

Roma, 26 maggio 2021

CO₂ NEI TRASPORTI: UNEM FIRMA PROPOSTA PER SCAMBIO VOLONTARIO DI CREDITI

Unem è tra i 223 firmatari, che comprendono compagnie, operatori della filiera *automotive*, Associazioni e rappresentanti della Comunità scientifica, di una lettera inviata al Vice-Presidente della Commissione europea, Frans Timmermans, e ai Commissari Trasporti, Energia e Mercato Interno, con la quale si chiede **la revisione del Regolamento sugli standard delle emissioni di CO₂ per i nuovi veicoli (auto e camion) che attualmente vengono considerate solo allo scarico.**

L'attuale Regolamento, infatti, **non permette di cogliere i vantaggi dei carburanti liquidi a basso o nullo contenuto di carbonio** che possono dare una reale contributo per raggiungere l'obiettivo della decarbonizzazione dei trasporti in modo sostenibile economicamente e socialmente.

A tale proposito, i firmatari chiedono **l'adozione di un nuovo meccanismo di scambio volontario di crediti sulla CO₂ risparmiata con l'uso di carburanti low-carbon** tra produttori di *fuels* e costruttori di auto (OEM) da conteggiare ai fini del rispetto dei loro target emissivi. Un simile sistema avrebbe anche il vantaggio di inviare i giusti segnali per attivare i necessari investimenti in carburanti liquidi a basso o nullo contenuto di carbonio.

Nella lettera si fa altresì presente come tutto ciò richieda anche **un adeguamento della Direttiva sulle rinnovabili nei trasporti (RED)** attualmente in fase di revisione.

A seguire il testo della lettera e l'elenco dei firmatari.



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 Joma

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

 Alco Group 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	 M dynamix AG
 Münzer GmbH	 Nestle 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 Industr AB
 Trans Austria Gasleitung GmbH	 Total SE	 Vialle Autogas Systems B.V.	 Westport Fuel Systems			



Associations

 2030 Swedish Coalition for Decarbonization of the Transport sector	 AECC Association for Emission Control by Catalyst	 CANFIA Italian Association of the Automotive Industry	 Apetro Portuguese Association of Oil & Gas Companies	 appa Spanish Biofuels Association	 ASSOCOSTIERI Italian Energy Logistics Association	 ASSOGASMETANO National Association of Methane Distributors and Transporters
 assopetroli National Fuel and Energy Association	 BIOENERGIA Bioenergy Association of Finland	 BIOGASACADEMY Biogas Academy	 BPGA Bulgarian Petroleum and Gas Association	 CLEPA European Association of Automotive Suppliers	 CNG INDUSTRIEKREIS CNG Industry Group	 CNG CLUB CNG Club e.V.
 CZGAS ASSOCIATION Czech Gas Association	 Drivkraft Denmark	 EBA European Biogas Association	 ECFD European Confederation of Fuel Distributors	 eFuel alliance eFuel Alliance	 ENERGIGAS SVERIGE Swedish Gas Association	 FEDERCHIMICA AISPEC National Association of Fine Chemicals Companies and Specialized Sectors
 FEDERCHIMICA ASSOGASLIQUIDI National Association of Liquefied Gas Companies	 FEDERMETANO National Federation of Methane Distributors and Transporters	 FGW Association of Gas and Heat Supply Companies	 FinMobility Association of Finnish Mobility Sector in the EU	 FuelsEurope Division of the European Petroleum Refiners Association	 gasnam Iberian Association of Natural Gas for Mobility	 GD4S Gas Distributors for Sustainability
 IDA International DME Association	 IRU International Road Transportation Union	 KEMIAN TEOLLISUUS The Chemical Industry Federation of Finland	 Liquid Gas Europe European LPG Association	 ADVANCED BIOFUELS COALITION LSC Advanced Biofuels Coalition	 GTA Global Trade Association for the Methanol Industry	 MEW Mittelständische Energiewirtschaft Deutschland e.V.
 MPE Hungarian LPG Association	 NGV Italian Natural Gas Vehicle Association	 NGVA Natural & bio Gas Vehicle Association	 POGP Polish Liquid Gas Association	 Sustainable Fuels European Fuel Ethers Association	 SVEBIO Swedish Bioenergy Association	 UIMM German Association of Small- and Medium-Sized Mineral Oil Companies
 UNEM Union Energy for Mobility	 UPEI The Voice of Europe's Independent Fuel Suppliers	 VDB German Biofuel Industry Association	 VDMA Mechanical Engineering Industry Association	 VDF German Federation for Motor Trades and Repairs	 OAMTC Austrian Automobile, Motorbike and Touring Club	



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