

Thursday, 1 December 2011

Re. the Proposal to implement the EU Fuel Quality Directive

Dear Mr. Clini,

The undersigned, a wide range of civil society groups on both sides of the Atlantic, write to ask you to support the European Commission's proposal on the implementation of the European Union's Fuel Quality Directive.

The Fuel Quality Directive (FQD) was adopted as part of the EU's landmark climate and energy package in 2008. It sets a target to reduce the carbon intensity of Europe's transport fuels by 6% between 2010 and 2020. As such, it delivers an important contribution to the decarbonisation of the transport sector – the only sector in the EU, where greenhouse gas (GHG) emissions have been growing and may well continue to do so, unless forceful action is taken.

The recent Commission proposal on the implementation of the Directive aims to assess the true carbon footprint of different types of fossil fuels (i.e. tar sands, oil shale) and ensure robust reporting. Despite the fact that the proposal does not adequately deal with refining emissions and does not enable full reporting for fuels produced from conventional crude oil, we welcome it as an important step towards a low-carbon and resource efficient economy.

The approach chosen in the Directive allows fuel suppliers to opt for the most cost-effective way to reduce their emission. However, the effectiveness and robustness of this legislation hinges on the implementing measures that you are currently discussing.

Fossil fuels represent 95% of all energy use in road transport in the European Union. Science shows that there are large differences in the way these fuels are produced, which results in a wide variation in their carbon intensity. The proposal rightly distinguishes unconventional fuels produced from coal, natural gas, oil shale and natural bitumen (or tar sands) which all typically have a greater carbon footprint than conventional fuels produced from crude oil. If Europe is serious about addressing climate change it cannot afford to use such dirty fuels.

Importantly, the proposal allows suppliers to prove that their specific extraction or production method has lower emissions than a default value. This creates an incentive to invest in more efficient processes and technologies and provides for a level playing field and fair market competition. This approach is also consistent with the EU's approach to biofuels, which is another part of the same law.

The proposal will enable the start of reporting on greenhouse gas emissions from different fossil fuels, which is critical for the timely implementation of the EU's emission reduction objectives.

This is why we would like to hear that you support the Commission proposal on the implementation of the EU Fuel Quality Directive. We would also welcome the opportunity to meet with you for an exchange of views on the proposal.

Yours sincerely,



Jos Dings, T&E Director

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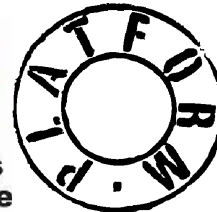
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