

## **The Renewable and Low-Carbon Liquid Fuels Joint Response to the Open Public Consultation on the Revision of CO2 Emission Performance Standards for Cars and Vans [Regulation (EU) 2019/631]**

The members of the **Renewable & Low-Carbon Liquid Fuels Platform** are committed to the climate-neutral economy by 2050, supporting a pathway which encompasses breakthrough technologies and an appropriate enabling policy framework. The Commission's Fit-for-55 package is a step in the right direction. However, we have serious concerns on the lack of recognition of the renewable and low-carbon liquid fuels as a crucial element to the decarbonisation of transport and the value of multiple technological pathways to achieve both 2030 and 2050 targets respectively.

We believe that the proposed revised regulation on CO2 standards for cars and vans is a missed opportunity to establish the principle of technology neutrality, whilst also recognising the role of renewable and low-carbon liquid fuels to decarbonise light duty transport. The Commission has proposed an increased objective of respectively 55% and 50% reduction of CO2 emissions for cars and vans by 2030 compared to 2021. It has also introduced a 2035 target of 100% reduction which looks de facto as a ban on the sales of any internal combustion engine (ICE) vehicles, independently on whichever type of fuel is used.

Such narrow technology mandates would hamper the effectiveness of the transition, causing higher costs to society and ignoring the additional and immediate CO2 savings that renewable and low-carbon liquid fuels could achieve if allowed to be used in the existing fleets. The scale of the effort required by the 2050 decarbonisation objective is not the same for all 27 EU Member States. Indeed, millions of EU citizens and business, especially in many Central, Eastern and Southern EU Countries actually rely on older, inexpensive and often second-hand vehicles. With technological alternatives out of their reach, these EU citizens will be left behind during the transition and more significantly, low-income families will find it harder to preserve their fundamental mobility rights. Therefore, a more inclusive approach to policies for renewable and low-carbon fuels is needed. For this reason, we believe that the contributions of renewable and low-carbon fuels are necessary to attain the climate objectives the EU has set out in addition to mitigating the risk of dependency on one technology alone. Passenger mobility and achieving climate progress are both best supported by technology neutrality, decarbonising the existing fleet where necessary and supporting other energy carriers alongside electricity to achieve the lowest possible abatement costs.

Moreover, sustainable and renewable fuels can complement the EU's efforts on electrification of cars during the transition to zero-emission mobility until favourable conditions for battery-electric and hydrogen mobility are not fully and equally in place across all EU Member States.

The recognition of sustainable and renewable liquid fuels in the regulation on CO2 standards for cars and vans would support their production at scale; would offer the benefit of GHG emission reductions from the existing car fleet while ensuring an affordable mobility to the EU citizens. A crediting system for renewable fuels<sup>1</sup>, meaning sustainable and advanced biofuels, hydrogen, synthetic fuels and recycled carbon fuels as defined in the Renewable Energy Directive would mitigate the above-mentioned limitations of the revised CO2 standards regulation. This voluntary crediting system should be a voluntary and additional enabling option for OEMs to fulfil the targets of the CO2 standards regulation by using additional volumes of renewable fuels.

The hard-to-abate sectors of heavy-duty road, aviation and maritime transport are still facing numerous challenges and the Fit-for-55 package emphasises a high degree of interconnectivity of all the legislative proposals in the package. The technologies for sustainable and renewable fuels are capital intensive and road transport can play a critical role as a lead and already regulated market could promote the swift scale up these fuels for the benefit of aviation and maritime.

To meet the 2050 climate-neutrality goal, the **Renewable & Low-Carbon Liquid Fuels Platform** believes that Europe and its consumers need a holistic plan where low-carbon liquid fuels, electrification and hydrogen in road transport sit side by side.

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<sup>1</sup> <https://www.crediting-system-for-renewable-fuels.eu/>