

Ms Ursula von der Leyen, President of the European Commission  
Mr Frans Timmermans, Executive Vice-President and Commissioner of the European Commission – Climate Action  
Ms Kadri Simson, Commissioner of the European Commission - Energy  
Mr Thierry Breton, Commissioner of the European Commission – Internal Market  
Ms Adina Valean, Commissioner of the European Commission – Transport  
Mr Mauro Petriccione, Director General of the European Commission – Climate Action  
Ms Ditte Juul- Jørgensen, Director General of the European Commission – Energy  
Ms Kerstin Jorna, Director General of the European Commission – Internal Market  
Mr Henrik Hololei, Director General of the European Commission – Mobility and Transport

17 June 2021

**Subject: Open letter to the European Commission on the risk of failure to meet long-term climate protection goals in the transport sector due to insufficient legal regulations**

Dear President von der Leyen,  
Dear Executive Vice-President Timmermans,  
Dear Commissioner Simson,  
Dear Commissioner Breton,  
Dear Commissioner Valean,  
Dear Director General Petriccione,  
Dear Director General Juul- Jørgensen,  
Dear Director General Jorna,  
Dear Director General Hololei, Dear Sir or Madam,

We, the undersigned scientists, call on the European Commission to design the further development of legal regulations for climate protection in the transport sector in a way that is technology-neutral and primarily based on the criteria of sustainability and the real, physical reduction in greenhouse gas emissions (GHG). The undersigned are convinced that the planned changes in the legal regulations especially of the Energy Taxation Directive, the CO2 fleet regulation for passenger cars and heavy-duty vehicles as well as the Renewable Energy Directive inadequately address these points for setting essential and sustainable framework conditions for long-term climate protection. The currently proposed changes would lead to the EU missing its long-term climate targets, regardless of the temporary effects of the corona pandemic.

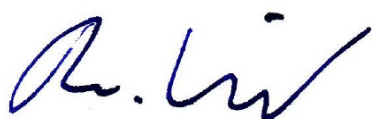
Our main requests are:

1. The expected real GHG reductions of the planned measures are to be disclosed, and set transparently under consideration of the remaining CO2 emissions budget of the EU in the context of the objective to limit global warming to 1.5-degrees C.
2. The potential of GHG reductions through sustainable alternative liquids and gaseous fuels is to be used without restriction.
3. All climate protection measures should be accounted for in the GHG reduction quota solely based on their real GHG reductions (i.e. no multiple counting; see point 4).
4. Multiple counting of individual measures or technologies on the GHG quota obligation is to be rejected.
5. Every climate protection measure must be subject to equally strict sustainability criteria that take into account ecological, social and health impacts across the entire global value chain, while being technology-neutral.
6. Against the background of the immense and ever-growing time-pressure in mitigating climate change, the following criteria for climate protection measures should be met:
  - a. They have to lead to real GHG reductions without delay.
  - b. They must not cause any export of GHG emissions or of carbon leakage across the entire global value chain and under consideration of sector couplings.
  - c. It must be possible to apply them globally and quickly.

We hope to enter into a professional discussion with you in order to explain the complex interrelationships and background for our demands, also on the basis of the relevant literature in the appendix.

Thank you for your consideration.

Yours Sincerely,



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The scientists named in this list sign the open letter as private individuals

## Appendix:

### Literature to substantiate and concretize our demands:

**DECHEMA/ProcessNet 2018:** Advanced alternative liquid fuels: For climate protection in the global raw materials change. Position paper of the ProcessNet Working Group „Alternative Liquid and Gaseous Fuels“.

[https://dechema.de/dechema\\_media/Downloads/Positionspapiere/2018\\_alternativeBrennstoffe\\_en.pdf](https://dechema.de/dechema_media/Downloads/Positionspapiere/2018_alternativeBrennstoffe_en.pdf)

**IPCC 2018:** Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emissions pathways in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

<https://www.de-ipcc.de/256.php>

**B. Buchspies, M. Kaltschmitt 2018:** A consequential assessment of changes in greenhouse gas emissions due to the introduction of wheat straw ethanol in the context of European legislation. Applied Energy 211 (2018) 368-381

<https://www.sciencedirect.com/science/article/abs/pii/S0306261917315477?via%3Dihub>

**Frontier Economics 2020:** Cradle-to-Grave Life-Cycle Assessment in the Mobility Sector. A Meta-Analysis of LCA Studies on Alternative Powertrain Technologies.

[https://www.fvv-net.de/fileadmin/user\\_upload/medien/pressemitteilungen/FVV\\_LCA\\_Life-cycle\\_analysis\\_Frontier\\_Economics\\_R595\\_final\\_2020-06\\_EN.pdf](https://www.fvv-net.de/fileadmin/user_upload/medien/pressemitteilungen/FVV_LCA_Life-cycle_analysis_Frontier_Economics_R595_final_2020-06_EN.pdf)

**T. Willner 2020:** Climate Protection in the Transport Sector – The Key Role of Alternative Fuels. In: J. Werner, N. Biethahn, R. Kolke, E. Sucky and W. Honekamp (Eds.): Mobility in a Globalised World 2019. University of Bamberg Press, ISBN 978-3-86309-731-8, Bamberg, May 2020, pp 261-289

[https://fis.uni-bamberg.de/bitstream/uniba/47670/3/fisba47670\\_A3a.pdf](https://fis.uni-bamberg.de/bitstream/uniba/47670/3/fisba47670_A3a.pdf)