

Ms Kadri Simson  
European Commissioner for Energy  
European Commission

Ms Ditte Juul-Jørgensen  
Director-General of DG Energy  
European Commission

**Brussels, 26<sup>th</sup> October 2022**

Dear Commissioner Simson,  
Dear Director General Juul-Jørgensen,

**FuelsEurope call for the publication of a number of significant Delegated Acts**

FuelsEurope, the Association representing the European Fuel Suppliers, strongly supports the EU objective of net climate neutrality in 2050 and the circular economy, and stands ready to support policy makers to reach such goals.

**The Renewable Energy Directive (2018/2011 EU)** - currently under revision - **entered into force in December 2018** and mandated the **European Commission** to publish a number of delegated acts to set the rules for a number of important topics. These are critical for our Members in terms of committing significant investment and resources to support the transformation of our industry and meet the ambitious "Fit for 55" targets.

Firstly, we call for the delayed **Delegated Act for the revision and addition to Annex IX** feedstocks, and would appreciate an update on its planned publication. Article 28 of the Directive asked the Commission to review the list of feedstocks set out in Parts A and B of Annex IX by 25 June 2019, and every two years thereafter.

This delay is causing significant uncertainty with investors who need clarity to develop long term business cases and contribute to the transport decarbonization targets. Moreover, Annex IX has gained an ever-increasing importance after the publication of the "Fit for 55" package, where clear references to advanced feedstocks are made in the proposed regulations on ReFuelEU Aviation and FuelEU Maritime.

Secondly, we call for a **prompt publication of the outstanding Delegated Acts** with consideration of our proposals for inclusion during the public consultation process to reduce complexity and increase flexibility to encourage early long-term investment, and therefore to draft the texts in such a way that avoids ambiguity and multiple interpretation.

Namely:

- 1) Detailed Rules for the production of renewable liquid and gaseous transport fuels of non-biological origin.
- 2) Methodology for assessing greenhouse gas emissions savings from renewable liquid and gaseous transport fuels of non-biological origin and from recycled carbon fuels.
- 3) Methodology to determine the share of biofuel and biogas for transport, produced from biomass being processed with fossil fuels in a common process.

We stand ready to contribute to the work of the European Commission and remain open to a constructive dialogue.

Yours Sincerely,



John Cooper  
Director General