



COMMUNICATION FROM THE COMMISSION

**"A sustainable future for transport:
Towards an integrated, technology-led
and user friendly system"**

Contribution to the public consultation
September 2009

1. Introduction

Last 17 June 2009, the European Commission adopted the Communication "*A sustainable future for transport: Towards an integrated, technology-led and user friendly system*", which aims at stimulating further debate to identify policy options in order to improve the sustainability of the transport sector.

All interested parties are encouraged to contribute to a consultation exercise before 30 September 2009, in order to express the views on the future of transport and to on how to translate the general objectives and priorities into concrete policy measures.

This paper gathers the contribution of *APPA Biocarburantes*, the Spanish Biofuels Association, which represents biofuel producers in Spain, including bioethanol biodiesel and biogas.

Additionally, it proposes a series of policy measures needed to improve the sustainability of transport by the use of biofuels.

2. Comments on the Communication

APPA Biocarburantes generally welcomes the exercise carried out by the Commission to open a debate on the sustainability of future transport.

However, due to the amplitude of the issue it considers that there are some aspects, related to biofuels and other alternative fuels that have not been sufficiently addressed and need to be explicitly cited:

- In paragraph 18 the Commission states that a "*binding target of 10% share of renewable energy sources in transport by 2020 has been adopted as part of the Climate and Energy package*", as "*transport did not reduce significantly its GHG intensity...*".

Although this measure will certainly involve a greater consumption of renewable energy, especially biofuels, it is also true that setting targets, exclusively, does not promote adequately these kinds of renewable sources, as it has been observed in the last two years: setting only targets has derived in a dramatic flow of biofuels coming from third countries, such as the United States, Argentina and Malaysia for biodiesel and Brazil for bioethanol.

Given this, in this paragraph the paper should mention that additional measures have to be approved at Community level to encourage autochthonous biofuel production.

- The Commission acknowledges that, additionally to GHG emissions, PM₁₀ are, in particular, the most important environmental problem of transport, as transport is the second most important source (NO_x and SO_x emissions are also mentioned but just exclusively from shipping).

In this frame, the paper should mention that alternative energy sources such as biofuels, electricity and natural gas for road transport, additionally with other

measures focused on reducing transport demand, can play a major paper as there is a great scientific consensus that these measures reduce particulate matter compared to current fossil fuel sources.

In the case of biofuels, adjusting the injection period could also reduce NOx emissions without penalising the PM reduction level.

- The Commission stresses the need to establish supporting infrastructures to alternative energy sources in order to substitute the current conventional sources, which if nothing is done, will be replaced by more polluting supplies (tar sands, etc).

Although we agree that for some alternative energy sources, such as electricity and hydrogen, there is a huge need of investment, the Commission fails to acknowledge that biofuels are already capable of being distributed in the current infrastructures thus saving lots of money. This tremendous benefit of biofuels should be explicitly highlighted in the text in order to give an appropriate analysis of the problem and the solutions.

3. Policy measure proposals to improve the sustainability of transport

The European Commission has set targets to increase the consumption of renewable sources in transport. However, it should set additional measures to promote not only the biofuel consumption but also the biofuel production within Europe.

These measures could be based in, always in agreement with the World Trade Organization rules, not permitting the entrance to EU territory of biofuels which in their origin countries have benefited of a direct or indirect subsidy, as it is currently occurring in Argentina, or adjusting the playing field so the biofuel from a third country does not benefit from tariff suspensions or reductions.

Furthermore, the European Commission should mandate CEN to prioritise the standardization of biofuels blends, such as high biodiesel-diesel blends (up to 30%) and bioethanol-diesel blends (E-diesel), which CEN has considered non-priority actions, thus resulting in a barrier to their development.

Additionally, there are positive experiences in Scandinavian countries, which have permitted an increase in biofuels consumption that should be fostered by the Commission at a European level, in order to allow a greater consumption of renewable energies in transport. Examples of these measures are:

- a) Promoting the production of and R&D in multi-fuel cars that can work alternatively with liquid biofuels, biogas and electricity (besides current fossil fuels). This measure will definitively allow the integration of different renewable energy sources, which as a result will increase the energy independence from polluting energy sources.



- b) Total or partially exempting multi-fuel cars, flexi-fuel vehicles (FFV), cars adapted to use high biodiesel blends and electric and hydrogen cars (i.e. green cars) of paying highway tolls.
- c) Total or partially exempting green cars of paying parking taxes in cities.
- d) Introducing a mandatory target for the consumption of biofuels or other renewable energy sources in public fleets, buses, taxis and garbage trucks.
- e) Mandating national, regional and local administrations to purchase a certain percentage of green cars.
- f) Providing fiscal benefits to private fleets that consume biofuels or other renewable sources.
- g) Introducing a mandate for service stations with fuel sales higher than a certain quantity of m³ to sell at least one type of renewable fuel. This measure has been adopted for several years in Sweden and currently there are more than 1200 service stations selling E85.