

Press release on the open letter to the European Commission on the risk of failure to meet long-term climate protection goals in the transport sector due to insufficient legal regulations

Dear Ladies and Gentlemen,

We, the undersigned scientists of the attached open letter, hereby announce the sending of the same to the European Commission on 17 June 2021.

The reason for this is the planned changes in the legal regulations especially of the Energy Taxation Directive, the CO₂ fleet regulation for passenger cars and heavy-duty vehicles as well as the Renewable Energy Directive.

It is about climate protection in transport. Even though the topic of the "Corona pandemic" is currently dominating the media, we must not lose sight of the topic of "climate protection". We would therefore like to inform not only the political decision-makers but also the public that we are convinced that the European Commission is about to set the wrong course in climate protection in transport, which - regardless of the current temporary greenhouse gas-reducing effects of the Corona pandemic - will lead to a long-term failure to achieve the climate protection goals.

However, we expressly do not want to denounce the EU Commission, but to enter into a constructive dialogue in order to support the efforts of the EU Commission for the best possible climate protection to the best of our ability. With this important topic, which ultimately affects the whole of society, we are interested in the greatest possible transparency and comprehensibility, so we want to keep the public informed about it.


In view of the enormous and ever-increasing time pressure, we believe that we can no longer afford any omissions or mistakes in climate protection. Climate protection measures must take effect immediately when implemented. Therefore, we want to stimulate a broad discussion of this topic on a scientific basis and call for a transparent and technology-neutral climate protection policy that is oriented towards real physical greenhouse gas reductions across the entire value chain. In this respect, we see considerable need for improvement in the planned changes to the legal regulations.

The current regulations still represent an exaggerated one-sided promotion of electromobility. For example, the CO₂ fleet regulation counts electromobility as having zero CO₂ emissions, while renewable fuels are not taken into account at all. On the one hand, this is a serious violation of the principle of technology neutrality and prevents a fair competition between different solutions, each measured in terms of the actual greenhouse gas reduction. Secondly, it disregards the laws of nature, because the climate only reacts to real physical greenhouse gas quantities, not to factors arbitrarily set by politicians for the accounting of measures. Moreover, there is a lack of transparency here, as the EU Commission has not disclosed any calculations to the public on what real greenhouse gas reduction can be expected from this measure across the entire value chain including the installation of new infrastructure. On the basis of the scientific studies available to us, we rather come to the conclusion that electromobility in the period up to 2030, which will be decisive for the long-term success or failure of climate protection, will in all likelihood not lead to any significant greenhouse gas reduction over the entire value chain¹, and is therefore ruled out as a medium-term climate protection measure. In particular, the greatly increased CO₂ emissions from the construction of battery electric vehicles, the high share of fossil fuels in electricity production that will still exist for a long time, the enormous expense of building new infrastructure for charging stations, and the fact that electromobility does not bring any new renewable energy into the system, but rather ties up renewable potential of the electricity sector in the transport sector that is then lacking elsewhere, such as in industry, must be taken into account.

We see other solutions such as sustainable greenhouse gas reducing alternative fuels (liquid and gaseous fuels including renewable hydrogen, renewable methane and others) which we believe are far more effective because they would be immediately effective in real greenhouse gas reductions in the huge existing vehicle fleet including gas powered cars if implemented and do not require new infrastructure. Legal regulations urgently need to create a level-playing field for these options. Such alternative fuels include not only the biofuels currently on the market, which are predominantly by-products of animal feed production and already in significant quantities also products from food waste, but also advanced biofuels produced from wastes and residues from agriculture, forestry, the timber industry, the food industry and the like. Furthermore, this includes alternative fuels based on non-biogenic waste materials, such as plastic waste, as well as electricity-based fuels, so-called PtX fuels (Power-to-X) or e-fuels and highly efficient hybrids, i.e. fuels based on both residues or waste and electric power. Pure e-fuels could, for example, be produced in countries with a surplus of renewable energy and imported to Europe. The required carbon dioxide could be captured directly from the air. The technologies for this could well come from Europe which would create more than one million new jobs in Europe according to a current study². By introducing such e-fuels, Europe would have the chance to contribute to covering its very large energy import demand on a renewable energy basis. In addition, this would advance the international cooperation urgently needed for climate protection. After all, climate protection is a global task.

We have supported our demands with relevant literature and hope to initiate a professional discussion.

Yours Sincerely,



Prof. Dr.-Ing. Thomas Willner

Hamburg, 17 June 2021

Attachment: Open letter to the EU Commission

¹ https://www.fvv-net.de/fileadmin/user_upload/medien/pressemitteilungen/FVV_LCA_Life-cycle_analysis_Frontier_Economics_R595_final_2020-06_EN.pdf

² https://www.iwkoeln.de/fileadmin/user_upload/Studien/Gutachten/PDF/2021/Gutachten-Synthetische_Kraftstoffe_Europa_englisch.pdf

Ms Ursula von der Leyen, President of the European Commission
Mr Frans Timmermans, Executive Vice-President and Commissioner of the European Commission – Climate Action
Ms Kadri Simson, Commissioner of the European Commission - Energy
Mr Thierry Breton, Commissioner of the European Commission – Internal Market
Ms Adina Valean, Commissioner of the European Commission – Transport
Mr Mauro Petriccione, Director General of the European Commission – Climate Action
Ms Ditte Juul-Jørgensen, Director General of the European Commission – Energy
Ms Kerstin Jorna, Director General of the European Commission – Internal Market
Mr Henrik Hololei, Director General of the European Commission – Mobility and Transport

17 June 2021

Subject: Open letter to the European Commission on the risk of failure to meet long-term climate protection goals in the transport sector due to insufficient legal regulations

Dear President von der Leyen,
Dear Executive Vice-President Timmermans,
Dear Commissioner Simson,
Dear Commissioner Breton,
Dear Commissioner Valean,
Dear Director General Petriccione,
Dear Director General Juul-Jørgensen,
Dear Director General Jorna,
Dear Director General Hololei, Dear Sir or Madam,

We, the undersigned scientists, call on the European Commission to design the further development of legal regulations for climate protection in the transport sector in a way that is technology-neutral and primarily based on the criteria of sustainability and the real, physical reduction in greenhouse gas emissions (GHG). The undersigned are convinced that the planned changes in the legal regulations especially of the Energy Taxation Directive, the CO2 fleet regulation for passenger cars and heavy-duty vehicles as well as the Renewable Energy Directive inadequately address these points for setting essential and sustainable framework conditions for long-term climate protection. The currently proposed changes would lead to the EU missing its long-term climate targets, regardless of the temporary effects of the corona pandemic.

Our main requests are:

1. The expected real GHG reductions of the planned measures are to be disclosed, and set transparently under consideration of the remaining CO2 emissions budget of the EU in the context of the objective to limit global warming to 1.5-degrees C.
2. The potential of GHG reductions through sustainable alternative liquids and gaseous fuels is to be used without restriction.
3. All climate protection measures should be accounted for in the GHG reduction quota solely based on their real GHG reductions (i.e. no multiple counting; see point 4).
4. Multiple counting of individual measures or technologies on the GHG quota obligation is to be rejected.
5. Every climate protection measure must be subject to equally strict sustainability criteria that take into account ecological, social and health impacts across the entire global value chain, while being technology-neutral.
6. Against the background of the immense and ever-growing time-pressure in mitigating climate change, the following criteria for climate protection measures should be met:
 - a. They have to lead to real GHG reductions without delay.
 - b. They must not cause any export of GHG emissions or of carbon leakage across the entire global value chain and under consideration of sector couplings.
 - c. It must be possible to apply them globally and quickly.

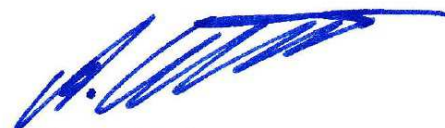
We hope to enter into a professional discussion with you in order to explain the complex interrelationships and background for our demands, also on the basis of the relevant literature in the appendix.

Thank you for your consideration.

Yours Sincerely,



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The scientists named in this list sign the open letter as private individuals

Appendix:

Literature to substantiate and concretize our demands:

DECHEMA/ProcessNet 2018: Advanced alternative liquid fuels: For climate protection in the global raw materials change. Position paper of the ProcessNet Working Group „Alternative Liquid and Gaseous Fuels“.

https://dechema.de/dechema_media/Downloads/Positionspapiere/2018_alternativeBrennstoffe_en.pdf

IPCC 2018: Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emissions pathways in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

<https://www.de-ipcc.de/256.php>

B. Buchspies, M. Kaltschmitt 2018: A consequential assessment of changes in greenhouse gas emissions due to the introduction of wheat straw ethanol in the context of European legislation. Applied Energy 211 (2018) 368-381

<https://www.sciencedirect.com/science/article/abs/pii/S0306261917315477?via%3Dihub>

Frontier Economics 2020: Cradle-to-Grave Life-Cycle Assessment in the Mobility Sector. A Meta-Analysis of LCA Studies on Alternative Powertrain Technologies.

https://www.fvv-net.de/fileadmin/user_upload/medien/pressemitteilungen/FVV_LCA_Life-cycle_analysis_Frontier_Economics_R595_final_2020-06_EN.pdf

T. Willner 2020: Climate Protection in the Transport Sector – The Key Role of Alternative Fuels. In: J. Werner, N. Biethahn, R. Kolke, E. Sucky and W. Honekamp (Eds.): Mobility in a Globalised World 2019. University of Bamberg Press, ISBN 978-3-86309-731-8, Bamberg, May 2020, pp 261-289

https://fis.uni-bamberg.de/bitstream/uniba/47670/3/fisba47670_A3a.pdf