ePURE
european renewable ethanol

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ePURE's position on CO_2 emissions standards for cars and vans: Recognising sustainable crop-based biofuels to ensure technology neutrality

ePURE - the European Renewable Ethanol Association- represents bioethanol producers from crops, wastes and residues all committed to sustainable transition towards zero-emission mobility. Renewable ethanol is a certified, sustainable fuel that significantly reduces greenhouse gas (GHG) emissions compared to fossil oil and is recognised by EU policy as an accelerator of decarbonisation of road transport.

The Commission's proposal on the CO_2 standards review is a missed opportunity and creates inconsistency. Despite earlier statements made by Climate Commissioner Wopke Hoekstra acknowledging the role of crop-based biofuels, the proposal recognises only e-fuels and advanced biofuels after 2035, **arbitrarily excluding sustainable crop-based biofuels and ignoring a proven decarbonisation pathway.** The revision of the CO_2 regulation for cars and vans takes an inconsistent approach: the 2035 target is measured using a tailpipe-based methodology for 90% of compliance, while the remaining 10%—which can be met through renewable fuels (3%) and low-carbon steel (7%) —is assessed using a lifecycle approach.

A genuinely technology-neutral approach cannot disregard sustainable solutions already deployed at scale across the EU. The restrictive treatment of some biofuels prevents true technology neutrality from being fully reflected in the regulation. **This misalignment with the Renewable Energy Directive (EU) 2018/2001 (RED) framework and the EU's broader decarbonisation strategies** risks sidelining an industrial sector that supports farmers and rural economic revenues with proven, immediately available low-carbon solutions.

What can be improved?

To fully leverage renewable fuels and ensure technology neutrality, the framework should be strengthened as follows:

Expand the scope of Article 5a to include all RED-compliant and certified renewable fuels, including sustainable crop-based ethanol, consistent with RED sustainability and GHG criteria.

The proposal does not include an inclusive definition of sustainable renewable fuels in its article 5a. Instead, renewable fuels are limited to only Renewable Fuels of Non-Biological Origins (eFuels) and RED Annex IX biofuels and biogas (advanced biofuels), thereby excluding renewable ethanol produced from sustainable agricultural feedstocks. This narrow scope is inconsistent with the definition in RED, which demands third party certification of sustainability and minimum greenhouse gas emissions saving criteria for a wide range of renewable fuels and recognises their contribution to transport decarbonisation. Therefore, **ePURE recommends an approach that covers all sustainable renewable fuels that are RED-compliant.**

- The Working Group on Monitoring Methodologies (WGMM)[1] has established a balanced and practical definition stating that "CO_2 neutral fuel" means all fuels defined by the RED, provided that they meet the sustainability criteria of that Directive and associated delegated acts, where the same amount of CO_2 from biomass, ambient air or recycled carbon sources is bound in the fuel production as is released during combustion in the use phase. Those fuels shall include renewable and/or synthetic fuels, such as biofuel, biogas, biomass fuel, renewable liquid and gaseous transport fuel of non-biological origin or a recycled carbon fuel.

[1] Working Group on Monitoring Methodologies. Monitoring the use of CO2 neutral fuels in road transport, a cross-sectoral industry assessment, 2024.

Rue de la Loi 223
B-1040 Brussels
+32 2 657 66 79
info@epure.org
epure.org
@ePURE_ethanol

Enhance the renewable fuel crediting system by removing the 3% cap threshold.

The 3% cap for renewable fuels is disconnected from the growing share and proven climate performance of RED-compliant fuels already used on the EU market. To provide real technological flexibility, **the 3% cap should be significantly increased to provide space for all RED-compliant and certified renewable fuels,** including bioethanol from sustainable feedstocks. Eligible renewable fuels should be credited based on their real and verified life-cycle emission reductions, enabling their full contribution to manufacturers' compliance with CO_2 emission targets. The existing cap limiting the contribution of fuel credits to compliance with CO_2 emission standards to 3.3 g CO_2/km needs to be removed.

- If all renewable fuels placed on the EU market for road transport complying with the sustainability criteria of the RED were taken into account, fuel credits could reduce manufacturers' effective emission standards by nearly 15 g CO_2/km in 2025 (in which crop-based ethanol could provide up to 2,68 g CO_2/km alone) and by up to 25 g CO_2/km by 2035. This approach would better reflect the real decarbonisation potential of sustainable renewable fuels and support technology neutrality alongside vehicle electrification.

Bring forward the application of article 5a to 2030 to align with RED III 2030 transport targets.

Setting the starting date in 2035 will not foster a real uptake of sustainable renewable fuels. To better reflect the role of renewable fuels in decarbonisation of transport, an early application of **the fuel crediting system under article 5a should apply as of 2030.** This would effectively encourage car manufacturers to increase the use of sustainable renewable fuels, **as well as ensuring coherence with the RED III targets for road transport in 2030 and the full implementation of the Union Database for Biofuels (UDB).**

The role of renewable ethanol in defossilising road transport

Renewable ethanol is a **proven, scalable and immediately available solution** to reduce GHG emissions from road transport. Renewable fuels deliver significant life cycle GHG emissions savings compared to fossil gasoline, in line with the RED strict sustainability criteria. For instance, the average certified GHG emissions savings of ePURE's renewable ethanol against fossil fuels have is 79% in 2024.[2] It can be blended with conventional fuels and used in today's vehicle fleet **without additional infrastructure or vehicle replacement**. This allows for **rapid emissions reductions at low cost**, particularly important during the transition period to 2035.

The use of sustainable renewable fuel **complements the electrification of road transport**. Both electric vehicles (BEV) and vehicles powered exclusively by RED-compliant biofuels can play a pivotal role in reducing transport emissions. Limiting fuel credits to e-fuels and Annex IX biofuels would disincentivise PHEVs running on gasoline engines from using renewable ethanol, **even though ethanol from non-Annex IX feedstocks represented 90% of renewable ethanol** used in road transport in 2023. Excluding crop-based ethanol from the possibility of powering future vehicle fleet would create a clear policy inconsistency, disincentivise the defossilisation of road transport and undermines emissions reductions across the entire vehicle fleet.

Additionally, ePURE members' renewable ethanol is produced domestically **from sustainable European feedstocks**, supporting rural development and farmers income. Maintaining a strong first-generation biofuels market is therefore essential to **safeguarding EU agricultural production capacity and supports the competitiveness of European farming**. Increased use of renewable ethanol reduces dependence on imported fossil fuels. It provides **affordable decarbonisation options for consumers and businesses**, preserving competitiveness in a global market.[3]

[2] Source: Aggregated and audited data of ePURE members and other European producers for volumes certified under RED I or RED II methodology

[3] Nova Institute, study on 'Benefits of Using First-Generation Biomass for Food, Fuels, Chemicals and Derived Materials in Europe', September 2025

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