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# Input Platform Renewable Fuels for the call for evidence post 2030 framework

https://energy.ec.europa.eu/news/review-governance-regulation-energy-union-and-climate-action-public-consultation-launched-2025-12-18_en

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# 1 Introduction

In the last four years, the fossil fuel imports to the European market have proven to be volatile in price and vulnerable for disruptions and therefore impact negatively on Europe's energy security.

At the same time, with the use of locally available renewable electricity and (waste-based) biogenic resources, Europe can bring under control the access to renewable fuels for the various transport modalities - known for the high dependency of fossil oil imports. Such 'intra-European' deployment will also support creating new economic perspectives around new industrial production clusters for renewable fuels as well as for the building blocks required for the upcoming green chemical manufacturing industries.

The Netherlands Platform Renewable Fuels would like to point out that the renewable energy mandates in the transport sector are important instruments that can help to build out green industrial production clusters. This however requires a rethinking of these instruments.

The Platform Renewable Fuels recommends the following:

1. We propose to much stronger connect the transport mandates and the context shaped by the ETS (both 1 and 2) with a European based production base of green fuels and molecules production and the European agricultural/forestry sectors. This also contributes to access to fuels for the military
2. To establish a much stronger and strategic connection between industrial production for the fuels and the chemical manufacturing sectors. This is also required from a strategic autonomy point of view. The fuel and chemical manufacturing can share (to a large extent) the same feedstock and technology base. Integrated production offers possibilities for mutual synergetic efficiency gains, and reduces costs, by valorisation of the many (by)products.
3. Set higher transport mandates across all transport modalities, both in the RED for the national sectors and in the two regulations for the international aviation and maritime sectors, with year by year increasing mandates and expansion of scope (in particular, include all vessels in the scope of the FuelEUMaritime and extend the ReFuelAviation to all airports and aircrafts).
4. Introduce differentiation in tax tariffs between fossil and renewable fuels
5. Create a strong connection with carbon removal instruments for optimising benefits.
6. Rethink the current sustainability certification and transition to physical tracing in combination with implementing the UNTP-transparency protocol and the European digital trust tools.
7. Support biomass residue mobilisation.

*The opinions and expressions of the Netherlands Platform Renewable Fuels are based on analysis and knowledge developed for its mission and ambitions, as formulated with members. They are the sole responsibility of the Platform and cannot in any way be regarded as positions or opinions of the individual members of the Platform.*

# 2 Thinking about mandates

At first, renewable fuels and molecules are competing in an uneven competitive playing-field with fossil crude oil. This creates an unmountable barrier for the market development of renewable fuel options in all transport modes.

The costs of fossil fuels for society are higher than factored in in the price of the fossil fuel. Private citizens and societies pay in different ways for these costs, costs related to climate change in price of food and health, taxpayers' money for relief programs for extreme weather events or private losses by the increasingly uninsured damages caused by these weather events, to private properties, but also failed harvests.

The increasingly rising costs of the burning of new virgin fossil fuels are not priced in the use of fossil fuels. The emission trading system is therefore providing a helpful context, as it introduces cost for fossil carbon emissions.

Furthermore, the current central instrument for ramping up demand for renewable fuels (e/bio) are the transport mandates. These are crucial and very helpful, however a strong and long-lasting incentive for ramping up the production of renewable fuels is lacking. This may turn into a situation of scarcity of supply and therefore unnecessary high market prices for renewable fuels.

With setting targets in transport mandates for green fuels, the costs for fossil fuel and the alternatives are compared on the delta in market price by consumers in the market. It appears to end customers that the green fuels/ green energy carriers show more expensive market prices than the fossil fuels they replace. Raising the targets in the mandates will as a result be increasingly difficult for politicians to support, if this uneven level-playing-field with fossil fuels is not carefully addressed.

We would like to raise two fundamental questions concerning the post-2030 framework for renewable transport fuels based on the Dutch context.

## 2.1 How to think about the mandates in relation to accelerating ramp up of renewable fuels / energy carriers for all transport modes

Assessments (EC 2024) show that the current existing production capacity base for ethanol, FAME, HVO/HEFA is not fully exploited and offers room for optimisation for instance by finding new feedstock bases, such as intermediate crops. If the certification is not allowing sufficient new options such as intermediate crops, if new market demands are met with the same volumes, instead of creating additional volumes, scarcity of available feedstock will be increasing factored in in the price of the available renewable fuels, resulting in high market prices and eroding the political support for mandates.

This vulnerability can be addresses by diversifying the production base with new and additional, advanced technology platforms that provide access to an entirely new feedstock base. These technologies have already high Technology Readiness Levels (TRLs), but face difficulties in finding their way to the market and compete with the existing production capacity that have been created with the transport mandates.

### What to do?

How to make it possible that parties invest in these new technology pathways? How to support the build-up of new platforms, such as (the list below is not complete):

- Biomass2Syngas-2-X
- Fermentation (including digestion) of lignocellulosic containing feedstocks-2-X,
- Biomass 2 Pyrolysis-2-X and other pathways such as HTL-2-X
- And as much as possible combined as a point source of $CO_2$ with power-2-X-technologies (plus the synergetic integrations between options, i.e. the enhanced fuel pathways of e/biofuels)

These platforms can convert new types of biomass feedstocks base, such as the agri-residues, combined with renewable electricity, both sourced in Europe, to fuels and useful molecules.

This could mean that the current sub-mandates could be clearly designed to support above mentioned new technologies. This would broaden the portfolio of options. This provides a clear message to the market and directs investments.

We notice that parties in the hard-to-abate sectors such as maritime and aviation would rather see a prioritisation in the instead of assigning these sub-mandates equally for road, aviation and maritime. This would help ensure that scarce renewable and low-carbon fuels support sectors with limited decarbonisation alternative, but with high GHG reduction potential. However, from a producer or investor point of view demand that can be aggregated by the various sectors, instead of the currently 'silo'-ed approach, would best support the market uptake of these new technology pathways.

Furthermore, we propose to connect these sub-mandates to 'demand creation' of future uses such as feedstocks for the chemical manufacturing sector and/or Carbon Removal demand. This requires introducing mandates to shape these other demand markets: mandates for green chemical manufactured products (e.g. plastics) and mandates for carbon removals.

## 2.2 Link mandates to the development of a European production base

In the transport sector, the mandates are posed on the suppliers (or indirectly on the supplier). In the market logic the suppliers are optimising their price position with imports of cheaper biofuels from overseas. In this way, the European transport mandates fund the build-up of green production capacity overseas and prevent building a European production base.

Considering the changed geopolitical situation: we propose to connect the transport mandates (road, aviation and maritime) to the necessary build-up of a European green production base for above mentioned new pathways.

In this way the transport mandates support new industry clusters around new technology platforms, such as syngas-2-X integrated with power-2-X for many demands (alternative for green methane, green feedstocks for chemistries). In the current set-up (at least the case in the Netherlands) we let consumers pay a green premium to import biofuels and in that way this money is used to build up green production capacity overseas, whilst it could contribute to build new economic perspectives in Europa. Paying a premium while at the same time contributing to European based production capacity of renewable fuels (thus increasing strategic autonomy) and to strengthening European economic perspectives is politically a proposition that could receive support.

This could imply that we use the mandates to more specifically build up a European production base. In that way there is a clear connection that the transport mandates help building up new and broader European green production industry for various markets beyond transport fuels only.  This is also essential with respect to guaranteeing access to fuels for the military. Controlling production is a strategic capability. This same principle should be applied to European mandates for green chemical production. (or at least connected to the proposed start with lead markets)

# 3 Recommendations

Platform Renewable Fuels have a set of recommendations for the post 2030 framework or even sooner.

We propose a much stronger connection between the transport mandates, the context shaped by the ETS, to a European production base.

Much stronger connection with industry production for the chemical sector. The fuel and chemical manufacturing share (to a large extent) feedstock and technology base. Integrated production reduces costs, by valorisation of the many (by)products.

We recommend changing the European strategic stock obligation[1] from keeping stocks of crude oil to keeping stocks of fuels with a growing sub-mandate for keeping stock of renewable fuels.

## Higher transport mandates across all transport modalities

## Higher mandates in RED 4

- Exclude the use of renewable electricity (one instrument, one purpose) in the RED mandates for renewable fuels
- Support additional fuels to the market with a differentiated tax tariff between fossil and renewable (see support for the revised energy tax directive below)
- Set sub-targets more specifically on new technology pathways.
- Keep realised volumes for conventional and annex IX B (with diminishing volumes due to electrification the realised volumes should be kept through setting the target accordingly in the mandates)

## Higher mandates FuelEU Maritime

- Including all vessels (expanding scope to all vessels below the 5,000 gross tonnage)
    - These are often vessels that do not operate in international trade lanes and where the new energy carrier production and engine development can be much better connected with this scope.
- Targets in mandates increase yearly (and not in blocks of 5 years as currently the case)
- Exlude fossil LNG as an option to comply.

## Higher mandates ReFuelEU Aviation

- Include smaller airports and aircrafts in the regulation, otherwise there are no instruments for these smaller parties to change the energy carriers.
- Increase targets in mandates on an annual basis, as replacement to the current systems of 5-year-steps

## Sustainability certification and auditing

The current sustainability certification is based on administrative verification. Information on individual batches is largely only transmitted between direct trade partners in a supply chain. We propose to consider establishing physical tracing and digital instruments to create more transparency in supply chains. This could improve trust and can substantially reduce transaction costs. This in turn could make public oversight and private audit tasks quicker, simpler and more effective.

The use of solutions like the digital product passport, correlated to Digital Trade Events and business wallet can increase traceability and provide a better information position for physical traceability along the supply chain. Changing the way of recording (sustainability) information from the current paper trail to a digital form, making use of verifiable credentials will ensure that the data is secure, tamper-proof, and can be shared selectively. This is turn increases trust in the information and can be traced back to a legal entity.

The implementation of Digital Trade Events, aligns with the UNTP transparency protocol for supply chain actions on facility and individual batch level and could improve trust and substantially and reduce transaction costs[2].

[1] Directive 2009/119/EC

[2] For more information unpublished report on Clean Fuel Protocol developed fort he Dutch market. And case study for POME-biofuels: https://www.hernieuwbarebrandstoffen.nl/post/phb-report-digital-transparency-in-pome-biofuel-supply-chains

## Differentiation between fossil and renewable fuels[3]

Tariff differentiation could substantially improve the price position of renewable fuels compared to the fossil alternatives. In this regard, we endorse the proposed revision of the Energy Tax Directive and it would be good for European consumers that this tax differentiation can become effective as soon as possible. This helps to move away from fossil fuels to renewable fuels as the fuel of choice.

## Keep the long-term perspective with the proposed reductions paths in the emission trading systems (ETS 1 and ETS 2)

At first, the Emissions Trading Systems (ETS 1 and ETS 2) should keep up the current set-up of Cap and Trade and should keep their ambitious reductions pathways respectively in ETS 1 and ETS 2. These trading systems create the long-term investment security that the market needs and can be seen as an indispensable instrument for the necessary investments in ramping up green productions.

Apart from the emission trading systems, which focus on allowances for fossil emissions in the energy system, also a complementary instrument for transitioning away from (virgin) fossil crude oil in products/materials will need to be considered.

## Keep ambitious targets in the $CO_2$-performance standard

The CO2-performance standard for cars and vans and heavy duty should be kept at ambitious levels. Recent advancements of electrification of road transport have delivered strong decarbonisation achievements across Europe. While we believe electrification is the long-term solution across all landside transportation, for some specific use-cases of heavy-duty transport, electrification can remain a challenge, why low-carbon fuels remains a relevant option for the sector.

## Store the energy of surplus renewable electricity in molecules, which can generate decentral back-up electricity for the European electric mobility charging infrastructure

Align decentral renewable fuel production with the need to control access to renewable electricity in the development of the European charging infrastructure. Renewable fuel production pathways, for simultaneous production of Biomass-2-X and Power-2-X can together store surplus renewable electricity and produce fuels. Examples of this have been developed throughout Europe. Aligning fuel production and support of the electricity grid has the potential to accelerate the electrification of road transport. At the same time this decentral production facilities can provide in e-SAF volumes. This will result in higher energy system efficiency and could be supported by a specific fiscal instrument, or with differentiation in tax tariffs like proposed in the revision of the ETD.

## Support biomass mobilisation

Platform Renewable Fuels gives in consideration to think about ways how to support the mobilisation of residues in the agricultural sector and/or intermediate crops for the green production industry in Europe and overseas. Biofeedstock is available but more decentral in nature. This requires scaling by numbers, and innovations that support social inclusion in biohub development[4]. Subsidies for capacity building (also for smallholders), access to finance (also for smallholders), joint investments in new equipment and capacities for intermediate organisations such as farmer organisations are very helpful support instruments.

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[3] See our analysis about how to improve the price position of renewable fuels https://www.hernieuwbarebrandstoffen.nl/event/how-to-improve-the-price-position-of-renewable-fuels

[4] https://www.cleanshipping.nl