

Contribution to the public consultation on the revised Climate, Energy and Environmental Aid Guidelines (CEEAG)

According to the draft communication of the Commission, aid measures that incentivise new investments in natural gas-fuelled (including CNG and LNG) transport vehicles may unduly distort competition where it displaces investments into cleaner alternatives that are already available on the market, or where it locks in certain technologies, hampering the wider development of a market for and the use of cleaner technologies.

- In response to these statements, ANFIA recommend to consider also that restricting aid to only a limited set of options, the so-called “zero emissions” solutions (electric and hydrogen), would likewise unduly distort competition. The European legislative framework should be respectful of the technological neutrality principle and should not indirectly lead to the ban from the market of any particular technology: all technologies should be allowed to contribute to the decarbonization of road transport since zero emission vehicles will take years to be fully accepted by users.

The draft document under consultation also refers to a negative long-term impact of natural-gas fuelled vehicles.

- ANFIA recommend to take into proper consideration the benefits in reducing CO₂ emissions enabled by renewable and zero-and-low-carbon fuels, since they represent a ready solution on the market that can be applied to all existing vehicle technologies with immediate effect in reducing GHG emissions and benefits in terms of circular economy.
- CNG and LNG vehicles are fully compatible with renewable gas and enable a progressive transition of the transportation system, ensuring affordability and at the same time good environmental performance. **Currently, gas-based mobility operates with a share of more than 17% of biogas on European roads, already cutting GHG emission down to almost 40%** (compared with diesel on a well-to-well basis)¹. According to NGVA Europe’s estimations, with the proper policy incentives, this share could be raised to at least 40% of biogas by 2030, resulting in a -55% GHG emission reduction.

¹ <https://www.ngva.eu/medias/already-17-renewable-gas-used-by-the-mobility-sector-in-europe/>