circulars

05/2025 [UPEI Board Meeting 13/12/2024](#)

[UPEI Board Meeting 20/01/2025](#)

[Decisions & Actions](#)

06/2025 [UPEI Spring General Meeting 2025](#)

08/2025 [European Commission Update](#)

[Industry's Competitiveness](#)

[Sustainability orientations](#)

UPEI Diary

April 2025

9/11 [Fuel Payments commission meeting](#)

9/11 [UPEI Spring General Meeting 2025](#)



UPEI Diary

May 2025

- 21/05 Retail Stations commission meeting
- 20-22/05 Trade Fair "Tankstelle and Middelstand'25

June 2025

- 17/06 Energy Transition commission meeting
- 18/06 UPEI Board meeting



THE VOICE OF EUROPE'S INDEPENDENT FUEL SUPPLIERS

UPEI Spring General Meeting 2025



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