



Public consultation on accounting methods and conditions for the 10% renewable energy in transport target – and on the need for additional types of biofuels being listed in Annex III of the Renewable Energy Directive

ePURE contribution

ePURE, representing the European Renewable Ethanol industry, welcomes the opportunity to express its views on the presented consultation document. We consider the Renewable Energy Directive (28/2009) to be the key to a sustainable transport sector while guaranteeing even greater and yet affordable mobility for the citizens of the EU. ePURE holds the view that all forms of renewable energy in transport are equally important for the future low carbon energy mix. A robust and nondiscriminatory accounting method for the target achievement is indispensable to create a level-playing field.

Section A: Electricity from renewable sources in transport

Question 2: Given that electricity is generated from both renewable as well as non-renewable sources, under what condition do you think it would be justified to count the whole amount of electricity in electric vehicles as renewable?

ePURE is of the opinion that all renewable energy sources are to be treated the same way in terms of its contribution towards fulfilling the 10% target. The accounting method for the contribution of renewable electricity must therefore be sound and in line with the one for biofuels. We do not see any reasonable justification for discriminating against the internal combustion engine. Accepting all electricity consumed by electric vehicles to count towards the 10% target would be equal to accounting all petrol used in Flex-Fuel-Vehicles (FFVs) as counting towards the renewable energy target, regardless of whether it is fossil or biomass based.

In order to level the playing field between the different renewable energy options usable in transport, the environmental performance of renewable electricity supplied by the grid and consumed by electric vehicles must be measured in consistence with the sustainability criteria put in place for biofuels. A consequential life cycle assessment, as has been applied by the European Commission in calculating the greenhouse gas intensity of biofuels, needs to be applied to electricity as well.

Section B: Hydrogen from renewable sources in transport

Question 1: Which are in your view the most likely ways to produce hydrogen from renewable sources (partly or fully) by 2020?

None are likely to be significant by 2020, it seems that biomass gasification could be the most reasonable from a cost point of view, although competing applications present higher efficiencies.



Section B, question 2: For each option you selected, if it would be used for transport, how would you suggest to calculate its contribution to the 10% target for renewable energy in transport?

The hydrogen from renewable sources must be subject to the same sustainability and accountability conditions than biofuels, so a mass balance system from the source to the final use and same contribution reporting system than the countries are developing for biofuel have to be used for hydrogen and any other renewable option for the transport sector.

Section C: Biomethane via the natural gas grid in transport

Question 2: Given that methane in the gas grid originates mostly from non-renewable sources (natural gas), under what condition do you think it would be justified to count the whole amount of methane extracted from the gas grid for the use in vehicles as renewable?

ePURE is of the opinion that all renewable energy sources are to be treated the same way in terms of its contribution towards fulfilling the 10% target. The accounting method for the contribution of biomethane must therefore be sound and in line with the one for liquid biofuels. Accepting all methane consumed by electric vehicles to count towards the 10% target would be equal to accounting all petrol used in FFVs as counting towards the RES-target, regardless of whether it is fossil or biomass based.

In order to level the playing field between the different renewable energy options usable in transport, the environmental performance of biomethane must be measured in consistence with the sustainability criteria put in place for biofuels. A consequential life cycle assessment, as has been applied by the European Commission in calculating the greenhouse gas intensity of biofuels, needs to be applied to biomethane as well.

Brussels, 14 June 2011
