



## Joint statement

# An early revision of CO<sub>2</sub> emission standards regulations should be driven by technology openness

*Brussels, 21 October 2024* - The Network for Sustainable Mobility\* takes note of the emerging political debate on the decarbonisation of road transport and recognises with concern that the lack of technology openness in both regulations for light and heavy-duty vehicles severely constrains the choice of viable technologies to meet the CO<sub>2</sub> reduction targets.

Mario Draghi's report on competitiveness affirms that in the automotive sector the EU has failed to adhere to the technological neutral approach – an overarching, guiding principle of the EU legislation. As we envision a climate-neutral road transport system, we urge the co-legislators to rethink the long-held assumption for which only a limited list of technology solutions is suitable to reach climate neutrality in road transport. We therefore call for a revision of the CO<sub>2</sub> standards regulations for vehicles in a way that recognises the necessity of a technology open approach, including the contribution of sustainable, renewable fuels (biofuels, e-fuels and more in general, fuels compliant with the Renewable Energy Directive), towards OEM's CO<sub>2</sub> reduction targets.

All breakthrough technologies with CO<sub>2</sub> emissions reduction potential, should be allowed to contribute to complement electrification in the decarbonisation of the road transport system, leaving both the market and the consumer the choice of the most suitable and cost-effective options. This legislative recognition would result in a strong political signal to enable the successful market deployment of sustainable, renewable fuels.

We firmly believe that Europe's climate ambitions and industrial strength go hand in hand. The opportunity for continued dialogue on the EU's industrial action plan for the automotive sector, as outlined in the Draghi report and the mission letter to Commissioner-designate for Transport, Apostolos Tzitzikostas, is highly anticipated. We also welcome the mission letter to Commissioner-designate for Climate, Wopke Hoekstra, which takes important steps towards technology neutrality. However, in line with the focus on CO<sub>2</sub> reduction, we would like to point out that a targeted amendment needs to include all RED compliant fuels to drive the transformation of the value chain. Our Network supports a unified plan that champions

both decarbonisation and competitiveness by utilizing the full spectrum of low-carbon technologies.

**\*About the Network for Sustainable Mobility:**

The Network for Sustainable Mobility is a voluntary and informal gathering of stakeholders along the value chain representing the transport, engineering, fuel manufacturing and energy sectors supporting the role of sustainable renewable fuels in a climate-neutral road transport system.

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**About the signatories:**

	<p>The coalition represents organisations across the whole advanced biofuels value chain, from companies carrying out commercial production today, the enabling supply chain and those investing in the future production pipeline.</p>
	<p><a href="#">AECC</a>, the Association for Emissions Control and Climate is an international non-profit scientific association of European companies operating worldwide in the research, development, testing and manufacture of key sustainable technologies for mobile and stationary applications. Their products include substrates for catalysts and filters; catalysts (substrates with catalytic materials incorporated or coated); adsorbers; filter-based technologies; fuel cells and electrolyzers.</p>
	<p>Bioethanol France is the association representing French bioethanol producers.</p> <p>It advocates for deployment of E10 and E85 fuels and works on fully renewable E85 fuel.</p> <p>France is the 1st producer of agricultural ethyl alcohol in Europe.</p>



[CLEPA](#), the European Association of Automotive Suppliers based in Brussels, represents over 3,000 companies, from multi-nationals to SMEs, supplying state-of-the-art components and innovative technology for safe, smart and sustainable mobility, investing over €30 billion yearly in research and development. Automotive suppliers in Europe directly employ 1.7 million people in the EU.



As the voice of sustainable biogas and biomethane in Europe, the European Biogas Association is committed to work with European institutions and stakeholders to develop policies which can enable large-scale deployment and utilisation in all end-uses of these renewable biogases. EBA counts today on a well-established network of over 300 members from 35 countries, covering the whole biogas and biomethane value chain.



The European Biodiesel Board (EBB) is a non-profit organization established in January 1997. The EBB gathers over 37 members across 21 Member-States, representing over 65% of the European output. Biodiesel is the main European solution to reduce emissions from transport and dependence on imported oil. The EBB promotes the use of biodiesel in the European Union and is committed to fulfil international standards for sustainability in GHG emissions and sustainable feedstock. The EBB is constantly working towards the development of improved and greener technologies.



ECFD represents the interests of more than 10,000 independent distributors of liquid fuels for the mobility and heating sectors. With an average of 60% of the independent petrol stations being family-owned, ECFD members maintain a reliable supply of conventional fuels, biofuels, LPG and CNG to customers across Europe. In addition, ECFD members supply fuels used in shipping and non-road mobile machinery, such as agricultural machinery, as well as manage direct B2B relationships with road haulage companies.



The eFuel Alliance is a stakeholder initiative committed to promoting the political and social acceptance of eFuels and to securing their regulatory approval. We represent more than 180 companies, associations and consumer organizations along the value chain of eFuel production. We stand for fair competition and a level-playing field for all relevant emission reduction solutions. We are clearly committed to more climate protection and aim to win broader recognition of the significant contribution eFuels can make in the drive for sustainability and climate protection. Our goal is to facilitate the industrial production and widespread use of carbon neutral fuels made from renewable energy sources.



ePURE - the European renewable ethanol association represents the interests of European renewable ethanol producers to the European institutions, industry stakeholders, the media, academia, and the general public. The organisation, established in 2010, promotes the beneficial uses of ethanol throughout Europe, including renewable fuel that reduces greenhouse-gas emissions by an average of 79.1% compared to fossil fuels. Based in Brussels, ePURE speaks for 41 member companies and associations (including 21 producers), with around 50 production plants in 16 member states and the UK, accounting for about 85% of the renewable ethanol production in Europe.



Eurogas is an association of over 100 members representing gaseous energy in Europe and is active throughout the gas sector value chain, including renewable and low-carbon gases, their derivatives and CCUS. Its members cover wholesale and retail gas markets, the distribution of gaseous energies, the use of gas in transport, technology providers and companies active on value chain methane emissions management.



[EWABA](#) represents the interests of European waste-based and advanced biofuels industry by promoting the inclusion of waste-based and advanced biofuels in the EU fuel mix as a sustainable means of reducing greenhouse gas emissions in EU transport. Our 55+ members active in most EU Member States collect and use waste and advanced feedstocks listed in parts A and B of Annex IX of the Renewable Energy Directive (REDII) to produce sustainable biodiesel with the highest GHG savings (up to +90%) when compared with fossil fuels, thus enabling “near-term decarbonization” of the EU road and maritime transport sectors.



Fleet Cards Europe (FCE) is the voice of independent fleet card providers in Europe. It was established in 2021 as a non-profit association. The FCE membership includes key players in the fleet cards market which are headquartered and operate across the European Union. Approximately a quarter of all fuellings in the B2B segment in Europe are purchased by fleet cards issued by one of the members of FCE.

	<p>FinMobility is a Brussels-based, leading voice in the EU for the Finnish employers' and business organizations in the mobility sector.</p>
	<p>FuelsEurope, the voice of the European fuel manufacturing industry. FuelsEurope represents, within the EU institutions, the interest of 41 companies manufacturing and distributing conventional and renewable fuels and products for mobility, energy &amp; feedstocks for industrial value chains in the EU.</p>
	<p>GD4S represents the leading natural gas distributors in France, Greece, Ireland, Italy, the Netherlands, Portugal, Romania, Spain and the United Kingdom. Together, we represent 47 million customers in Europe (over 30% of the European market). Gas distributors are responsible for operating the gas distribution network, ensuring its maintenance, and its development. We are responsible for safely distributing natural and renewable gas to consumers.</p>
	<p><a href="#">IRU</a> is the world road transport organization, promoting economic growth, prosperity, and safety through the sustainable mobility of people and goods. Founded in 1948, IRU has members and activities in over 100 countries.</p>
	<p>Liquid Gas Europe is a nonprofit association that represents the voice of the liquid gas industry (including LPG, bioLPG, and rDME) in Brussels. We advocate for a safe and stable regulatory environment to ensure a just energy transition for all.</p>
	<p>The <a href="#">Mittelstandsverband abfallbasierter Kraftstoffe e.V.</a> (German waste-based biofuels association - MVaK) represents 29 members from Germany, Austria and The Netherlands which collect and prepare suitable vegetable waste oils and residues, mainly used cooking oil, process them into waste-based and advanced biodiesel or trade feedstocks and finished products.</p>



Nederlandse  
Biodiesel uit Afval  
Alliantie

The [NBAA](#) is an alliance of five waste-based biodiesel producers with a production site or facility in the Netherlands: *Argent Energy, Bio Oil, Chevron Renewable Energy Group, Greenergy and Muenzer*. The alliance cooperates closely with European and German / Austrian industry associations for waste-based biodiesel: *EWABA and MVaK*. The NBAA has a joint mission to highlight the advantages and opportunities of this sustainable biofuel and actively represents these views to (political) stakeholders.



Bundesverband  
EnergieMittelstand  
Kraftstoffe | Brennstoffe | Schmierstoffe

UNITI represents around 90% of organised German SME fuel distributors with a combined turnover of 35 billion euro and 80,000 employees. UNITI members operate almost 6,350 petrol stations with a market share of over 45% in the petroleum retail market. Furthermore, UNITI members maintain approximate market shares of 80% in the heating oil sector – supplying around 20 million consumers – and 50% in the distribution of lubricants. UNITI is a founding member of the eFuel Alliance and a member of the European associations ECFD.



UPEI  
THE VOICE OF EUROPE'S INDEPENDENT FUEL SUPPLIERS

UPEI represents European importers and wholesale/retail distributors of energy and related service providers to European transport and heating customers, independently from the major producers. Operating from the energy production gate to the final consumer, UPEI members supply conventional energy and increasingly its molecule and electron-based renewable and sustainable alternatives. Independent suppliers, covering more than a third of Europe's demand, play a crucial role in an evolving market by bringing competition which is vital to the economy. Their independence enables them to respond rapidly to changes in terms of market structure, products, and services, contributing to security of supply on a local, regional, and national level.



VDB Zukunft tanken.

The Association of the German Biofuel Industry (VDB) represents the interests of 16 biofuel producers in Germany, which have a production capacity of 2.5 million tons of biodiesel and 900 GWh of biomethane.



VDMA Engines and Systems represents some 70 suppliers and manufacturers of internal combustion engines for industrial applications. Typical applications for these engines include mobile machinery for construction and agriculture, power and heat generation, railroads and ships. The trade association acts as a communication platform and a political and technical lobby for its members.

It bundles, analyzes, processes and addresses topics relevant to the industry, provides data and facts, communicates in the interests of its members and establishes networks in Germany, Europe and the world. The focus is on emissions and environmental legislation, standardization and ship classification.