



ePURE's Position on FQD Art. 7a Implementation Proposal

Proposal COM(2014) 617 for a Council Directive on laying down the calculation methods and reporting requirements pursuant to Directive 98/70/EC of the European Parliament and of the Council relating to the quality of petrol and diesel fuels (FQD)

European renewable ethanol has a crucial role to play in decarbonizing the transport sector, whose emissions have increased by 36% since 1990¹ and has now become the biggest source of emissions in the EU, accounting for 30% of its total emissions². With actual average emissions savings of more than 60% compared to fossil fuel, European renewable ethanol is the most cost-effective means³, available at scale, to substantially reduce emissions in the transport sector.

The European renewable ethanol industry association (ePURE) believes a proper implementation of the Fuel Quality Directive is vital to achieving Europe's existing and future overall GHG emissions targets. While ePURE welcomes that after years of intense debate, a proposal has been published that would allow the implementation of Article 7a of the Fuel Quality Directive, the Commission proposal fundamentally undermines the 6% decarbonisation objective and the role of ethanol in helping to achieve it.

By establishing the fuel baseline at 94.1gCO₂/MJ, the proposal acknowledges that fuels are more carbon intensive than previously estimated⁴. This technical implementation proposal means in effect a lowering of the EU's political decarbonisation ambitions as less effort will be required from fuel suppliers to achieve the objective. In effect, applying the 6% decarbonisation target to a baseline of 94.1gCO₂/MJ, instead of 83.8gCO₂/MJ, would result in around 7 million tonnes of extra CO₂ emissions⁵.

The 6% decarbonisation target was a crucial part of a finely balanced Climate and Energy package adopted in 2009. Relaxing one of the targets could pave the way to undermine the other 20-20-20 objectives. It would also be clearly contrary to the renewed calls by the European Parliament⁶ and Council⁷ to decarbonize the transport sector as part the 2030 Energy and Climate policy framework.

The Commission proposal invites the legislator to make a decision on a baseline without considering the decarbonisation targets, while the two are intrinsically linked. The proposal, if implemented as is, will allow fuel suppliers to reach the 6% objective without the need for low carbon fuels in the proportion envisaged in 2009, or through reduced upstream emissions, without a proper methodology to calculate and monitor these. Such an inappropriate implementation of the FQD would set a dangerous precedent that the EU is backtracking on its ambitions to tackle the challenge of the much-needed decarbonisation of the transport sector, hinders investments in low carbon technologies and undermines energy security. **ePURE therefore calls on the European Parliament and Council to vote against the implementation proposal by the European Commission.**

¹ [European Commission, DG CLIMA, 2014](#)

² [EU energy in figures, Statistical Pocketbook, 2014](#)

³ [The Role of Biofuels Beyond 2020, Energy Element, 2013](#)

⁴ The Fuel Quality and Renewable Energy Directives both use the figure of 83.8g CO₂/MJ as the fossil fuel comparator against which biofuels GHG savings are measured.

⁵ ePURE's own calculation

⁶ European Parliament resolution of 5 February 2014 on a 2030 framework for climate and energy policies ([2013/2135\(INI\)](#))

⁷ [European Council \(23-24 October 2014\) conclusions](#)