

ReFuel EU Aviation

FuelsEurope supports the Green Deal's ambition for climate neutrality in 2050 and will work with the EU institutions, member states, and stakeholders, to help create the essential enabling policy framework. In this EU policy framework debate on the 2030 GHG reduction target and the 2050 climate neutrality objective, the decarbonisation of transport – a sector with far-reaching implications and unique challenges- is a precious opportunity for the EU economy to:

- Develop and deploy innovative low-carbon technologies in vehicles, vessels and fuels/energy.
- Create economic value for the transport systems and to help the relevant EU industries achieve world-leadership.

At the same time, the transition should carefully address the societal aspects deriving from the changes in employment pattern, skills requirements and inequalities between EU regions and sectors of society.

The ReFuel EU aviation proposal is a step in the right direction to support the development and the deployment of sustainable aviation fuels across the Union.

Higher ambitions in decarbonisation efforts of sectors, and in particular the transport sectors, should not be required while at the same time narrowing options to achieve the desired targets:

- On the contrary, higher ambition requires access to a wider pool of feedstocks that will help to drive competition and contribute to the affordability of the decarbonisation effort. FuelsEurope therefore calls to expand the list of eligible feedstocks to all waste and residues meeting the RED criteria and to remove the cap on the use of RED II, Annex IX, part B feedstocks. At the same moment that the scope of the to be decarbonised transport sectors is widened, the double counting is eliminated and that by natural evolution over time all processes will end up as mature and so be capped in their output, is not coherent with a higher and more affordable decarbonisation ambition for the transport sectors. Therefore the unconditional cap of 1.7% by energy of Annex IX – part B feedstocks is no longer justified and needs to be removed.
- In order to ensure a more harmonised approach across the Union, we would like to see that the consideration to allow recycled carbon fuels to comply, at the Union level, rather than leaving this with the discretion of member states.

Further alignment is needed between the RED and this regulatory proposal, in particular to the possibility to take into account renewable liquid and gaseous transport fuels of non-biological origin when they are used as intermediate products for the production of conventional aviation fuels for compliance with ReFuel Aviation targets. Projects we see as most feasible in the near future include the possibility of using renewable electrolytic hydrogen to make transport fuels that would be fully compatible with today's engines. When we feed the hydrogen into the refinery's reactors, we would get a mixture of road and aviation fuels that would have the RFNBO molecule embedded in them. The possibility to account this RFNBO for fulfilment of the goals is clearly stated in the RED III proposal but it has not been included in ReFuel Aviation.

- We are of the opinion that the proposed efforts to reduce emissions from the aviation activities in Europe should improve coherence with those in place or under development at ICAO level. Therefore, there is a need to harmonize the EU initiative with the global one for the use of SAF

The other important option to produce high-quality aviation fuel using co-processing is also not acknowledged by the draft regulation, while such option is available for other forms of transport in the Renewable Energy Directive, we are of the opinion that this possibility should also be part of this regulation.

The ReFuel EU aviation proposal creates flexibility for the fuel suppliers to fulfil their obligation as an average of all their fuel deliveries across Europe from 2025 to 2029. We would like the mechanism maintained at least until 2050 to be able to capture cost efficiencies, especially in large hubs, without diminishing the overall target.

FuelsEurope is ready to work with the EU to contribute to the decarbonisation of the mobility sector in a sustainable, affordable and social inclusive way.

FuelsEurope, the voice of the European petroleum refining industry

FuelsEurope represents with the EU institutions the interest of 41 companies operating refineries in the EU. Members account for almost 100% of EU petroleum refining capacity and more than 75% of EU motor fuel retail sales.

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