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to the Commission
Rule 144
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Subject: Biofuels and e-fuels in road transport

The possibility of expanding the role of sustainable renewable fuels raises serious concerns regarding climate integrity, resource efficiency and investment certainty.

Direct electrification remains the most efficient decarbonisation pathway for road transport.

A million hectares of photovoltaic panels could power 400 million electric vehicles (EVs) compared with the 32 million hectares currently used for biofuel production to fuel 130 million combustion engine vehicles. Europe's 8 million EVs have already cut oil imports by 48 million barrels.

Alternative fuels are not cost-competitive: hydrotreated vegetable oil costs approximately 79 % more per 100 km than charging an EV; e-fuels are projected to reach EUR 7 per litre by 2030.

Recent analysis shows that a biofuel loophole in the Car CO_2 Regulation would raise total EU demand to between two and nine times the sustainably available supply, putting it in direct competition with the aviation and maritime sectors, where no mature alternatives exist.

The current EU biofuel mix delivers only 20–40% life cycle CO_2 savings, and certification fraud, including mislabelling of virgin palm oil as waste-based feedstock, risks erasing even those gains.

Finally, unlike EVs, combustion engines emit local air pollutants which, according to the European Environment Agency, cause hundreds of thousands of premature deaths each year in the EU.

How does the Commission assess the climate, social and industrial risks of slowing direct electrification in order to accommodate alternatives that are insufficient, unscalable, more expensive and more polluting?

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