

Letter to Renewable Energy Directive negotiators on Carbon Capture Utilisation fuels

Dear Negotiators,

We are writing to you to provide input to the ongoing trilogue negotiations around the future of the Renewable Energy Directive. We are concerned by the inclusion of a wide variety of Carbon Capture and Utilisation (CCU) fuels and are seeking robust environmental safeguards to protect the integrity of the EU's climate and energy policy framework. The RED is intended to accelerate renewables growth and act to reduce emissions. As currently drafted the inclusion of CCU fuels risks undermining both these aims.

Across the different institutions' positions on the Renewable Energy Directive, we see at least 5 categories of CCU fuels: Renewable Fuels of Non-Biological Origin (RFNBOs, also known as electrofuels); Bacteria Based Fuels; Biofuels (when produced from or by bacteria); Waste Based Fossil Fuels; and, Recycled Carbon Fuels (equivalent to Waste Based Fossil Fuels).

Under current proposals, a CCU fuel could potentially qualify as 'renewable' under more than one of the above classifications, with different environmental criteria applying. This risks creating confusion amongst investors and other stakeholders, undermining public trust in our regulatory framework for climate change and energy.

We strongly support the European Parliament's position on requiring RFNBOs to use CO₂ captured from the air as the carbon-based feedstock.

This amendment will help to protect the integrity of the EU Emissions Trading System by preventing 'leakage' of emissions from industrial sectors (under the ETS cap) to the transport sector. We recommend that negotiators agree to adopt the European Parliament's position on this matter.

Under current proposals, the Renewable Energy Directive will fail to ensure additionality in terms of renewable electricity technologies installed to provide the energy input to electrofuel production. Without additional measures, we see a real risk that the renewable energy content of electrofuels will in effect be double-counted, undermining any potential environmental benefit of the fuels and reducing the ambition of the overall renewable target. We recommend that this issue is investigated further by the European Commission and appropriate measures are included into the final package.

We are also concerned about the proposed inclusion of Waste-Based and Recycled Carbon Fuels, and therefore believe that, as a minimum, **robust standards for greenhouse gas emissions savings (at least 70%) should be required.** In addition, we believe that solid waste stream should not be considered within the scope of the Directive.

Irrespective of the type of CCU fuel, a full life cycle assessment should be a pre-requisite for any project seeking access to public funding, taking into account both the CO₂ source and energy inputs, on a cradle-to-grave basis.

Yours sincerely,ⁱ



ⁱRelevant briefings on CCU fuels:

Agora Energiewende. 2018. [Die zukünftigen Kosten strombasierter synthetischer Brennstoffe.](#)

Bellona. 2017. [The Power to Liquids trap.](#)

ICCT. 2017. [CO₂ based synthetic fuels: Assessment of potential European capacity and environmental performance.](#)

Transport&Environment. 2017. [Electrofuels briefing.](#)