

ePURE position	European Commission proposal for post-2020 light vehicles CO ₂ targets
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Sustainable low-carbon liquid fuels like European ethanol are essential to achieving the emissions-reduction goals of the EU's Clean Mobility Package. A realistic approach to clean mobility requires incentivising sustainable low-carbon liquid fuels as an immediate, cost-effective solution to decarbonising transport with existing infrastructure and internal combustion engines that will still be prevalent on the road in the coming decades.

The EU's Clean Mobility Package aims to reduce road-transport emissions in the long term. However, by focusing solely on tailpipe emissions, it fails to consider the contribution of low-carbon liquid fuels such as renewable ethanol, both in terms of emissions reduction and energy efficiency.

- With the discontinuation of the obligation to decrease the GHG intensity of transport fuels post-2020 (Art. 7. a. of the Fuel Quality Directive), the Commission's overall policy framework to decarbonise transport no longer encompasses the full life-cycle of transport fuels. No link exists anymore between the Renewable Energy Directive regulating the sustainability of alternative renewable fuels and their use in light-duty vehicles. This effectively rules out existing solutions such as renewable ethanol.
- The EC proposal does not incentivize decarbonisation through fuels improvements, such as sustainable biofuels. There is no sufficient commitment to decarbonise future new conventional cars (ICEVs), even though this will continue to be an urgent need post-2020. For these and the existing fleet, sustainable low-carbon liquid fuels represent a cost-effective, available at scale and readily deployable solution, as stated in the Commission's [study](#) on the impact of higher levels of bio component in transport fuels.

As the process of deciding on the post-2020 light vehicles CO₂ standards begins, ePURE – representing European renewable ethanol producers from conventional and advanced feedstock – calls on the co-legislators to consider the following key policy recommendations:

1. Adopting a technology neutral approach to realistically decarbonise EU transport sector

- The “tank-to-wheel” approach is outdated as it does not account for the emissions impacts of different powertrain technologies and their fuels. By focusing only on tailpipe emissions, the approach:
 - ignores the total environmental footprint of the fuel and the car;
 - overlooks the significant environmental benefits of certain alternative fuels;
 - fails to incentivise the use of better fuels; and
 - favours one powertrain technology at the expense of other effective available solutions.
- Adopting a full lifecycle analysis approach to counting emissions would have resulted in a proper comparison between efficient ICE, hybrid and electric vehicles and disbanded the EU myth of so-called “low” and “zero-emission” vehicles. Consumers should also be informed of the carbon footprint of the fuels in use.
- ICEVs and hybrid vehicles (running at least partly on conventional liquid fuels) will still represent an important, if not the major, share of new car sales in the coming decades. Ethanol is an important transition fuel towards a low-emission transport sector. The Regulation should seek to achieve the decarbonisation targets through the best mix of future efficient internal combustion engines/hybrids and EVs.

2. Ensuring policy continuity and consistency

- By abandoning the approach of the Fuel Quality Directive to promote lower-GHG fuels, the EU prevents fuel suppliers from contributing to decarbonisation targets today – and auto manufacturers from adapting their technology to (higher) blends of alternative fuels.
- **The lower carbon footprint of the fuels should be recognized and maintained in the Regulation:**
 - **The bonus for E85 compatible cars should be reinstated and its granting facilitated to ensure a larger uptake;**
 - **Additional measures corresponding to a reduction of 10 g CO₂/km, incl. the blending of sustainable biofuels, should be maintained for the period 2025-2030.**

3. Promoting conventional fuels improvements and the deployment of low-carbon liquid fuels

- While the expected uptake of EVs requires massive infrastructure development, many of the clean mobility benefits of existing and future biofuel blends can be harnessed within the current infrastructure.
- Additionally, efficiency benefits are expected to play an important role in the cars decarbonization: ethanol provides an easily accessible octane boost for the fuels.
- **Blends of petrol with higher content of ethanol (E10+) should be incentivised above the existing FQD limits in order to favour their deployment, which is already happening outside the EU.**