eFUEL ALLIANCE CALLS FOR A MORE AMBITIOUS IMPLEMENTATION OF RED III AS PART OF A COMPREHENSIVE AND COORDINATED NATIONAL CLIMATE POLICY

RECOMMENDATIONS

- ***The agreed greenhouse gas reduction target of 14.5% in the transport sector by 2030 should be raised to at least 20% in order to*** *incentivise the fuel industry to invest in sustainable renewable fuels and meet the climate targets. Similarly, the* ***energy target*** *should fulfil* ***at least 23% renewable energies*** *even without multiple crediting. The EU target of 29% includes various multipliers. With the reintroduction of multiple crediting, an energy quota would have to reach at least 49%.*
- *To facilitate the ramp-up of a hydrogen market and send clear investment signals, the combined quota of 5.5% for advanced biofuels as well as hydrogen and eFuels (RFNBOs)* ***should be separated*** *- with the sub-quota of RFNBOs* ***being increased*** *to* ***at least 5% from 2030****. We also recommend an interim target of 1% RFNBOs in 2028. The more ambitious RFNBO quota is necessary to* ***meet most national hydrogen strategies and to capitalise on scaling effects****.*
- *These ambitious targets are only achievable with stable and supportive political frameworks.* ***Constantly changing political conditions are poison for investment security.*** *To overcome first mover disadvantages funding schemes like the European Hydrogen Bank or H2 Global should be expanded. In addition, the* ***European energy taxation should be revised*** *to incentivize renewable fuels as proposed by the EU-Commission.*
- ***Multipliers that mathematically increase the share of renewable energies do not lead to real capacity and should be abolished in a timely manner.*** *In the short term, we welcome the steering effect of double counting of advanced biofuels and RFNBOs. We also respect the additional multiple crediting by a factor of 1.5 for use in aviation and shipping. Nevertheless, we would like to point out that sufficient quantities of eFuels are needed to achieve the climate targets. Multipliers must go hand in hand with ambitious quotas in order to create production capacities. We propose that multipliers are used to incentivize an overachievement of quotas.*
- ***Sectors should not be played off against each other.*** *eFuels are needed in aviation and shipping as well as in road transport, off-road, rail, the heating market and industry. The production of eFuels often results in a variety of by-products that can be used in a multitude of sectors. Any artificial restriction of the area of application increases the costs for the respective sector, leads to additional risks and dependencies and slows down the market ramp-up of eFuels significantly. Conversely, an approach that is as open as possible creates the best incentive to be able to ramp up the industrialised production of eFuels as quickly as possible, especially for fields of use with a lower willingness to pay, and not to overburden any sector and its end users financially.*
- *The production of sustainable renewable fuels and eFuels in particular requires lead times and investments totalling billions.* ***A longer planning horizon beyond 2030, similar to the 'ReFuelEU Aviation' and 'FuelEU Maritime' regulations, and more legal certainty*** *are key to creating clear incentives for the construction of industrial-scale projects. Member states should outline a roadmap with yearly milestones to 2050.*
- *The certification and monitoring of renewable fuels should be continuously improved to prevent any potential fraud. We demand that no imports be authorised from countries that do not allow independent and unannounced witness audits on site.*
- *Many Central European member states are also dependent on energy imports in the long term. Generating energy from renewable sources is significantly more cost-efficient in many locations in Southern and Northern Europe, but also worldwide, than in Central Europe.* ***Energy partnerships must be formed as quickly as possible*** *in order to develop top global locations. An import strategy for renewable energy sources should be formulated. Producing countries can make their energy systems renewable and generate added value through exports. The scaling of eFuels production contributes to the global transformation of the energy system.*

GENERAL REMARKS

The eFuel Alliance strongly supports the EU target for the European Union to be climate neutral by 2050. As one of the most important legislative measures to achieve the EU climate targets, the revised Renewable Energy Directive (REDIII) should be implemented nationally as soon as possible in order to create an ambitious and level playing field for all relevant emission reduction technologies in industry and transport and to address existing fleets in particular. Only a mix of technologies can decisively accelerate the defossilisation of our economy and mobility. Currently, the transport and building sectors in particular are already failing to meet the targets in many member states e.g. Germany. It is therefore essential that the role of sustainable renewable fuels, especially eFuels (or "RFNBOs"), is given greater consideration here.

The eFuel Alliance therefore welcomes the revision of REDIII. The aim of REDIII is to promote the transition from fossil fuels to renewable energy sources more strongly. However, we are concerned that the measures adopted are not ambitious enough to realise the full potential of sustainable renewable fuels. Furthermore, the direction of REDIII in combination with the ReFuelEU Aviation, FuelEU Maritime and the CO_2 fleet regulations for passenger cars, light and heavy-duty vehicles in its entirety indicates that additional volumes of renewable fuels are to be introduced mainly into aviation and maritime transport. As a result, road mobility is forced into a pure electrification strategy and the existing fleet has no opportunity to contribute to climate protection, jeopardising investment commitments in renewable fuels (especially from fuel suppliers that do not serve the aviation or maritime transport market). Overall, this artificially delays, increases the cost of and in some cases jeopardises the affordable introduction of promising new technologies such as green hydrogen and hydrogen-based products.

Instead of putting climate protection technologies against each other, climate policy must focus on phasing out the use of fossil fuels across all sectors as quickly as possible and creating effective incentives for the production and use of all relevant CO_2 -neutral technologies, including eFuels. The EU cannot afford to ignore even one technological option for reducing greenhouse gas (GHG) emissions.

eFUELS ARE CRITICAL TO THE SUCCESS OF A SUSTAINABLE ENERGY TRANSITION

In order to achieve the European Union's climate targets and limit the global temperature rise to the 1.5 °C set out in the Paris climate targets, all sectors must significantly step up their efforts to reduce greenhouse gas emissions. The use of green hydrogen and hydrogen-based products such as synthetic fuels contributes to this.

As they replace fossil fuels, the use of eFuels could contribute to a significant reduction in CO_2 emissions - initially by blending them with conventional fuels (drop-in capability), and ultimately as a complete replacement. This could provide various sectors with a climate-neutral alternative: eFuels are suitable for all modes of transport that are powered by an internal combustion engine. In aviation and shipping, eFuels are largely without alternative. In road transport, they can supplement the expansion of electromobility with an additional climate-friendly option. This is particularly important if the demand for electric vehicles encounters challenges (e.g. due to a lack of charging stations, rising electricity prices, discontinuation of existing subsidies, etc.). eFuels will also be used in future as a raw material for the chemical industry or for steel production, and they are also a climate-neutral alternative to conventional heating oil and gas. With a gradual increase in the quantities of eFuels and falling production costs due to economies of scale, eFuels will be affordable for consumers at every stage as well as for sectors where defossilisation is difficult, such as aviation and maritime transport (hard-to-abate sectors). According to a study by Prognos AG, the Fraunhofer Institute for Environmental, Safety and Energy Technology UMSICHT and the German Biomass Research Centre DBFZ, the production costs for eFuels will fall significantly by 2050 and are expected to be between €0.70 and €1.33 per litre of diesel equivalent. **A recent study by the International Energy Agency (IEA) forecasts production costs of around €1.7 per litre in 2030.**

Another advantage of eFuels is that they are the only way to store and transport renewable energy from all parts of the world. This will be of key importance when it comes to overcoming one of the main challenges of the energy transition, namely the geographical and temporal availability of renewable energy: European citizens must have access to climate-friendly energy anytime and anywhere. However, a sufficient supply of clean energy can only be guaranteed if the electricity from renewable energies is converted into liquid and gaseous hydrocarbons (eFuels) and stored so that it can then be transported across the globe.

According to Eurostat, Europe imports more than 60 per cent of its primary energy needs. Even if we manage to significantly expand our renewable energy installations, large parts of the EU will still need to rely on energy imports to achieve the climate-neutral transition of our economy, as it is still heavily reliant on fossil fuels. **And this is where eFuels come into play: eFuels can be produced in sparsely populated regions around the world, where sun and wind are constantly available, and then shipped to Europe to provide stored renewable energy in the form of climate-neutral liquid or gaseous synthetic fuels.** Furthermore, because eFuels can - and should - be produced outside of Europe, they would not compete with the hydrogen industry for the renewable electricity that both manufacturing processes require to power their electrolysis plants. Instead, as production volumes increase, eFuels could contribute to an overall reduction in the cost of clean hydrogen through economies of scale. To fully realise these benefits and incentivise investment, a more ambitious implementation of REDIII is needed. In addition, the EU and member states should endeavour to establish energy partnerships in order to secure top global locations. Importing pure hydrogen (and not hydrogen derivatives) without a pipeline is not justifiable from an energy perspective alone.

ON THE WAY TO A CLEAN AND SUSTAINABLE MOBILITY TRANSITION

Greater consideration of the role of renewable fuels in road transport would also make it possible to better integrate the existing fleet into climate protection efforts. This is essential, as vehicles with combustion engines will continue to dominate the vehicle fleet for decades to come. In Europe, more than 200 million vehicles with combustion engines will still be on the road in 2030. **For example, an EU-wide blending of just 5% eFuels with conventional fuel could lead to a saving of 60 million tonnes of CO_2 in 2030 - the equivalent of taking 40 million cars off the road for a whole year**.[1]

The national implementation of REDIII provides an opportunity to fundamentally reassess the emission reduction potential of renewable and low-carbon fuels and to realise the opportunities offered by clean synthetic fuels and hydrogen.

A MORE AMBITIOUS RENEWABLE ENERGY DIRECTIVE

The official SHARES database from Eurostat, which takes certain multipliers for different fuels into account, comes to just 9.6% in 2022 - that is 0.6 percentage points less than in 2020. This target is below the binding 10% quota of the REDI. According to Eurostat, only 8 member states fulfil the REDI transport target, including Sweden, Finland and the Netherlands. France, Spain and Germany, on the other hand, have not reached the target, and Poland and Lithuania have not fully implemented the RED yet[2]. The EU Commission would be able to initiate infringement proceedings in these cases. So far, this has not been initiated. This inadequate development is partly due to a lack of incentives for the necessary investments in the market launch and use of renewable fuels - which in turn is a consequence of the lack of the long-term policy stability and unambitious RED targets.

In order to promote the use of renewable and low-carbon fuels, especially in transport, we consider the following policy measures to be necessary for the national implementation of REDIII:

1. Definition of more ambitious but still realisable RED-T targets for 2030

The eFuel Alliance welcomes the fact that the European Parliament and the Council agreed on new targets in March 2023. For the transport sector, the EU Commission's proposal was increased from 13% to 14.5% greenhouse gas reduction. An alternative energy target of 29% was added by the Council, which means that multiple credits for individual options have once again been included in the regulation. Originally, the Commission had proposed cancelling the multiple credits and focusing solely on GHG reduction values. A focus on the carbon content of energy sources is a more technology-neutral and effective approach to climate protection than one based on individual energy quotas. It also offers fuel suppliers more flexibility to achieve the RED targets assigned to them according to their individual situation.

However, we doubt that the level of ambition presented at EU level is sufficient to create sufficient incentives for the necessary investments in the production of sustainable renewable fuels and to significantly advance the defossilisation of the transport sector. **We therefore recommend that the member states utilise their flexibility in national implementation and set a target to reduce greenhouse gas intensity in the transport sector by at least 20% by 2030 as part of a coherent**

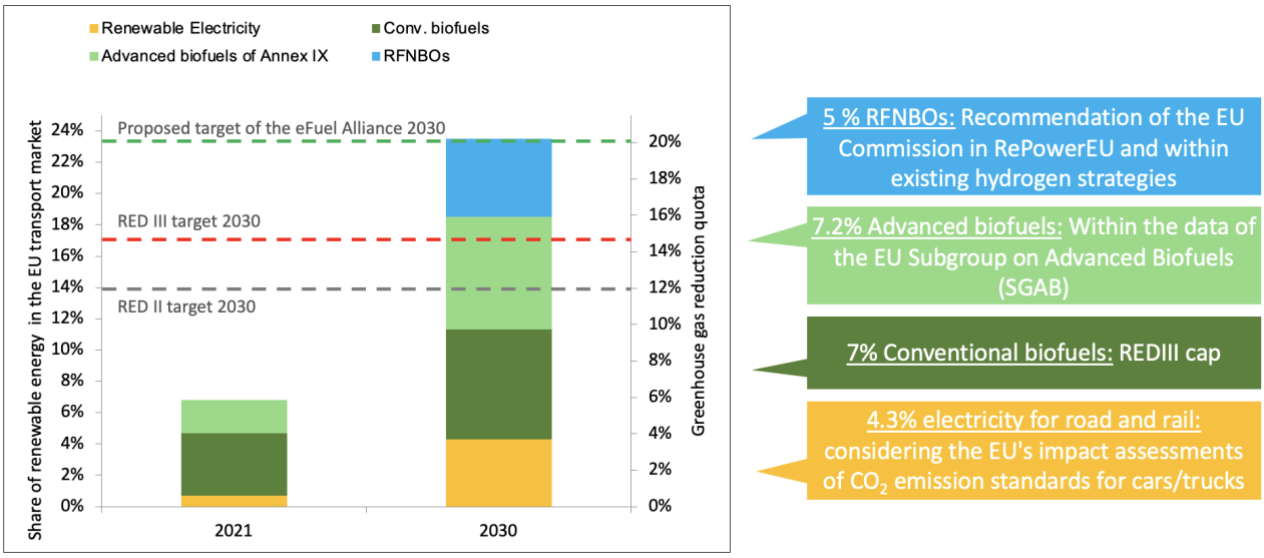
[1] According to the eFuel Alliance's own calculations

[2] See here: https://energy.ec.europa.eu/news/february-infringements-package-energy-2023-02-15_en

EU climate protection strategy at national level. This corresponds to an energy target of at least 23% - without multipliers.

Recent studies have shown that this target is ambitious but achievable. The diagram below illustrates the quantity framework that we use as the basis for our calculations of the recommended greenhouse gas reduction target without taking multiple accounting into consideration:

Fig. 1 Volume breakdown of renewable energy sources that contribute to the recommended GHG reduction target of 20 %. Without multiplier.



Source: 2021: The EU's support for sustainable biofuels in transport – An unclear route ahead by European Court of Auditors, S. 7.; 2030: Own calculation; Simplified GHG reduction factor of 0.85 for all energy carriers.

In the following paragraphs, we explain step by step each option to comply with a reduction of 20% GHG emissions in the transport sector by 2030. First, the share of electricity as a compliance option is discussed. Second, a 5% quota for RFNBOs is described and justified. Third, conventional and advanced biofuels are discussed.

The share of **renewable electricity** in a future fuel mix is the biggest unknown, as the market launch of electric vehicles is difficult to predict due to many different parameters. In the scientific follow-up assessments of the CO_2 fleet regulation for new passenger cars and light commercial vehicles (88 TWh) and heavy commercial vehicles (14 TWh), the EU Commission predicts a total electrical demand of 102 TWh in 2030. Added to this is the electrical demand for rail, which we estimate at 55 TWh. Taking into account a 65% share of renewable electricity and the forecast total fuel consumption in the EU Commission's Fit-for-55 scenario, we expect a potential contribution of 4.3% to achieving the energy target through renewable electricity in 2030. Due to the large existing fleet, even doubling the number of e-vehicles would have a minor impact on the RED-T targets. However, this option is artificially increased by a factor of 4 for charging electricity and a factor of 1.5 for electricity in rail transport on paper, without generating a corresponding climate effect.

With regards to **RFNBOs,** we see a potential of at least 5% hydrogen and eFuels by 2030. This sub-quota was also recommended by the EU Commission as part of RePowerEU after the start of the Russo-Ukrainian war in order to reduce dependence on fossil fuel imports. 5% eFuels would correspond to an electrolyser capacity of 45 GW, which would be in line with the European hydrogen strategy's target of 80 GW of installed electrolyser capacity in 2030 - 40 GW within Europe and 40 GW imported from other regions. A study commissioned by the German Ministry of Transport in cooperation with German plant manufacturers shows that this is an ambitious but realistic target, provided the industry can rely on a suitable legal framework. An analysis by the International Energy Agency shows that more than 200 eFuel projects with a potential capacity of 14 Mt have already been announced - however, only 4% of the projects have a final investment decision. With a CO_2 reduction of 90 % compared to fossil fuels (see Concawe 2022), our proposed sub-quota of 5% would correspond to a GHG reduction rate of 4.5%.

The sub-quota of 1% agreed in REDIII is clearly too low. In a publication for the Graz University of Technology, we showed that the forecast fuel demand in 2030 would only result in a demand of 36 TWh RFNBOs. After deducting the multiple crediting by a factor of 2, this results in only 18 TWh. Approximately 10 TWh are stimulated by ReFuelEU Aviation and FuelEU Maritime, so that with the multiple crediting of 1.5 for RFNBOs in aviation and shipping, the sub-quota of the RED is almost

completely covered. Additional quantities for road transport are not incentivised, which means that the climate protection potential of the existing fleet is not addressed. **The 1% quota would also only incentivise 2-3 GW of electrolysis capacity - too little to meet the targets of the hydrogen strategies**. For these reasons, member states should significantly increase the RFNBO sub-quota in national implementation. Increasing the eFuel quota will not lead to less eFuels being available in aviation and shipping. On the contrary, faster scaling and more by-products will lead to more supply and lower costs. In addition, the ReFuelEU Aviation and FuelEU Maritime guarantees a steering effect in these sectors. To incentivise investment in the short term, we also recommend setting an interim target of 1% hydrogen and eFuels in 2028.

According to the RED, **conventional biofuels are** limited to a maximum share of 7% of final energy consumption in the transport sector. With an average greenhouse gas reduction of 80% compared to fossil fuels, conventional biofuels would lead to a reduction in greenhouse gas intensity of around 5.6%.

With regards to **advanced biofuels in the RED,** the Sub Group on Advanced Biofuels (SGAB) has concluded that the advanced fuels industry could contribute between 7.2% and 10.7% of the total energy demand of the EU transport sector by 2030. This is also in line with a study by the Imperial College London, which expects an even higher availability of sustainable biomass in 2030. We conservatively assume the lower figure of 7.2%. This figure includes both advanced biofuels Annex IX Part A and Part B of the RED. Biomass from Part B has been limited to 1.7% by the EU. A CO_2 reduction of 90% compared to fossil fuels leads to a greenhouse gas reduction of 6.5 % through advanced biofuels.

Detailed studies confirm that the production costs for advanced biofuels are lower than for RFNBOs until 2030 and beyond, so the combined quota of 5.5% for advanced biofuels and RFNBOs is likely to be met mainly by advanced biofuels. **We recommend introducing separate quotas for advanced biofuels and RFNBOs due to different technologies and levels of development.** Both technology pathways require significant long-term investment and are both needed to ramp up availability of fossil free fuels. Hence, Member States should keep the dedicated Annex IX A sub target, separate from a RFNBO sub target, in place for 2030. The level for Annex IX A should be at least the level that was implemented under RED II. The Annex IX A list has been, and continues to be, a special list of preferred feedstocks for EU biofuels, and investments in developing feeds. Keeping both targets separate would ensure long-term investment security for both technology pathways.

It is very unfortunate that REDIII only sets targets and mandates up to 2030. Hydrogen and eFuel plants will be in operation for at least 25 years. A long-term political framework is necessary for an investment decision as it is the case for the aviation and maritime sector. The eFuel Alliance would very much welcome it if member states could provide an outlook up to 2050 in the national implementation of REDIII in order to provide planning security on the one hand and initial indications for the upcoming revision of REDIII in 2027 on the other.

2. Very different starting situations in EU member states

The member states had to update their national energy and climate plans (NECPs) by the end of June 2023. The analysis of the NECPs shows that various member states want to significantly exceed the REDIII targets. Finland, for example, has announced a combined quota of 10% for advanced biofuels and RFNBOs. This corresponds to a demand of at least 3.5 TWh based on Finland's current fuel requirements. Spain has so far announced the highest quota for RFNBOs. At 3.6%, the RED-T targets would be significantly exceeded and a demand of approx. 12 TWh would be generated. Germany has announced 2.8% (18.7 TWh) and Italy 2% (9.4 TWh). **Germany, Spain and Italy alone would therefore generate almost 40 TWh of demand and exceed the demand of the entire EU RED sub-quota**. Even though it is probable that multiple counting must be taken into account, the analysis shows that some member states see a significantly higher potential for hydrogen and eFuels. Other member states that only submitted their NECPs after the REDIII was agreed, such as Belgium, the Czech Republic, Hungary, Poland and Greece, are strictly adhering to the EU minimum quota of 1% - which will lead to further demand.

More ambitious sub-quotas are also important for achieving the national hydrogen strategies. Germany has a target of 10 GW of installed electrolysis capacity in 2030, but with the RED-T sub-quotas, only 2.3 GW of electrolysis capacity would be in demand.[3] It is unlikely that additional demand from less solvent sectors such as industry, heating or the energy sector would realise the remaining 7.7 GW. For this

[3] Taking into account the multiple crediting and an average of 4,000 full load hours

reason, the RFNBO quota for the transport sector must be significantly increased if the goals of the hydrogen strategy are to be achieved.

Some NECPs are directly criticised by the EU Commission. For example, in its response of 18 December 2023, the Commission calls on France to: "*Include further information on the pathway to achieve a sub-target for advanced biofuels and RFNBOs in transport to ensure that the minimum share of RFNBOs is met in 2030".* France has not provided any specific information on RFNBOs in the transport, industrial or heating sectors. France's hydrogen strategy includes an electrolysis capacity of 6.5 GW in 2030 and 10 GW in 2035, while Portugal is planning an electrolysis capacity of 5.5 GW in 2030. Other member states that have been criticised by the EU Commission for a complete lack of information on RFNBOs include Denmark, Sweden and the Netherlands. The NECPs of Romania, Bulgaria, Estonia, Latvia, Ireland, Slovenia and Slovakia also lack clear information on quotas for RFNBOs. Unfortunately, the NECP of Austria is still missing in March 2024.

The analysis of the NECPs shows that, on the one hand, the majority of member states do not yet have a sufficient plan for the expansion of RFNBOs in the transport sector - despite some existing, ambitious hydrogen strategies - and, on the other hand, the very low minimum quotas for hydrogen and eFuels in the EU are already exceeded by three states (Spain, Italy and Germany).

3. Dealing with multiple credits in the REDIII

The eFuel Alliance continues to be critical of the application of multipliers to certain energy sources, as it inflates their share in the transport sector in purely mathematical terms and does not contribute to actual climate protection. In addition, the current multiplication factor for charging electricity, which is higher than for other energy sources, represents an inappropriate favouring of a particular technology. This is not in the interests of fair competition and technological openness. Multiple charging can also be organised in different ways, which could lead to the development of a fragmented market in Europe.

The eFuel Alliance has therefore supported the Commission's proposal to remove the possibility of using multipliers when calculating the minimum shares of renewable energy in the future. This is an important step towards creating a level playing field for all emission reduction technologies and achieving better overall real results in reducing greenhouse gas emissions.

In addition, **we would like to propose that multipliers are used to incentivize over fulfilment of the quota**. If a company that supplies fuels to the transport sector brings significantly more RFNBOs onto the market than stipulated in the aforementioned sub-quota, the energy quantity in excess of the sub-quota should be eligible for multiple offsetting. A similar mechanism has been implemented in FuelEU Maritime with double counting for shipping companies.

In the short and medium term, multipliers enable a steering effect in favour of certain technologies, including eFuels, and enables business models through the multiple crediting of CO_2 avoidance costs. On the other hand, this significantly reduces demand. Without multiple crediting, 36 TWh of hydrogen and eFuels would be required in the EU in 2030 to fulfil the RFNBO quota of 1%. With multiple crediting, the figure is around 10 TWh. For these reasons, we recommend a clear exit from multiple credits in the long term.

4. Less complex, better monitoring of regulations and policy stability are essential for planning and investment security

The RED has always consisted of an extremely complex set of regulations, compliance with which costs the industry a lot of resources. Unfortunately, REDIII does little to change this. On the contrary - further complex regulations for RFNBOs have been added in the course of the RED, such as the delegated acts, which stipulate that grid-connected plants may only obtain electricity for the production of hydrogen and eFuels from new renewable energy plants (not older than 36 months) and that the electricity procurement must be temporary and geographically correlated. Until 2030, the time-based verification is to take place monthly - from 2030 onwards on an hourly basis. A study by the universities of Cologne and Harvard shows that the switch from monthly to hourly correlation will increase hydrogen costs by a quarter. Other users of electrical energy such as electric cars or heat pumps do not have to fulfil these conditions and therefore have a competitive advantage. In addition, potential CO_2 sources to produce eFuels are limited. Technically unavoidable industrial sources such as cement plants will also no longer be allowed to be used from 2041 and must be part of an effective CO_2 pricing system. In a joint letter with 17 other European associations, we are calling on legislators to adopt more pragmatic regulations so as to not nip a potential hydrogen market in the bud. Unfortunately, no companies have yet been

approved by the EU Commission for the certification of RFNBOs by March 2024 - further delaying industrial production.

Policy stability is key for capital-intensive investments as renewable fuels. If regulations are frequently changed the confidence of the financial market will decrease. **Therefore, we call for a grandfathering for projects, which are already realized or which already have a final investment decision**. These projects should be exempt from regulatory changes.

It is also disappointing that the Union database for renewable fuels, announced at the end of 2018, is not yet fully functional after more than 5 years of development. A rapid and sound realisation of the database would allow full transparency and potential for additional verification of flows of materials and their sustainability criteria from end to end. Current gaps in testing should also be closed. On 16 August 2023, the EU launched an investigation into Chinese biodiesel imports. It is suspected that in this case certificates were issued without auditors being able to carry out unannounced inspections, as auditors in China do not have free access. This has significantly reduced the CO_2 avoidance prices for renewable fuels in many member states over the past year and postponed investment decisions. **We call on the Member States to only carry out certifications for renewable fuels if unannounced on-site inspections are possible.**

The use of green hydrogen in refineries is a cost-efficient way to leverage the GHG reduction. The RED explicitly imposes the so-called refinery route (RFNBO used as intermediate products to produce conventional transport fuels or biofuels) as a compliance option for fuels suppliers. The directive aims at incentivizing the ramp-up of green hydrogen production in Europe in order to develop a large-scale hydrogen economy. Respective business cases naturally rely on robust regulatory frameworks with transparent rules and clear investment signals by the EU level as well as in the member state transposition. Unfortunately, different member states plant to implement the refinery route differently. Germany plans to allow the RFNBO refinery route as a compliance option within the national GHG mandate. However, if the RFNBO refinery route is used outside of Germany (when fuels are being supplied to the German market) it is not eligible according to first drafts. This restriction potentially contradicts the EU single market principle and creates distortions among market players and restrains potential investments in a European green hydrogen economy. **The GHG mandate should recognize as compliance option the use of RFNBO in a refinery also in other countries if the final fuel is supplied to the German market**.

In order to achieve the more ambitious 2030 climate targets, all available sustainable energy sources must be expanded. In addition to electricity-based synthetic fuels, this also includes sustainable biofuels. A broad raw material base that ensures the production of such renewable fuels is therefore of enormous importance. However, the ongoing and future planned reviews of the Annex IX should not include removal or downgrading feedstock previously included in the advanced feedstock list as this would undermine past and future investments. In order to further increase synergies between biofuels and eFuels, it would be important for the EU Commission to define low-carbon hydrogen and synthetic fuels from biomass more precisely as soon as possible.

ABOUT THE eFUEL ALLIANCE

The eFuel Alliance is an interest group that campaigns for the political and social acceptance of eFuels and for their authorisation. We represent more than 180 companies, consumer organisations and associations along the eFuel production value chain. 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 want to ensure that the significant contribution of eFuels to sustainability and climate protection is more widely recognised. Our goal is to enable the industrial production and widespread use of CO_2 -neutral fuels from renewable energy sources.