

Roma, 26 maggio 2021

## CO<sub>2</sub> NEI TRASPORTI: UNEM FIRMA PROPOSTA PER SCAMBIO VOLONTARIO DI CREDITI

Unem è tra i 220 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> regulations**

Dear Madam or Sir,

The 220 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 (BMW)" (<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 58 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	 Chemleantlagenbau Chemnitz GmbH	 Hellenic Gas Transmission System Operator S.A.	 Engie SA	 Eni S.p.A	 Envien Group
 ExxonMobil	 FPT Industrial S.P.A.	 Gas Networks Ireland	 Gibgas	 GRDF SA	 GRTgaz SA	 Hellenic Petroleum S.A.
 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
 Viale Autogas Systems B.V.	 Westport Fuel Systems					



**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>The Association of Renewable Energy Companies</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</p>
<p>Czech Gas Association</p>	<p>Drivkraft Denmark</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>Central Association of the Automotive Industry</p>	<p>Austrian Automobile, Motorbike and Touring Club</p>	



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