

Cc to all the Permanente Representations attachés of Transports, Energy and Industry
Rapporteur and shadows of the European Parliament,
Office of the Commissioner of Energy, Mrs Simson and DG GROW and DG ENER

Brussels, Belgium
October 3rd, 2023

Subject: The Net Zero Industry Act shall define the Sustainable Alternative Fuels technologies as “Strategic Net Zero Technology”

The co-signatories would like to convey the industry’s recommendation to ensure a consistent definition of *Sustainable Alternative Fuels* in the Net Zero Industry Act.

This definition needs to achieve two goals:

- 1) Align with other pieces of the EU policy framework on transport and fuels; and,
- 2) Ensure that all sustainable fuel technologies are adequately recognized order to decarbonise transport, encouraging innovation and the transition to renewable and low-carbon solutions in the industrial sector.

Driven by EU policies, demand for *Sustainable Alternative Fuels* will rapidly rise in years to come, and – in the absence of a suitable domestic production capacity - supply shortages would force the EU to rely on foreign production. To ensure its energy security and independence, the Union must actively support the large-scale deployment of sustainable alternative fuels technologies and the development of resilient supply chains.

Therefore, the industry calls the policy makers to:

- **Ensure consistency with EU legislation and provide certainty to investors, by aligning the definition of *Sustainable Alternative Fuels* to all fuels defined as sustainable by the Renewable Energy Directive (EU) 2018/2001 and to the low carbon fuels to be determined by the upcoming revised Hydrogen and Gas Market Directive and do not limit their definition to ReFuel EU Aviation and FuelEU Maritime¹;**
- **Include an explicit reference to *Sustainable Alternative Fuels technologies* in the list of strategic net-zero technologies** to acknowledge their role in supporting and accelerating the transition of the transport and industry sectors.

¹ Fuels production typically yields a range of different products and, for example, producing Sustainable Alternative Fuels will result in production of renewable and low-carbon fuels for road transport and chemical products. Including these fuels is key to leverage the benefits and synergies with other transportation sectors, allowing to exploit the full potential of these technologies for a net-zero transport future.

The explicit and clear inclusion of *Sustainable Alternative Fuels* as a strategic technology for the European Union under the Article 3 of the Net Zero Industry Act would send a clear signal to the industry players, investors and innovators; encouraging them to focus their efforts on the development and adoption of these environmentally friendly solutions.

We thank you for your attention, your support and remain available, if necessary.

Signatories: CEWEP, eFuel Alliance, Eurogas, ESWET, Fertilizers Europe, FuelsEurope, and Methanol Institute.



CEWEP (Confederation of European Waste-to-Energy Plants) is the umbrella association of the operators of Waste-to-Energy plants across Europe. CEWEP's members are committed to ensuring high environmental standards, achieving low emissions and maintaining state of the art energy production from remaining waste that cannot be recycled in a sustainable way.



eFuel Alliance is an interest group that advocates for a positive policy framework for the use and production of eFuels from renewable energies. We aim to win broader recognition of the significant contribution eFuels can make in the drive for sustainability and climate protection. Our goal is to facilitate the industrial production and wide- spread use of carbon neutral synthetic liquid fuels from renewable energy sources.



Eurogas and its members work together to produce information material, respond to consultations, provide input to studies, analyze the impact of EU political and legislative initiatives, and communicate their findings to EU stakeholders, including suggesting improvements. An established structure of expertise, consisting of committees and working groups, ensures that our views are defined and endorsed by seasoned experts in the energy field.



EUROPEAN SUPPLIERS OF WASTE-TO-ENERGY TECHNOLOGY

ESWET – the European Suppliers of Waste to Energy Technology – represents companies that build and supply over 95% of the Waste-to-Energy plants in operation in Europe. Technology from the ESWET members is the heart of most of the Waste-to-Energy plants in Europe and worldwide, allowing the recovering of energy and materials from non-recyclable waste which would otherwise be landfilled. The purpose of ESWET is to raise awareness of the positive implications of Waste-to-Energy in terms of sustainable, waste management, clean and reliable energy, and protection of the environment.



**Fertilizers
Europe**

Fertilizers Europe represents the interests of the majority of mineral fertilizer manufacturers in the European Union. The association's membership comprises 16 fertilizer manufacturers from countries across the Union and 9 national fertilizer associations. The association communicates with a wide variety of stakeholders, institutions, European and national policy-makers and members of the general public who seek information on fertilizer products and application technology, and topics relating to today's agricultural, environmental and economic challenges.



FUELLING EUROPE'S FUTURE

FuelsEurope represents the EU fuels & industrial value chains products manufacturing industry in the policy debate with EU Institutions and other stakeholders, providing an expert opinion on the production process, distribution and use of our industry's products, in order to contribute to a regulatory framework that: Promotes EU excellence in technologies contributing to the energy transition towards society's climate goal; Boosts sustainable development through supporting a competitive EU industry; Establishes effective, technically feasible and sustainable requirements to protect human health and the environment.



Methanol Institute was founded in 1989, the Methanol Institute (MI) serves as the global trade association for the methanol industry representing the world's leading methanol producers, distributors and technology companies, the mission of the Methanol Institute (MI) is to serve and provide cost-effective value to its membership from our offices in Singapore, Washington, D.C., Brussels, Beijing and Delhi. As the voice of the global methanol industry, the Methanol Institute works to protect existing markets for methanol while promoting the growth of emerging energy markets.