

**To the attention of:**

Executive Vice-President Frans Timmermans  
Commissioner for Transport Adina-loana 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<sub>2</sub> 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<sub>2</sub> 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<sub>2</sub> 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<sub>2</sub> fleet regulation. With more than 1,000 responses to the question: "A mechanism should be introduced in the CO<sub>2</sub> 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".<sup>1</sup>

Based on two studies<sup>2</sup>, 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).

<sup>1</sup> [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](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)

<sup>2</sup> 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<sub>2</sub> 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<sub>2</sub> 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<sup>3</sup> 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).

<sup>3</sup> 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

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

## Associations

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

## Scientific community



VTT Technical  
Research Centre of  
Finland

Prof. Dr. Öivind Andersson  
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  
Darmstadt,  
Germany

Prof. Alberto Benato  
Padua,  
Italy

Prof. Gian Bianchi  
Bologna,  
Italy

Prof. Gianni Bidini  
Perugia,  
Italy

Chris Bitsis  
San Antonio,  
Texas, USA

Prof. Jacques Borée  
Futuroscope Chasseneuil/Poitiers,  
France

Prof. Sergio Bova  
Cosenza,  
Italy

Prof. Fabio Bozza  
Naples,  
Italy

Thomas E. Briggs, Jr.  
Madison,  
Wisconsin, USA

Prof. Dr. Matthias Brunner  
Saarbrücken,  
Germany

Dr. Ales Bulc  
Leipzig,  
Germany

Dr.-Ing. Bernhard Bäuerle  
Stuttgart,  
Germany

Dr. Benjamin Böhm  
Darmstadt,  
Germany

Prof. Alasdair Cairns  
Nottingham,  
UK

Prof. Nicolò Cavina  
Bologna,  
Italy

Prof. Giulio Cazzoli  
Bologna,  
Italy

Prof. David Chiamonti  
Turin,  
Italy

Prof. Ornella Chiavola  
Rome,  
Italy

Prof. Enrico Corti  
Bologna,  
Italy

Prof. Dr. Nicolaus Dahmen  
Karlsruhe,  
Germany

Mara de Joannon  
Napoli,  
Italy

Prof. Dr. Olaf Deutschmann  
Karlsruhe,  
Germany

Dr.-Ing. Ralph-Uwe Dietrich  
Stuttgart,  
Germany

Prof. Dr. Friedrich Dinkelacker  
Hannover,  
Germany

Prof. Dr.-Ing. Neda Djordjevic  
Berlin,  
Germany

Prof. Dr. habil. Andreas Dreizler  
Darmstadt,  
Germany

Prof. Dr. Alexander Eisenkopf  
Friedrichshafen,  
Germany

Dany Escudié  
Villeurbanne/Lyon,  
France

Prof. Stefania Falfari  
Bologna,  
Italy

Prof. Zoran Filipi  
Greenville,  
South Carolina, USA

Prof. Fabrice Foucher  
Orléans,  
France

Prof. Alessio Frassoldati  
Milano,  
Italy

Prof. Stefano Frigo  
Pisa,  
Italy

Prof. Chiara Galletti  
Pisa,  
Italy

Prof. Colin Garner  
Loughborough ,  
UK

Dr. Klaus Peter Geigle  
Stuttgart,  
Germany

Prof. Dr. Bernhard Geringer  
Vienna,  
Austria

Bernhard Gerster  
Basel,  
Switzerland

Prof. Dr.-Ing. Martin Geweke  
Hamburg,  
Germany

Dr. Francisco Gírio  
Lisboa,  
Portugal

Dietmar Goericke  
Frankfurt am Main,  
Germany

Prof. Dr.-Ing. Moritz Gretschel  
Aalen,  
Germany

Dr. Armin Günther  
Frankfurt am Main,  
Germany

Prof. Ernst-M. Hackbarth  
Munich,  
Germany

Prof. Dr. rer. nat. Kay-Rüdiger Harms  
Wolfsburg,  
Germany

Dr. Paul Hellier  
London,  
UK

Dr. Roy Hermans  
Eindhoven,  
Netherlands

Prof. Dr. rer. nat. Dr.-Ing. E. h. Gerhard  
Hettich  
Nuremberg,  
Germany

Prof. Dr.-Ing. Karl Alexander Heufer  
Aachen,  
Germany

Dr.-Ing. Christoph Hirsch  
Munich,  
Germany

Prof. Dr.-Ing. Marc Hölling  
Hamburg,  
Germany

Prof. Dr.-Ing. Dr. h.c. Rolf Isermann  
Darmstadt,  
Germany

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
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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
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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
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Prof. Massimo Masi Padova, Italy	Prof. Christine Rousselle Orléans, France	Prof. Dr. Katharina Theis-Bröhl Bremerhaven, Germany	