ASFE’s position on the Commission’s Communication on the decarbonisation of transport

ASFE, which represents the voice of paraffinic fuels in Europe, warmly welcomes the new policy initiatives aimed at addressing greenhouse gas (GHG) and pollutant emissions from transport, including the Commission Communication on the decarbonisation of transport.

Paraffinic fuels are clean, high quality diesel fuels made from a wide variety of feedstocks, and include BTL (Biomass to liquid), GTL (Gas to liquid), as well as HVO (Hydrotreated Vegetable Oil). Paraffinic fuels are fungible and can be used at any blending rates up to 100% in current and future diesel engines. Therefore, these fuels can be distributed, stored and used with the existing infrastructure, and are available now. Paraffinic diesel fuels are recognised by the standard EN 15940.

ASFE believes that, in order to provide with an efficient policy framework to reduce the climate and environmental impact of transport in Europe, new policies will have to propose integrated, coherent and technologically neutral solutions. Therefore, the upcoming Communication should take into account the role that fuels, vehicles and transport users can play in rendering European transport cleaner.

Understanding that the Communication will promote the uptake of low-carbon fuels for transport, ASFE would like to stress the role that all alternative fuels, as described by Article 2 of Directive 2014/94/EU, will play in making European road transport cleaner.

There is no “silver bullet” solution to sustainable mobility over the coming decades. ASFE believes that only a combination of different solutions will lead to meaningful results in decarbonising transport. Each transport mode and duration will require a fit for purpose solution from the options available today. While battery electric vehicles may be suitable for urban mobility, longer distance light duty transport and heavier duty vehicle segments will require other solutions including liquid fuels. This is why we call on the Commission to consider all available fuels that have a proven potential to reduce the environmental impact of transport, both as regards greenhouse gas (GHG) emissions and other pollutants (HC, CO, SOx, NOx, CO), and that meet the fuel quality and sustainability requirements of current legislation (such as the Fuel Quality Directive).

Therefore, when it comes to alternative fuels for transport, the Communication should avoid promoting a given technology over other clean alternatives, maintaining the principle of technological neutrality.

In order to establish efficient policy frameworks delivering concrete progress towards decarbonisation, the climate and environmental benefits of transport fuels should be based on a well-to-wheel analysis, which should incorporate the full lifecycle of fuels combined with the performance of vehicle engines. ASFE strongly believes that the combination of alternative fuels, together with engine efficiency improvements, are the best option available today to effectively deliver climate and environmental benefits at the lowest cost.

1 To compensate the lower density of paraffinic fuels compared to conventional diesel, adjustment in injection amount may be necessary.
With this in mind, ASFE calls on the Commission to **acknowledge the potential that high-quality paraffinic fuels (EN 15940) have to contribute to making transport cleaner:**

- Paraffinic fuels significantly reduce local exhaust emissions such as particulates (up to 40%), NOx (up to 20%), HC (up to 60%) and Co (up to 75%) compared to conventional diesel fuels.
- The use of bio-based paraffinic fuels in transport, such as HVO, contributes substantially to CO2 emission reduction. Industry studies show that greenhouse gas emissions reduction is as high as 40% to 90% compared to conventional diesel fuels. Being totally fungible, such fuels can be used in higher blending in the diesel pool providing an ideal solution to meet ambitious renewables targets set in the Renewable Energy and Fuel Quality Directives.
- Paraffinic fuels are recognised by Directive 2014/94/EU as alternative fuels that can serve as a substitute for fossil oil sources in the energy supply to transport and which have the potential to contribute to its decarbonisation and enhance the environmental performance of the transport sector.

From a regulatory standpoint, new transport policies must ensure that legislation put in place is enforceable and coherent, avoiding contradictions between regulations. Furthermore, in order to ensure the transition towards a cleaner transport, new legislation should avoid disruptions in the frameworks that currently deliver on their objectives.

Therefore, ASFE calls on the European Commission to propose new policy and legislative initiatives that:

- **Integrate all players in the transport sector** that would have a role in delivering a more sustainable transport, including fuel suppliers, vehicles and engine manufacturers, transport logistics, consumers.
- **Assess the climate impact of the different fuels from a well-to-wheel approach**, in order to have a clear and more accurate view on the emission reduction potential of all fuels and technology options.
- **Recognise the potential of paraffinic fuels**, amongst others, in making European transport cleaner by setting tailpipe emission to zero for the renewable part of the fuel that the vehicle is compatible with.
- **Maintain a technologically neutral approach**, allowing all clean transport fuels available to compete in the market. If mandates on specific technologies are to be considered, such as on low-carbon biofuels, these should only cover fuels that are commercially available and that have a proven climate and environmental track record.
- **Continue building on the progress achieved by the engine efficiency targets** currently in place.

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