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Statement 25.11.2020
EU CO2 emission standards for cars and vans

The EU legislation on the CO2 emission standards for cars and vans shall be technology neutral and in the emission calculations all emissions through the lifetime of the car and the fuel has to be taken into account. Instead of the tail pipe emission values (tank-to-wheel, TTW) the well-to-wheel (WTW) emissions should be considered meaning that also the emissions from the production phase of the fuel to the use of the energy in the car are taken into account. This is the only way the alternative fuels, such as bio-CNG and other sustainably produced biofuels, hydrogen and e-fuels can be treated in a fair way.

If no other way of treating all kinds of cars and all energy sources equally can be found the cars run by sustainably produced alternative fuels like bio-CNG must be classified as such as very low emission or zero emission vehicles.

The current standards take into account only the tail pipe emissions defined by the WLTP tests. Due to the fact that the PHEV cars get very low emission values in the WLTP tests the EU emission standards now encourage the car makers specially to produce PHEV cars and vans in addition to the EV's. It is questionable if the increase in the number of PHEV's leads to the targeted emission reductions in reality. At least in some European countries the average emissions of new cars and vans have already started to grow again because the cars get bigger and heavier although big part of them are PHEV's.

We also strongly support the proposal for the crediting system for renewable fuels in EU emission standards for road transport made by Frontier Economics for the German Federal Ministry for Economic Affairs and Energy (BMWi). https://www.frontier-economics.com/media/3937/crediting-systems-for-renewable-fuels-in-eu-emission-standards-for-road-transport-en.pdf

The EU legislation (REDII) orders the fuel suppliers to supply a minimum of 14% of the energy consumed in road and rail transport by 2030 as renewable energy. In Finland also Bio-CNG will be included as one of the renewable fuels in this calculation. (At the same time in Finland the required percentage of renewable fuels will be much higher than 14 %.) We suggest that the same should applied all over the EU.

Switzerland is a good example of a fair way of assessing CO2 emissions of renewable fuels. Switzerland will consider the "net" CO2 emissions of vehicles that are fueled with renewable fuels. In detail, emission levels will be calculated according to the share of biomethane in the gas mixture certified by authorities.

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We as the users of bio-CNG as the transport fuel would like to emphasize the excellent features of it:

1. Bio-CNG has proved to be a sustainable fuel since the CO2 emission reduction is 80-90 % compared to fossil petrol and diesel. Even fossil CNG reduces the CO2 emissions 25-30 %.

2. Bio-CNG is an existing fuel that can be used in normal cars and vans today. For instance today in Europe 17 % of the CNG used in transport is bio-CNG meaning that in reality the emissions caused by the CNG vehicles is much less than the pure WLTP values show. The proportion of bio-CNG is growing and is already in Sweden near 100 % and in many European countries clearly over 50 %, for instance in Finland. At the same time the number of CNG cars is especially growing in the countries where the use of bio-CNG is big and growing.

3. It is cheap and easy to (start to) produce cars and vans that can run on bio-CNG in the existing car factories.

4. The pipelines and transport fuel distribution stations built for natural gas throughout Europe are as such available also for Bio-CNG.

5. Producing Bio-CNG offers an important step towards a circular economy, production of Bio-CNG can reduce also the emissions from agricultureand create employment in Europe.

Sincerely regards

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Kaasuautoilijat ry is an independent non-governmental association representing CNG/CBG motorists in Finland. It is also supported by some biomethane producers and biomethane technology companies.