













Public consultation on reducing CO2 emissions from road vehicles

ePURE contribution - additional statement

ePURE, representing the European Renewable Ethanol industry, welcomes the present and future initiatives undertaken and prepared by the European Commission to reduce CO2 emissions from road vehicles. We believe that tackling greenhouse gas (GHG) emissions from the transport sector is crucial with a view to achieving the envisaged climate and energy targets.

ePURE generally holds the view that every industry sector shall contribute its fair share to achieving the overall GHG emission reduction targets set for 2020 and beyond. This principle is also at the core of the climate and energy package that has been adopted in 2009. Emission standards for road vehicles are a genuine part of this package and should be maintained up to 2020 and also beyond in order to stand a fair chance of curbing GHG emissions from transport. One major omission in the current legislation is however, that no support is given to constructors of Flex-Fuel-Vehicles (FFV), which could contribute significantly to achieving the emission standards. We believe that this needs to be amended in order to incentivize the production of more environmental friendly cars.

Furthermore we believe that mandatory greenhouse gas emission standards must be an integral part of a set of regulatory action aiming at reducing greenhouse gas emissions from transport. This set of legislation should encompass at least the following elements:

- 1. The contribution of fuels need to be assessed using a <u>life cycle analysis</u> for all fuels and energy carriers not just biofuels. Looking at tailpipe emissions alone will not depict the overall greenhouse gas emission reduction potential in an objective manner.
- 2. The fuel specifications and vehicle technologies need to be in place in order to ensure the delivery of minimum obligatory targets. As fuel ethanol has a significant role to play in achieving emission standards of road vehicles, higher incorporation rates of ethanol in petrol should be allowed by amending the <u>Fuel Quality Directive</u>.
- 3. The <u>Energy Taxation Directive</u> should be amended with a view to solving the paradox of clean renewable fuels being taxed at a higher rate than polluting fossil fuels.