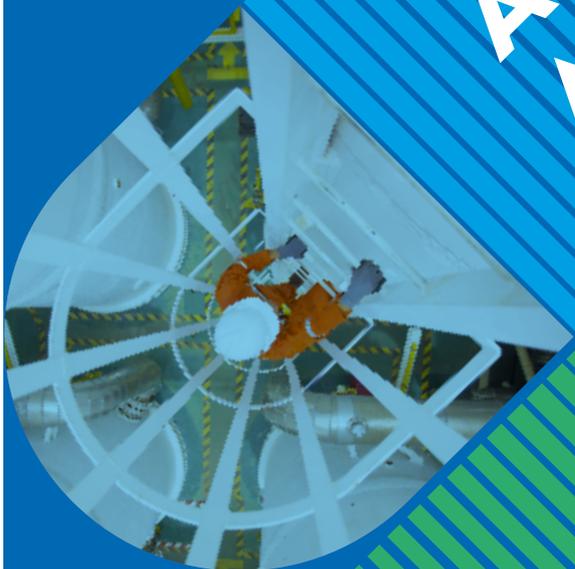


2021

UPEI  
ANNUAL  
REPORT

ACCELERATE  
AND ADAPT





**UPEI represents European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe’s customers, independently of the major oil companies and energy producers.**

**Independent suppliers, covering a third of Europe’s demand, play a crucial role in an evolving market by bringing competition which is vital to the economy. Their independence enables them to respond rapidly to changes in terms of market structure, products, and services, contributing to security of supply on a local, regional and national level while embracing new, cost-effective solutions which further promote energy efficiency and reduce pollutants and emissions.**

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# PRESIDENT'S FOREWORD



The year 2021 was one of acceleration and adaptation. As the world witnessed the unprecedented impact of the pandemic started in 2020, particularly the economic bottlenecks created by the sudden post COVID-19 recovery, the entire society had to adapt and face a massive surge in energy prices.

In parallel, while the climate crisis remained as acute as before the pandemic, the European Union (EU) really took on a role as a frontrunner in addressing climate change, with the presentation of its "Fit for 55" policy and legislative package on 14 July 2021. The Fit for 55 package is meant to shape the regulatory landscape for the upcoming decade and beyond, and has understandably dominated the policy agenda of the entire year, as its proposals address a wide range of policy areas, especially in the energy and transport sectors. The transition of the mobility sector had already started and, with the COVID 19 crisis, we all faced a unique opportunity to accelerate the transition to more sustainable energy and transport systems.

The ambition of reaching climate neutrality in road, aviation and maritime transport as well as in heating is clearly defined, but the path to 2050 remains challenging and requires making the right choices and decisions. We are convinced that speeding up measures to reduce greenhouse gas emissions and scaling up the offer of sustainable alternative fuels is the only way to make the Green Deal a success and to contribute to making our planet liveable. In this context, more than ever, making the voice of independent fuel suppliers heard is crucial. In 2021 UPEI contributed to the public consultation processes for many of the legislative initiatives proposed in the Fit for 55 package and published detailed position papers on the main legislative proposals, thus strengthening our position on key policy files and fostering the dialogue with the EU

institutions. We remain eager and committed to being an active part of the EU's climate ambition.

To prepare our papers and contributions and highlighting how the independent fuel suppliers can contribute, we have worked very closely with our members, our experts and our commissions all across Europe, with European sister and likely-minded organisations in the sector and with the EU institutions.

We were also able to count on the strong commitment of our President Brian Worrall, who greatly contributed to advancing our cause during his four years as President of UPEI, maintaining the direction through difficult conditions. He leaves the head of UPEI as a professional and growing association.

As we move through 2022 and face even more challenging times from environmental, economic, social and geopolitical perspectives, UPEI continues to request a clear and supportive policy framework that helps attracting investments in all sustainable energy sources and technologies.

UPEI will continue to engage with the co-legislators to refine and improve the policy measures supporting the deployment of sustainable fuels in all sectors, in order to effectively and cost-efficiently reach the 55% target by 2030 and achieve a carbon neutral economy by 2050.

2022 will mark our 60th anniversary, which we will celebrate on the occasion of our General Meeting in Dublin: as we did since 1962, we will continue to represent independent fuel suppliers in Europe, ensuring that they have a seat at every table where the key discussions take place, and accompanying them through their transition from fossil fuels to a diversified offer of a portfolio of sustainable fuels.



**As a result, 2021 will be remembered as a year where the climate policy ambition was accelerated and where independent fuels suppliers adapted to post-COVID 19 challenges, while moving firmly ahead through the transition to sustainable fuels.**



**Johan Deleu**

# ABOUT UPEI

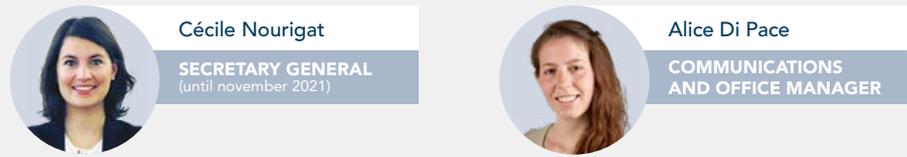


# STRUCTURE OF UPEI

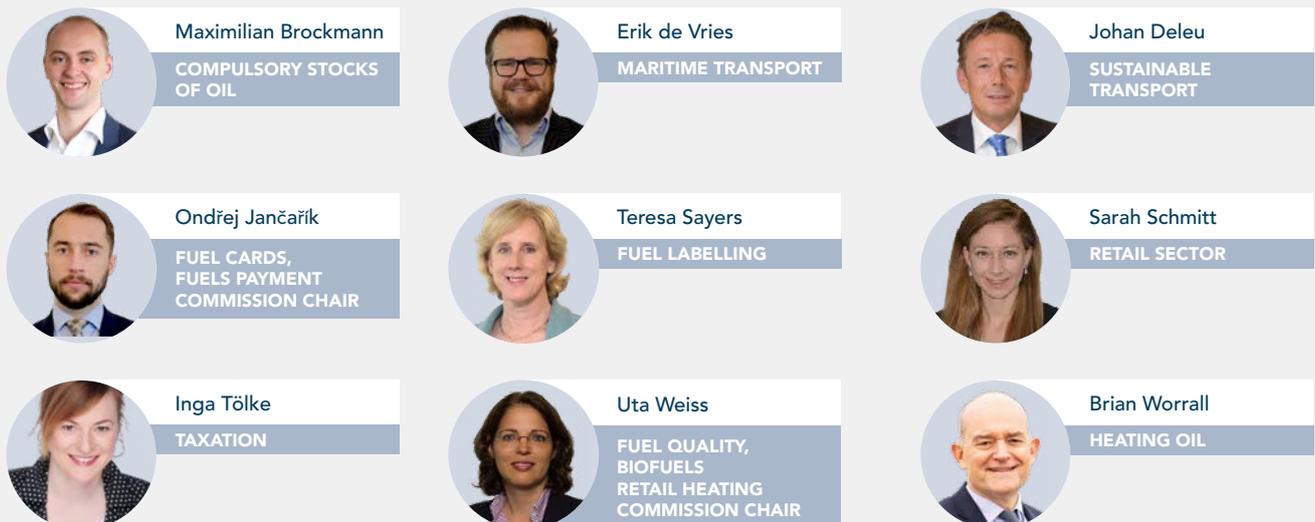
## UPEI PRESIDING BOARD



## UPEI SECRETARIAT



## UPEI EXPERTS



## UPEI HEADQUARTERS

Following the UPEI General Meeting's decision of 25 June 2020, the transfer of UPEI's Headquarters from Paris to Brussels and its establishment as an International Not for Profit Association (INPA) according to the Belgian Law, was officialised by Royal Decree on 4 November 2020 and published on the Belgian Official Journal "Moniteur Belge" of 6 January 2022.

# UPEI COMMISSIONS

UPEI covers a wide spectrum of downstream activities. In order to address all the topics and issues identified at the business level by the membership, as well as policy developments at EU level that affect the business, five Commissions were created – one for each of the main business activities of UPEI membership.

## BUNKERING COMMISSION



- Decarbonisation
- Fuel quality
- Sustainable fuels
- Taxation
- Emission Trading Scheme

**1**  
MEETINGS

## RETAIL HEATING COMMISSION



- Energy efficiency
- Building legislation
- Bio heating oil

**4**  
MEETINGS

## IMPORT / TRADING / WHOLESALE COMMISSION



- Biofuels
- Compulsory stocks obligation
- Energy taxation
- Fuel quality
- Emission Trading Scheme

**2**  
MEETINGS

## RETAIL STATIONS COMMISSION



- Alternative fuels infrastructure
- Fuel labelling, blends and additives
- Technical regulations for stations
- Trends in retail sector

**1**  
MEETINGS

## FUEL PAYMENTS COMMISSION

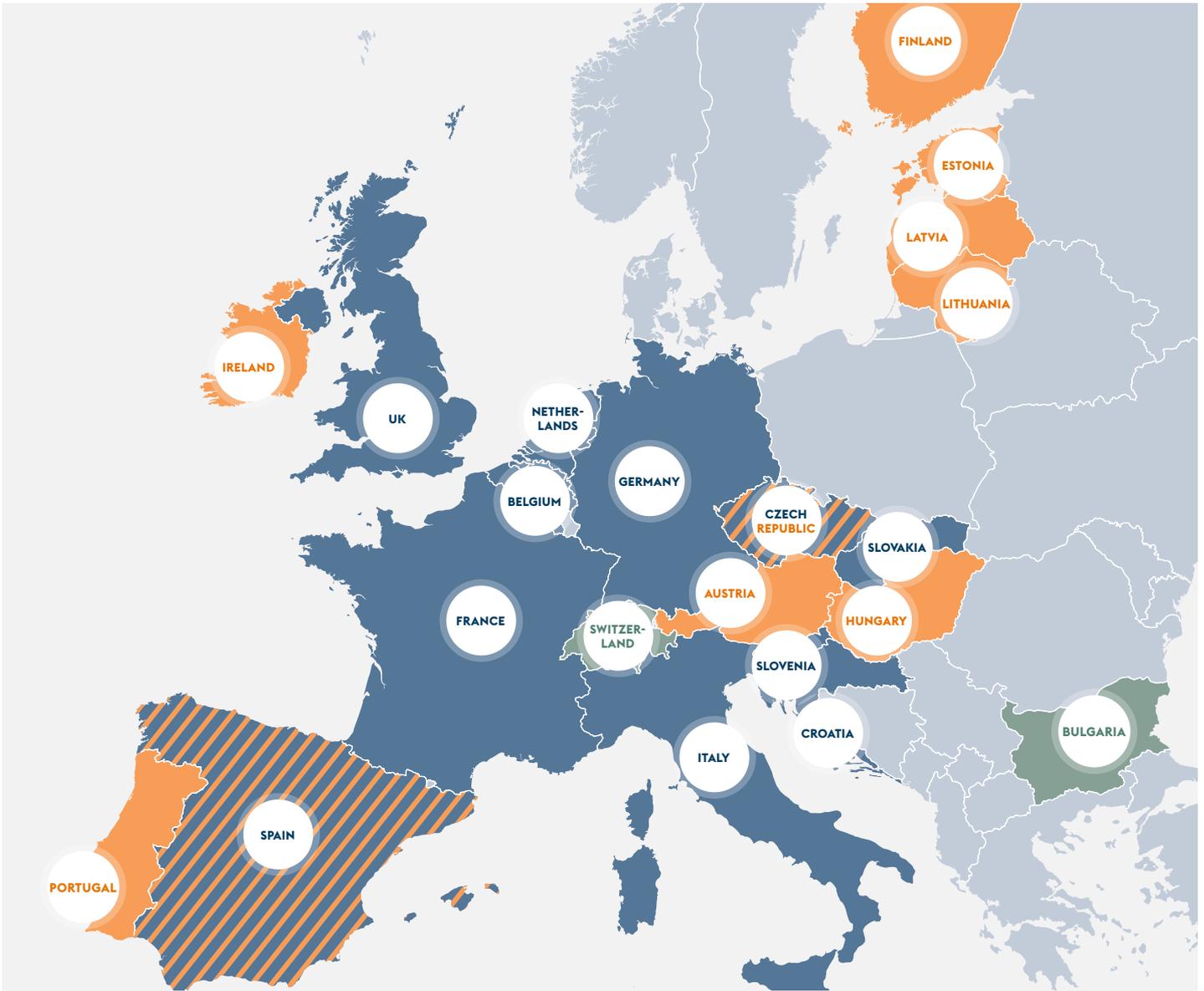


- Fuel cards and apps
- Payment services legislation
- Fraud
- Innovation
- Trends in the payment area

**2**  
MEETINGS

**= 10 commission meetings in 2021**





**NATIONAL ASSOCIATIONS**

**BELGIUM**

Brafco - [www.brafco.be](http://www.brafco.be)

**CROATIA**

HUP - [www.hup.hr](http://www.hup.hr)

**CZECH REPUBLIC**

SČS - [www.scs.cz](http://www.scs.cz)

**FRANCE**

FFPI - [www.ffpi.fr](http://www.ffpi.fr)

**GERMANY**

MEW - [www.mew-verband.de](http://www.mew-verband.de)

**ITALY**

ASSOPETROLI – ASSOENERGIA  
[www.assopetroli.it](http://www.assopetroli.it)

**THE NETHERLANDS**

NOVE - [www.nove.nl](http://www.nove.nl)

**SLOVAKIA**

SČSSR - [www.scssr.sk](http://www.scssr.sk)

**SLOVENIA**

SNNK-WPC - [www.snnk-wpc.si](http://www.snnk-wpc.si)

**SPAIN**

UPI - [www.petrolosindependientes.es](http://www.petrolosindependientes.es)

**UK**

DFA - [www.downstreamfuel.org.uk](http://www.downstreamfuel.org.uk)



**COMPANIES**

**AUSTRIA**

Stiglechner - [www.stiglechner.com](http://www.stiglechner.com)

**CZECH REPUBLIC**

W.A.G. Payment Solutions a.s.  
[www.eurowag.com](http://www.eurowag.com)

**ESTONIA**

Olerex AS - [www.olerex.ee](http://www.olerex.ee)

**FINLAND**

SEO - [www.seo.fi](http://www.seo.fi)

**HUNGARY**

Mabanaft Hungary Kft - [www.mabanaft.hu](http://www.mabanaft.hu)

**IRELAND**

DCC Energy Limited - [www.dcc.ie](http://www.dcc.ie)

**LATVIA**

AS VIRŠI-A - [www.virsia.lv](http://www.virsia.lv)

**LITHUANIA**

UAB Gelybye (Lithuania)  
[www.facebook.com/gelybye/](https://www.facebook.com/gelybye/)

**PORTUGAL**

PRIO Energy - [www.prio.pt/en/](http://www.prio.pt/en/)

**SPAIN**

OnTurtle - [www.onturtle.eu/en/](http://www.onturtle.eu/en/)  
Andamur - [www.andamur.com](http://www.andamur.com)



**ASSOCIATES**

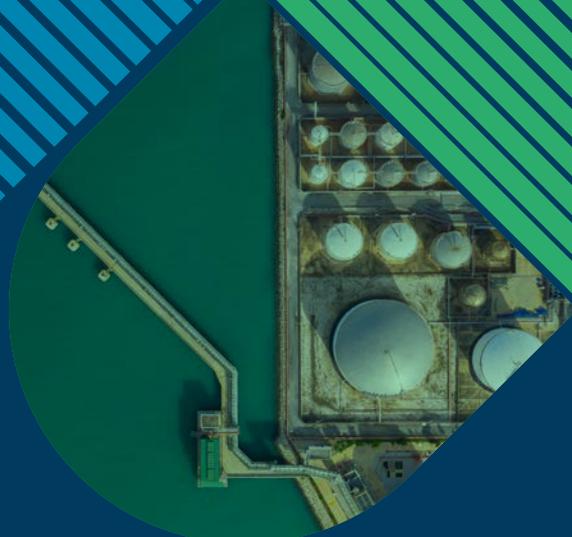
**BULGARIA**

Benzin Bg - [www.benzin.bg](http://www.benzin.bg)

**SWITZERLAND**

AVIA International  
[www.avia-international.com](http://www.avia-international.com)

# CONTEXT



# THE EU POLICY CONTEXT IN 2021

## EUROPEAN CLIMATE LAW

On 30 June 2021, the European climate law was definitely adopted as Regulation and entered into force on 29 July 2021, setting into legislation the objective of a climate-neutral EU by 2050.

In addition to the goal of climate neutrality and an aspirational goal for the Union to strive to achieve negative emissions after 2050, the European climate law sets a binding Union climate target of a reduction of net greenhouse gas emissions (emissions after deduction of removals) by at least 55% by 2030 compared to 1990.

rational goal for the Union to strive to achieve negative emissions after 2050, the European climate law sets a binding Union climate target of a reduction of net greenhouse gas emissions (emissions after deduction of removals) by at least 55% by 2030 compared to 1990.

**WHAT IS INCLUDED IN THE EUROPEAN CLIMATE LAW?**

- An EU-wide legal target for climate neutrality by 2050 that binds the EU Institutions and national governments.
- Creating a predictable business environment for industry and investors, with the pace of emission reductions mapped out from 2030 to 2050, showing them what needs to be done, and at what speed.
- A process to include in the Climate Law the updated 2030 emissions reduction target.
- A mechanism for keeping everybody on track – with regular reporting on progress and tools to catch up if anyone falls behind.
- A focus on the effective transition towards a fair and prosperous society, with a modern, resource efficient and competitive economy.
- A renewed focus on adapting to the impacts of climate change to strengthen Europe's resilience, including for its vulnerable communities.

## SUSTAINABLE FINANCE PACKAGE

On 21 April 2021, the European Commission adopted a package of measures to help improve the flow of investments towards sustainable activities across the European Union. The purpose of these measures is to enable investors to re-orient investments towards more sustainable technologies and businesses. It includes:

- » The EU Taxonomy Climate Delegated Act, which sets criteria for economic activities in relation with climate neutrality and climate change adaptation objectives.
- » A proposal for a Corporate Sustainability Reporting Directive, which sets the sustainability criteria and standards that companies will have to address in their sustainability report.

The EU Taxonomy is a green classification system that

translates for investment purposes the EU's climate and environmental objectives into criteria for specific economic activities. It recognises as green, or 'environmentally sustainable', economic activities that make a substantial contribution to at least one of the EU's climate and environmental objectives, while at the same time not significantly harming any of these objectives and meeting minimum social safeguards.

This first delegated act under the EU Taxonomy on climate objectives sets criteria for economic activities in the sectors that are most relevant for achieving climate neutrality and delivering on climate change adaptation. This includes sectors such as energy, forestry, manufacturing, transport and buildings. It fits into the mandatory disclosure obli-

gations on some companies and investors, subjected to non-financial reporting requirements. This disclosure of the proportion of taxonomy-aligned activities will allow for the comparison of companies and investment portfolios. In addition, it can guide market participants in their investment decisions. Nevertheless, the EU Taxonomy is not a mandatory list of economic activities for investors to invest in. Nor does it set mandatory requirements on environmental performance for companies or for financial products. Investors are free to choose what to invest in. The Draft Delegated Act on Objectives 1-2 of the Taxonomy Regulation is favourable to bioenergy, and explicitly supports the manufacture of biofuels for use in transport, while however excluding the use of food and feed crops.



## RECOVERY AND RESILIENCE FACILITY (RRF)

The Recovery and Resilience Facility (RRF) entered into force in February 2021 with the aim of preparing Member States for a sustainable recovery following the COVID-19 pandemic and economic crisis, by offering large-scale financial support for investment and reforms.

As a rule, Member States were invited to notify their natural recovery and resilience plans before 30 April 2021 but were subsequently allowed to do so at any point in time until mid-2022. Once these plans are submitted, the Commission assesses Member States' plans within two months after submission and translates their content into legally binding acts. Based on a proposal by the Commission, the Council

has as a rule four weeks to adopt the Commission proposal. The Council's approval would pave the way for the disbursement of a 13% pre-financing.

Most of the national plans submitted include subsidies dedicated to the construction of electric charging stations and hydrogen refuelling points. UPEI encouraged UPEI members to review national plans as endorsed by the European Commission, in order to identify opportunities for funding. Besides the national plans themselves, useful details on these subsidies are available in Annex to the Proposal for a Council Implementing Decision on the approval of the assessment of the recovery and resilience plan for each country.

## FIT FOR 55 LEGISLATIVE PACKAGE

On 14 July 2021, the European Commission released its "Fit for 55" policy package, made of over 13 legislative proposals, including the review of 8 pieces of legislation and 5 new initiatives. It was accompanied by a Communication entitled 'Fit for 55 – delivering the EU's 2030 climate target on the way to climate neutrality'. Overall, the package is designed to update EU laws to meet the new 2030 emissions reduction target of 55% (raised from 40% in the previous package). UPEI welcomed the publication of the "Fit for 55" policy package, but underlined that more should be done, to put Europe effectively and cost-efficiently on a firm path towards climate neutrality. The opportunity was also missed to reaffirm the role of low carbon and renewable fuels in decarbonising the transport sector and to establish technology neutrality, as we stated in our Press Release ([here](#)) and in a joint statement with other associations in the sector (see [here](#)).



### – EU Emission Trading Scheme

The ambition and the scope of the EU ETS is increased, with the full inclusion of aviation into ETS, and its extension to emissions from the maritime sector. In addition, an adjacent system for buildings and road transport is proposed, according to which fuel suppliers have to buy and trade allowances, starting in 2026. Under this new system, the entities regulated are tax warehouses or other persons liable for excise duties. In practice, regulated entities need to apply for a GHG emission permit, set up a monitoring and reporting plan, report annually on volumes and end-use of the fuels they put into consumption, and surrender the number of allowances corresponding to the emission of the volume of fuels they put on the market the previous year. The cost increase is expected to be fully passed onto consumers. For your information, a carbon price of between 30 and 90 EUR/tonne was used for modelling impacts.

### – Renewable Energy Directive

According to the proposed revision, the share of renewable energy should represent at least 40% of the Union's gross final consumption of energy in 2030. In parallel, the amount of renewable fuels and renewable electricity supplied to the transport sector should lead to a greenhouse gas intensity reduction of at least 13% by 2030. Alongside, new sub-targets for the share of e-fuels and advanced bio-fuels in transport fuels are set. Regarding heating & cooling, planned replacement schemes of fossil heating systems or fossil phase-out schemes are suggested as measures that Member States could take, among others, to support the achievement of the new target of minimum of 1.1 ppt annual increase of the share of renewable energy, with additional national indicative targets. Importantly, the existing multipliers are removed, fuel suppliers are offered the possibility to trade credits, and the 6% GHG reduction target under the Fuel Quality Directive is repealed.

### – CO<sub>2</sub> Standards for Cars and Vans

The proposal requires average emissions of new cars to come down by 55% and of new vans by 50% by 2030, and 100% from 2035, effectively banning sales of new cars and vans with an internal combustion engine as of 2035. A tail-pipe approach to emissions is kept, and the consideration of renewable fuels is not included. There will be a "progress report" every 2 years, that will also investigate fuels.

### – Alternative fuels infrastructure Regulation

The Commission has put forward a Regulation to replace the current Directive, in which it proposes setting binding targets for Member States. According to this proposal, the role for alternative fuels other than electricity and hydro-

gen is limited (except to some extent for LNG for trucks up until 2025), which is reflected in the small change brought to the definition of alternative fuels. It sets concrete targets for electric charging points deployment, in terms of power output, distance between two recharging point and charging speed, differentiating infrastructure for light-duty and for heavy-duty vehicles, and hydrogen refuelling capacity. Moreover, specific requirements on operators are also set, to offer ad hoc charging and to accept electronic payments, with prices to be transparent (clearly displayed) and non-discriminatory. The Regulation proposal incorporates existing requirements in terms of fuel labelling and price comparison but concludes that they do not need strengthening. The proposal also set targets for the deployment of alternative fuels infrastructure in maritime and inland waterway ports and airports.

### – Energy Taxation Directive

The new proposal sets minimum rates calculated in EUR/GJ on the basis of net calorific value of the energy products and electricity (e.g. 10.75 EUR/GJ for fossil motor fuels, with reduced rates for gas and renewable fuels). Fuels used for the purpose of intra-EU maritime and air navigation will also be taxed (0.9 EUR/GJ). The scope of the products covered is broaden, and there is no more distinction between commercial and non-commercial use of gas oil as motor fuel, nor between business and non-business use for heating fuels and electricity. Member States keep the possibility to apply exemptions or reductions for renewables, they can go beyond minimum rates but must replicate the ratio between different energies as an attempt to foster harmony in the internal market. Minimum rates are annually indexed on inflation.

### – FuelEU Maritime – Green European Maritime Space

The proposal sets obligations on ship owners or operators to reduce the GHG intensity of fuels for all ships above a gross tonnage of 5000, regardless of their flag, calling at EU ports as follow: -2% from 2025; -6% from 2030; -13% from 2035; -26% from 2040; -59% from 2045; -75% from 2050. They can do so by incorporating low carbon (including LNG) and renewable fuels.

### – FuelEU Aviation – Sustainable Aviation Fuels

Fuel suppliers will be obliged to blend increasing levels of sustainable aviation fuels (SAF) in jet fuel taken on-board at EU airports, including synthetic low carbon fuels, known as e-fuels, as follow: 2% in 2025; 5% in 2030 (0.7% of synthetic fuels); 20% in 2035 (5% of synthetic fuels); 32% in 2040 (8% of synthetic fuels);

63% in 2050 (8% of synthetic fuels). SAF are RED compliant synthetic aviation fuels, advanced biofuels, and sustainable waste-based biofuels (Part A and B of the RED Annex IX).

**– Energy Efficiency Directive**

According to the proposal, Member States shall collectively ensure a reduction of energy consumption of at least 9% in 2030 compared to the projections of the 2020 Reference Scenario so that the Union’s final energy consumption amounts to no more than 787 Mtoe and the EU’s 2030 primary energy consumption amounts to no more than 1023 Mtoe in 2030. Member States can still use energy efficiency obligation schemes, alternative policy measures, or a combination of both, or other programmes or meas-

ures to achieve energy savings in various end-use sectors including transport.

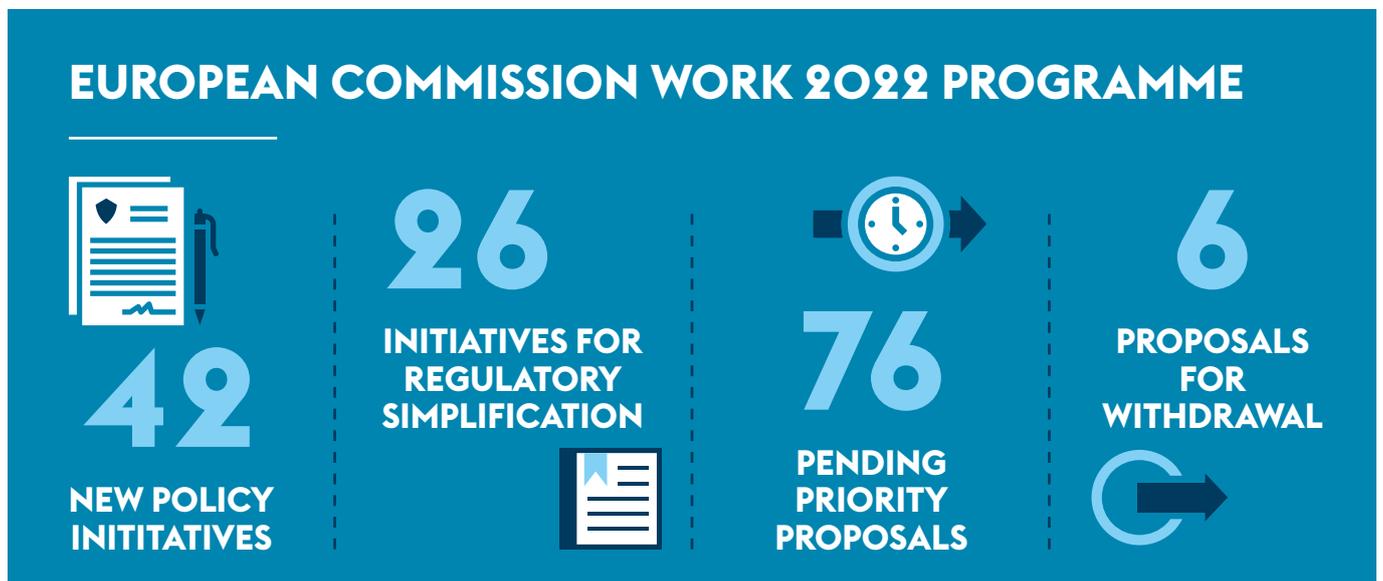
**– UPEI’s follow up of the Fit for 55 Package**

- » UPEI Experts and the Secretariat, supported by the policy consultant Weber-Shandwick, undertook a thorough assessment of the proposals and presented them to all UPEI members during a webinar on Tuesday 7 September.
- » In the context of UPEI engagement strategy on the “Fit for 55” package and in order to convey the sector’s views on the relevant legislative files, the UPEI Secretariat developed a package for its members, which included a PowerPoint presentation, a list of relevant MEPs, together with all the relevant position papers (available on the UPEI website, in the library section).

**EUROPEAN COMMISSION 2022 WORK PROGRAMME**

On 19 October 2021, the Commission published its 2022 Work Programme. This is an annual exercise allowing the Commission to announce the upcoming new policy and legislative initiatives, REFIT (reg-

ulatory simplification) and possible withdrawals. It focuses on the main legislation and does not include small amendments or technical regulations, nor is it exhaustive.



With this work programme, the Commission tried the deployment of the ‘one-in, one-out’ approach for the first time. This should ensure that if a new piece of legislation introduces unavoidable new burdens, it should reduce burdens contained in existing EU legislation in the same policy area.

Amongst its main priorities are the deployment of the European Green Deal and the objective of making Europe the world’s first climate neutral continent by 2050, with, notably, a review of the CO<sub>2</sub> emission standards

for heavy-duty vehicles and a legislative framework for the harmonised measurement of transport and logistics emissions to support the transition towards zero-emission mobility. Green bonds will play an increasingly important role in the financing needed for the decarbonisation of the European economy, as part of the implementation of the Sustainable Europe Investment Plan. The Commission will also propose a (targeted) revision of the REACH regulation and a revision of the legislation on classification, labelling and packaging of chemical products.

# ACTIVITY REPORT



# POLICY REPORTS

Ahead of the publication of the “Fit for 55” policy package in July 2021, the European Commission launched a series of open public consultations to gather stakeholders’ views on updating existing sectoral legislation in line with the climate target plan’s 55% net reduction target. UPEI contributed to those consultations relevant to UPEI members, namely the Renewable Energy Directive, the Emission Trading Scheme, the Effort Sharing Regulation, the CO<sub>2</sub> standards for light duty vehicles, the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD).



## TRANSPORT & FUELS

### – Renewable Energy Directive

**Expert: UTA WEISS, Fuel quality and biofuels**

One legislative amendment that has fostered considerable discussion in 2021 is the Renewable Energy Directive (RED). The objective of the upcoming review of the RED, originally foreseen for June 2021, is to reach more ambitious climate targets and promote different types of fuels (e.g., advanced biofuels, renewable hydrogen and synthetic fuels). UPEI contributed to the public consultation launched by the European Commission in January 2021, by providing feedback which can be summarized as follow:

- » The new REDIII should be more prescriptive to achieve a more effective and harmonised implementation across Member States for the smooth functioning of the EU Internal Market.
- » Raising the overall level of ambition by expanding the scope of the directive should not question previously agreed principles. Thus, sustainability criteria should not be open for review, and feedstocks should not be removed from lists in current REDII annexes.
- » Current double counting and multipliers artificially inflate the numbers and incur distortions between different solutions – they should be removed or replaced by technology open multipliers.
- » All technology options which contribute to climate mitigation should be promoted, including hydrogen, e-fuels and other low carbon fuels alongside renewables.
- » The “energy efficiency first” principle should be expanded to reward those renewable energies that can be supplied and distributed through the existing infrastructure.
- » REDIII should focus on substituting fossil energy by renewable energy, and not on the replacement of heating appliances.
- » Regulatory inconsistencies between different pieces of legislation (e.g. the Fuel Quality Directive) should be removed.

### – CO<sub>2</sub> standards for light duty vehicles

**Expert: JOHAN DELEU, Sustainable transport**

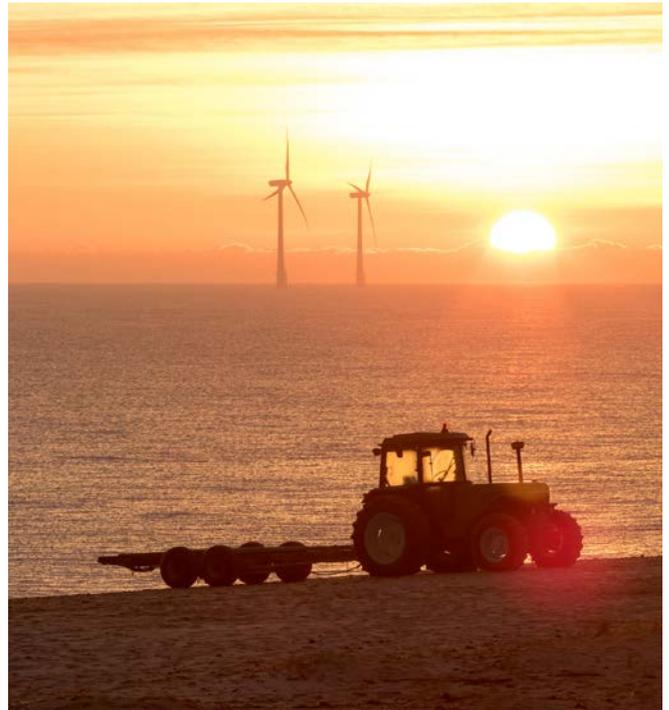
The European Commission proposes that all sectors of the economy contribute to the recently increased ambition of cutting emissions by 55% by 2030 (in com-

parison with 2005 levels).

The current legislation on light duty vehicles (LDV) CO<sub>2</sub> standards sets reduction targets of 15% for cars and vans to be achieved from 2025 onwards, and of 37.5% for cars and 31% for vans to be achieved from 2030 onwards, compared to 2021. In addition, the Regulation proposal contains a mechanism aimed to incentivise the deployment of zero and low emission vehicles. UPEI's response to the Commission consultation disregarded the questions relating to the requirements for automotive manufacturers, to focus on the questions related to the contribution of renewable and low carbon fuels.

To summarize, UPEI put forward the following points:

- » We question the definition of 0 emission vehicles used by the European Commission and state that the current system should be reconsidered to move away from a tailpipe-only approach.
- » A carefully designed system to account for the contribution of renewables and low carbon fuels can boost synergies and avoid negative effects:
  - › This system could boost the availability of renewable and low carbon fuels (RLCF), by creating a stable, long-term secured market, which would lead to increased volumes for other modes such as maritime and aviation.
  - › Double counting can be avoided through the establishment of a tracking system in line with REDII.
  - › It is a common and globally recognised practice to count emissions produced from the combustion of renewable fuels as zero.
  - › Full coherence with REDII, regarding the definition of eligible fuels and sustainability criteria, should be ensured.
  - › The price of RLCF will decrease but remain higher than conventional fuels, therefore maintaining a strong incentive for energy efficiency improvement. Similarly, it would not affect OEMs incentive to place electric vehicles on the market as they cannot meet their target without it.
  - › This system could leave the division of responsibilities between fuel producers and OEMs untouched but provide a mechanism to ensure a variety of vehicle types remain on the market.
- » Overall, emission reductions from road transport cannot be achieved simply by improving the performance of new vehicles. Accelerating the production of renewable and low carbon fuels with the continued development of a range of new vehicles optimised for these fuels, can have a climate-positive impact today



via the existing and future vehicle fleet, for LDVs but also HDVs and other applications.

Together with a coalition of industry associations supportive of renewable fuels, UPEI organised on 8 October 2021 a workshop on the recognition of sustainable renewable fuels in the EU climate policy, with a focus on the CO<sub>2</sub> standards for cars and vans. This workshop gathered around 40 government representatives from 10 Member States.

### – Fuel Quality Directive

**Expert: UTA WEISS, Fuel quality and biofuels**

On 20 April 2021, UPEI attended a stakeholder workshop on the review of the Fuel Quality Directive – article 7a –, which set the objective to reduce the greenhouse gas intensity of fuels by 6% by 2020. Inconsistencies with the Renewable Energy Directive, and market fragmentation in the implementation of this provision at national level, were clearly identified in the evaluation report. Looking at the future, the European Commission is currently exploring various options: continuing, discontinuing or strengthening the obligation towards 2030, as well as the extension of the scope of fuels covered (including gaseous), market-based compliance options and the direct regulation of fuel suppliers at EU level. UPEI expects this obligation to be aligned with the Renewable Energy Directive which will be revised, starting with a legislative proposal in July 2021.

## – Deployment of Alternative Fuels Infrastructure

 Expert: JOHAN DELEU, Sustainable transport

On 8 March 2021, the European Commission published a report on the application of Directive 2014/94/EU on the deployment of alternative fuels infrastructure (AFID). The report was accompanied by a Staff Working Document providing a detailed assessment of the Member States Implementation Reports on the National Policy Frameworks for the development of the market as regards alternative fuels in the transport sector and the deployment of the relevant infrastructure. The Commission made an in-depth assessment of the national implementation reports as received from the Member States and also carried out an external support study in the context of the ongoing evaluation of that Directive. Moreover, the Commission updated its report on the state of art on alternative fuels transport systems in the EU.

The analysis shows the importance of the AFID in triggering the development of policies and measures for roll-out of alternative fuels infrastructure in Member States, by transposing the Directive into National Policy Frameworks (NPFs). The Directive has had a positive impact on the uptake of alternatively fuelled vehicles and their infrastructure.

However, the shortcomings of the current policy framework are also clearly visible: as there is no detailed and binding methodology for Member States to calculate targets and adopt measures, the level of ambition in target setting and supporting policies in place varies greatly between Member States. For example, the share projected by Member States for electric cars in the total car fleet for 2030 varies between less than 1% and more than 40%. The corresponding infrastructure targets reflect the different level of ambition, meaning that the planned deployment of infrastructure varies greatly between Member States.

UPEI encouraged its members to investigate the detailed assessment for their own countries.

In its position paper issued on 26 October 2021, based on the Commission proposal of 14 July for a revision of the AFID, UPEI insisted on the following recommendations:

- » It is essential to maintain a broad definition of alternative fuels, encompassing a wide range of solutions, allowing to effectively bring the emissions of diverse vehicles and uses down, in the short term as well as in the longer term;
- » Supply and demand-side measures should go hand-

in-hand, to avoid the artificial development of a refuelling infrastructure which would not be justified by consumer demand and enhancing an ecological, economical and socially acceptable transition. UPEI therefore welcomes the fact that electric charging targets for light-duty vehicles (LDV) are partly fleet-based;

- » In order to boost investment into electric charging infrastructure, in a way that is commensurate with the deployment ambition set out in the proposal, provisions on costing and payment should remain practical, allowing independent players to compete fairly, and should not harm first movers.

The position paper concluded that It is essential that the obligations arising from the AFID review and their impact on industry and consumers be examined not in isolation but together with other 'Fit for 55' proposals, including the proposals for the revision of the Energy Taxation Directive, the Emission Trading Scheme, the Energy Efficiency Directive, the Renewable Energy Directive as well as the FuelEU Maritime proposal. Negotiations should be conducted with a view at the entire package to avoid regulatory inconsistencies, maximise synergies and guarantee the most cost-effective achievement of the objectives.

### – New Renewable & Low-Carbon Liquid Fuels Platform

The major organisations operating in the liquid fuels value chain (Advanced Biofuels Coalition, Copa-Cogeca, eFuel Alliance, ePURE – European renewable ethanol, EBB-European Biodiesel Board, EWABA, Fediol, FuelsEurope, Nordic Blue Crude AS, UPEI) have joined forces to form the Renewable & Low-Carbon Liquid Fuel Platform. The group is working together to contribute to the decarbonisation of the mobility sector in a sustainable and affordable way, representing companies acting at different steps of the value chain, from feedstock and fuel production to supply and distribution, making up a substantial part of the sustainable renewable fuels' ecosystem.

The Platform is intended to act as an enabling forum for our collective communication and aims at exchanging views and best practices on the energy transition and the decarbonisation of all transport modes. The Platform will also publicly share their views on the design of regulations, necessary for developing business cases for the investments in low-carbon liquid fuels.



## PAYMENT SOLUTIONS

**Expert: ONDŘEJ JANČAŘÍK, Fuel Cards**

The work of the UPEI Fuel Payments Commission through 2021 focused on the ongoing impact of the Vega International case law of the European Court of Justice (ECJ) on many European countries.

In Latvia, VAT authorities have decided to apply the European Court of Justice (ECJ) decision on the Case C-235/18 Vega International Car Transport and Logistic broadly to the purchase and sale of fuels with fuel cards. Fuel card issuers active in the Latvian market received a letter from Latvian authorities stating that they are not considered as the sellers of the fuel anymore, and that they are obliged to correct all of their invoices back till October 2020. This has triggered a discussion, and authorities are now open to listening to arguments of fuel card issuers.

In Denmark, the Danish Tax Agency initially took the same approach, but thanks to concerns voiced now put the process on hold for at least 6 months and reverted to the existing rules. UPEI sent a letter to the Danish and Latvian tax authorities to express our views on the interpretation of the Vega case and raise awareness on the potential impact of a change to the status quo.

We have seen a lot of value in exchanging information within our Fuel Payments commission, to keep up-to-date on different initiatives and discussions happening at national level following the ECJ Vega decision. That is why it was agreed to extend the collaboration to other companies active in the field outside UPEI membership, to cover more countries and gather more intelligence on these developments. Hence, the Fuel Payments commission organised a web meeting on 29 June 2021 aiming at having a first discussion, where was confirmed the different organisations' interest in establishing an informal and ad hoc forum to regularly exchange information on related developments at national level.

### – Payment Services Directive (PSD2)

The European Banking Authority (EBA) launched a public consultation on the draft Guidelines providing clarity on the application of the limited network exclusion requirements, which certain payment instruments might benefit from, as laid down in the revised Payment Services Directive (PSD2). Given the significant inconsistencies, the EBA has identified how this exclusion is applied across the EU, the proposed Guidelines aim at clarifying specific aspects

of its application, including on how a network of service providers or a range of goods and services should be assessed in order to qualify as 'limited', the use of payment instruments within limited networks, the provision of excluded services by regulated financial institutions and the submission of notification to competent authorities. On 15 October, UPEI contributed to the European Banking Authority (EBA)'s consultation on the draft guidelines on the limited network exclusions under the Payment Services Directive. In its response, UPEI emphasized on the peculiarity of fuel cards as transaction authorisation cards, and on the need to keep the exclusions practical and applicable to diverse business models. The EBA guidelines will be finalised in spring 2022 and start applying in October of the same year.





## TAXATION & PRICING

Expert: INGA TÖLKE, Taxation

### – Energy Taxation Directive

The review of the Energy Taxation Directive (ETD) was launched by the European Commission in July 2021, with a proposed revision as part of the Fit for 55 package. The purpose is to update and bring the framework in line with the European Green Deal.

In its position paper of 21 October, UPEI welcomed

- » The abolition of several optional tax reductions and exemptions, and the obligation for Member States to keep the same ranking between different energy products when setting their own rates, as it will foster convergence and improve the functioning of the internal market;
- » The change to an energy-based tax (alongside the Emission Trading Scheme setting a price on carbon), as it will incentivise energy efficiency and support low carbon and renewable fuels;
- » The maintenance of a sector-based approach to reflect different challenges each faces

UPEI also made a number of recommendations:

- » In light of the risks of the relocation of fuel bunkering outside the EU and carbon leakage, keep the mandatory tax exemption as a general rule for energy products supplied for use as fuel for the purposes

of maritime navigation. Should the removal of the exemption be pursued, introduce measures to alleviate these risks.

- » Create a level-playing field for different solutions based on their climate performance by ensuring a fair treatment for sustainable crop-based biofuels and introduce different rates for renewable and non-renewable electricity.
- » Give a strong price signal in support of low carbon and renewable fuels by guaranteeing that lowest rates apply consistently across Member States.
- » Make the implementation of the new rates and fuel categories practical, from a logistical perspective, especially for blended fuels.

### – EU Emissions Trading System

One key mechanism that has undergone a revision under Fit for 55 is the EU Emissions Trading System (EU ETS).

The EU ETS is a cap-and-trade system that currently governs 41% of the EU's emissions, covering power and heat generation, energy-intensive industrial sectors and aviation. The Communication on stepping up the EU's 2030 climate ambition explicitly indicates the need to revise the EU ETS in light of the 55% target. This includes the extension of the EU ETS to the maritime sector, and the option expanding this concept to road transport and buildings, and potentially all fossil fuels use.

UPEI response to the consultation launched by the Commission disregarded the questions relating to the current functioning of the ETS, as UPEI members are not subject to it, and focuses on the questions related to the extension to the maritime sector and the possible expansion to road transport and buildings.

It was difficult to express a clear view on this project of expanding the emission trading to buildings and transport, as we lack information on how such a system would be designed. On the one hand, an ETS would be welcome as a market-based and cost-effective tool to reduce GHG emissions. On the other hand, an ETS in addition to the legislation already in place could add another layer of complexity in an already intricate regulatory framework for fuels and incur excessive administrative burden for independent fuel suppliers.

To summarise, UPEI put forward the following points:

- » The ETS should contribute to reaching the higher ambition level set for 2030.
- » In the long term, a single CO<sub>2</sub> market across the economy would be desirable, but we recognise the need to have several sector-based systems in the short term, should an ETS be chosen for transport and buildings.
- » We do not support a system only covering all fossil fuel





combustion, but all energies, with renewable energies counted with an emission factor of 0 to reflect their carbon neutral performance over the life cycle.

- » For the maritime sector, although that action at International Maritime Organisation (IMO) level should be preferred, we support the extension of ETS in line with the requirements of the current MRW Regulation in monitoring, reporting and verification of CO<sub>2</sub> emissions from maritime transport.
- » Overall the ETS system has the potential to reduce emissions in a more cost-effective manner than sectoral standards and regulations. However, we call policy makers to carefully consider the following issues: administrative burden, policy consistency, social impact, effectiveness and fair competition.

### – Customs & Excise Duties

Following the adoption of Directive (EU) 2020/262 laying down the general arrangements for excise duty (also called the horizontal Directive), the Commission started preparing a delegated act to establish common partial loss thresholds during the transport of excise goods under duty suspension.

At a European Commission stakeholder workshop organised on 30 March 2021, the Customs and Excise Duty Working Group, made of UPEI, FETSA and FuelsEurope, delivered a presentation explaining the technical justification for tolerances and highlighting the wide diversity of rules across Europe. The European Commission aims at creating consensus across Member States and operators, to propose common thresholds by the end of 2021.



## BUNKERING / MARINE FUELS

**Expert: ERIK DE VRIES, Maritime Transport**

### – FuelEU Maritime

The Bunkering Commission focused its activities in 2021 on the Commission proposal for a FuelEU Maritime proposal and on the revision of the ETD.

Regarding FuelEU Maritime, in its position paper of 3 November, UPEI stated its support to the objective of cutting GHG emissions from the maritime transport sector, therefore contributing to EU climate neutrality objective. It also welcomed the focus on limiting the greenhouse gas (GHG) intensity of energy used on-board by ships, considered from a well-to-wake perspective, in line with the principle of technology neutrality.

Regarding the regulated entities, UPEI underlined that it strongly believes that the obligation should apply to shipping companies, as proposed by the European Commission. This is crucial to create a demand for renewable and low carbon fuels in the maritime transport sector, building on existing regulatory requirements such as the Monitoring, Reporting and Verification Regulation, while ensuring a level playing field for European bunker suppliers and preventing carbon leakage. This is fully evidenced in the European Commission impact assessment, which also recognises

that existing requirements on fuel suppliers under the Renewable Energy Directive (RED) and the Alternative Fuels Infrastructure Directive (AFID) have not managed to trigger the deployment of renewable and low carbon fuels in maritime transport.

UPEI insisted that the obligations arising from this Regulation and their impact on industry and consumers should be examined not in isolation but together with other 'Fit for 55' proposals, including proposals for the RED review and the AFID. Negotiations should be conducted with a view at the entire package, to avoid regulatory inconsistencies, maximise synergies and guarantee the most cost-effective achievement of the objectives.

### – Energy Taxation Directive

As part of its position paper on the ETD published on 21 October, UPEI outlined the maritime sector's specificities:

The Commission proposes to introduce a 0.9 EUR/GJ tax on gasoil and marine fuel oil, with lower rates for alternative and renewable fuels, to intra-EU waterborne regular service navigation, fishing and freight transport, including domestic navigation, as of 2023. However, it does not foresee any mechanism to ensure that only the fuel effectively used for intra-EU maritime navigation is taxed. UPEI is concerned by this proposal for the following reasons:

- » As shipping is a global business and bunkering decisions are very price sensitive, the introduction of a tax could affect European bunker suppliers' ability to compete on the same footing with suppliers from outside the EU. This could lead to a relocation of bunkering activities outside the EU (including to neighbouring ports and off-shore bunkering facilities in international waters) and related carbon leakage.
- » Seagoing vessels (international commercial shipping) are used for international as well as intra community transports. In some EU countries, bunkering deliveries to seagoing vessels are considered as an export, whatever the destination of the vessel, therefore are dealt with under the customs and not the excise procedures. This could result in a situation in which some Member States would apply the new tax, others not.
- » In practice, vessels sometimes bunker at a time when their destination or net port of call is not yet known, and changes to their itinerary can occur during the voyage. As a result, bunkering companies cannot always know whether the fuel they provide should be taxed.

For these reasons, UPEI believes that only the fuel used for intra-EU regular service navigation, inland waterways and as appropriate intra-EU short-sea shipping, should be subject to excise duty. We recommend keeping the mandatory tax exemption as a general rule for energy products supplied for use as fuel for the purposes of maritime navigation.

Should the removal of the exemption be pursued, we call for the consideration of the following measures to protect the competitiveness of European bunker suppliers (making use of the data collected in the context of the Monitoring, Reporting and Verification Regulation):

- » Introduce obligation for vessels to bunker in the EU (setting an obligation on ship owners or operators as in the FuelEU aviation proposal);
- » Introduce the possibility for shipowners and operators to claim the reimbursement of the excise duty payment on energy products not used for intra-EU maritime navigation, with necessary evidence (albeit this could generate administrative burden incentivising companies to bunker outside of the EU anyways).



### HEATING

 Expert: UTA WEISS, Heating Oil

### – Energy performance of Buildings Directive

On 19 March 2021, together with its three sister associations active in the liquid heating fuels industry, ECFD (European Confederation of Fuel Distributors), Eurofuel (European Heating Oil Association) and FuelsEurope (European Petroleum Refiners Association), UPEI published a Joint Position Paper responding to the European Commission Roadmap on the Energy Performance of Buildings Directive (EPBD). The questionnaire referred to "a timeline to gradually phase out fossil fuels, in particular for heating and cooling systems", which could create opportunities for the introduction of renewable liquid fuels in existing boilers.

We highlighted our support to the EPBD as a measure to help decarbonise the heating sector, as it contributes to higher-performance, comfortable buildings and reduced energy bills for citizens, facilitating the acceptance of the energy transition. We believe that heating with liquid fuels can contribute to the success of this vision, as they provide numerous benefits to consumers and to the wider energy system.

The European Commission also launched a series of 5



workshops aiming to obtain stakeholders' input to the preparation of the revision. The first workshop took place on 31 March 2021 with the aim to gather stakeholders input for the revision of the EPBD. The discussion focused on the development of new metrics to measure GHG emissions from buildings, and the priorities for the review, including minimum standards, performance certificates, long-term renovation strategies etc.

### – Energy Efficiency Directive

The Energy Efficiency Directive (EED), as part of the 'Fit for 55' package and at the heart of EU energy policy, has also undergone a review. It sets EU objectives and indicative targets to Member States, who retain a lot of room for manoeuvre. Fuel suppliers are only indirectly impacted. However, article 7 on the energy efficiency obligation schemes, has directly translated into obligations on energy providers/retailers to achieve a given amount of energy savings (at least 1.5% annually) from annual energy sales to final customers over the period 2014 to 2020. As an alternative to setting up an energy efficiency obligation scheme, Member States may opt to take other policy measures to achieve energy savings among final customers to reach the same amount of savings.

In its position paper of 11 February 2021, UPEI stressed that:

- » The European legislator should focus on better implementation and enforcement.
- » UPEI endorses the “energy efficiency first” principle set out in the legislation, which should be turned into practical provisions, while being mindful of the wide diversity of obligated sectors.

- » The EED should set overall targets and encompass a wider range of sectors to increase ambition. However, we believe that it should focus on buildings rather than heating & cooling, and should leave out transport, which is already covered by a number of regulatory requirements.
- » Overall, policy consistency with other related pieces of legislation should be improved in the context of the “Fit for 55” package.
- » The approach should also be technology neutral, i.e. setting energy efficiency targets without mandating which technologies and energies.
- » UPEI warns against technology bans, which are counterproductive.
- » UPEI calls for the replacement of inefficient and carbon-intensive heating appliances by new appliances, and their combination with renewables in hybrid systems, which can deliver energy efficiency benefits and emission reductions today, and related support measures.
- » UPEI calls for the progressive substitution of fossil fuels by renewable and low carbon alternatives, in a technology neutral manner, and related support measures.
- » UPEI calls for the full consideration of the social dimension, consumer acceptance, affordability, costs effectiveness and potential distributional impacts.



## STANDARDISATION

**Experts: UTA WEISS, Fuel quality and biofuels; TERESA SEYERS, Fuels Labelling**

UPEI is part of the CEN/TC 19 technical committee, dealing with gaseous and liquid fuels, lubricants and related products of petroleum, synthetic and biological origin, and plays an active role in the working groups on specification for unleaded petrol (21), specification of distillate fuels (24) and on new fuels (38).

UPEI is also a member of the CEN/TC441, a project committee developing standards that provide a harmonized identifier of marketed liquid and gaseous fuels. Marketed fuels include petroleum-derived fuel blends, synthetic fuels, biofuels, natural gas, petroleum gas and biogas-based fuels and hydrogen delivered to non-stationary applications.

# UPEI'S ENGAGEMENT ACTIVITIES 2021

**13 MEETINGS**  
with European Institutions  
(stakeholders meetings, workshops and bilateral meetings)



**10 STAKEHOLDERS**  
we have interacted with



**25 CONFERENCES, SEMINARS, WORKSHOPS**  
(events attended as UPEI)



**9 JOINT INITIATIVES**  
with industry partners  
(joint statements, publications etc)

## UPEI POSITION PAPER ON "SOLVING THE FUELS POLICY CONUNDRUM"

Following the publication of UPEI Position Paper "Avoiding regulatory inconsistencies in future policy frameworks" in April 2020, UPEI launched a new Position Paper in April 2021: "Solving the fuels policy conundrum – Recommendations for a holistic and ambitious "Fit for 55" framework". With this new publication, we aim at raising awareness of the inconsistencies amongst existing legislation identified in our first paper, and we propose solutions to policy makers, in order to find the right balance of measures and policies in the "Fit for 55" policy package.

## UPEI/FETSA REPORT "IMPLICATIONS OF THE ENERGY TRANSITION FOR EUROPEAN STORAGE, FUEL SUPPLY & DISTRIBUTION INFRASTRUCTURE"

UPEI and FETSA, the Federation of European Tank Storage Associations, joined forces to fund the study "Implications of the energy transition for the European storage, fuel supply and distribution infrastructure", developed by the economic consultancy Trinomics B.V and published on 6 July 2021.

This study assesses the implications of energy transition for the storage and fuel distribution infrastructure terminals, pipelines, tanks and depots, trucks/wagons/vessels/barges and retail stations. By exploring several cases of substituting conventional fossil fuels, it clearly indicates that a large part of the existing storage and distribution infrastructure can be repurposed to accommodate renewable and low carbon liquid fuels, without any change or with limited modifications.

Based on this conclusion, the study draws important takeaways and develops practical recommendations for EU and national policymakers and actors in the supply chain.

The study was presented to UPEI and FETSA members on 6 July in a webinar.

## UPEI GUIDANCE DOCUMENT "COMPATIBILITY OF RETAIL STATION INFRASTRUCTURE WITH HIGHER BIOFUEL BLENDS"

In the future it is likely that the use of renewable biofuels will increase as further measures are introduced to reduce the amount of greenhouse gas emissions from the transport sector. Biofuels such as ethanol and biodiesel have properties that are somewhat different from those of fossil fuels and the purpose of this guide is to highlight compatibility of the general material types commonly found within the fuelling infrastructure and these newer biofuel components. Most newer fuel retail stations have been constructed with consideration for the future role of biofuels in the fuel matrix. This and the relatively low blend rate of biofuels has mitigated any concern over incompatibility. However as the blend rate of these biofuels increases then the compatibility of materials found within the fuel systems at retail stations is a potential concern. The results of compatibility studies presented in this document can only serve as a guide. In practice compatibility is a function of many different factors. It is important to check with the original equipment manufacturer or supplier that any equipment installed is fully compatible with fuel to be stored and dispensed at the retail station. Where this is not possible, for example with legacy equipment, then it is recommended to establish a routine monitoring programme to verify that equipment and materials are performing as expected.

# UPEI BUSINESS PARTNERSHIP

In the ongoing energy transition towards a low carbon economy, UPEI had identified the increasing importance – for companies and fuel businesses – of having a strong presence in Brussels and access a wide range of expertise from within the independent energy sector as well as related sectors. In order to respond to this need, in 2017 UPEI has launched its Business Partnership (BP), with the aim to include forward thinking companies who are directly or indirectly involved in the fuel supply business and who support UPEI mission.

In 2021 UPEI engaged with 12 Business Partners (BPs), offering several opportunities to learn about the latest European policy developments, join meetings with guest speakers and key players in the industry, meet their peers and extend their network.

## UPEI'S BUSINESS PARTNERS



# UPEI RESPONSE TO COVID-19

UPEI continued to respond to the COVID-19 pandemic and its challenges by exploring alternative digital strategies and implementing several tactical steps to adapt its programmes, establish and expand virtual collaboration, and other actions in view to guarantee exchange of information between UPEI members. This took the form of:

» Supporting our members by acting as a hub for information and best practices sharing on concrete national measures implemented by Member States to

counteract the effects of the COVID situation collecting information on national markets resilience and the impact of the pandemic at country level, while constantly updating UPEI members on the latest State Aid rules aiming to help overcome the situation triggered by the COVID outbreak.

» Further strengthening our online presence by organising online meetings and events. For instance, UPEI had once again to replace its 2021 Spring General (face-to-face) Meeting by an online web meeting, and slowly started to come back to “normal” with a hybrid general Meeting in Autumn.

## UPEI EVENTS

13 JANUARY 2021

UPEI online event

**REFLECTING ON THE SUSTAINABLE AND SMART MOBILITY STRATEGY: HOW TO FUEL THE TRANSITION?**



**UPEI ONLINE EVENT**  
Reflecting on the Sustainable and Smart Mobility Strategy: how to fuel the transition?

13 January 2021  
14:00 - 15:15  
Online

6 JULY 2021

UPEI-FETSA joint study

**IMPLICATIONS OF THE ENERGY TRANSITION FOR THE EUROPEAN STORAGE, FUEL SUPPLY AND DISTRIBUTION INFRASTRUCTURE**

### Webinar

Tuesday 6 July 2021 | 10am (CET)

**Implications of the energy transition for European storage, fuel supply & distribution infrastructure**



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# OTHER EVENTS

**23 FEBRUARY 2021**

## **LIQUID GAS EUROPE – BIOLPG: A RENEWABLE PATHWAY TOWARDS DECARBONISATION BY 2050**



Panel discussion:  
Cécile Nourigat speaker

**28 MAY 2021**

## **ESPO CONFERENCE REGATTA 2021**

Debate on "Coalition-building as fast track to zero emission transport solutions": Cécile Nourigat speaker



**26 NOVEMBER 2021**

## **OIL & NON OIL 2021**

L'Europa verde e il futuro del mercato dell'energia:  
Alice Di Pace speaker



# UPEI PUBLICATIONS ISSUED IN 2021

## DOCUMENTS

- » UPEI position paper "Solving the fuels policy conundrum"
- » Guidance document on retail stations equipment compatibility
- » Joint Study "Implications of the energy transition for European storage, fuel supply & distribution infrastructure"

## STATEMENTS

### MARCH

- » Joint Position: Energy Performance of Buildings Directive (EPBD)

### MAY

- » Joint Statement: The Renewable & Low-Carbon Liquid Fuels Platform, towards Transport Fuels' Transformation
- » Joint letter on Renewable Fuels Strategy & Contribution to Vehicle CO<sub>2</sub>
- » Joint letter: Call to include a voluntary crediting system for sustainable renewable fuels into the vehicle CO<sub>2</sub> regulations

### JULY

- » Open letter on the future of the vehicle CO<sub>2</sub> standard
- » UPEI Press Release: Joint UPEI-FETSA Study
- » Joint call for action on Fit for 55 package
- » UPEI Press Release: Fit for 55 package falls short of maximising synergies
- » Joint statement on the Fit for 55 package

### SEPTEMBER

- » Joint letter on a balanced approach to accounting renewable energy electricity for hydrogen production

## POSITION PAPERS

### FEBRUARY

- » UPEI Position: Review of the Energy Taxation Directive
- » UPEI Position: Revision of the Energy Efficiency Directive
- » UPEI Position: Revision of the EU Emissions Trading Scheme

### APRIL

- » UPEI Position: Solving the fuels policy conundrum

### JULY

- » UPEI Position: On ECJ decisions concerning fuel cards in road transport business

### OCTOBER

- » UPEI Position: Amendments to the Renewable Energy Directive
- » UPEI Position: Revision of the EU Emission Trading System
- » UPEI Position: Amendment of the Regulation setting CO<sub>2</sub> emission standards for cars and vans
- » UPEI Position: Proposal for a Regulation on the deployment of alternative fuels infrastructure
- » UPEI Position: Revision of the Energy Taxation Directive

### NOVEMBER

- » UPEI Position: Key considerations on the FuelEU Maritime proposal

## CONSULTATIONS

### FEBRUARY

- » Renewable Energy Directive, Emission Trading Scheme, Effort Sharing Regulation, CO<sub>2</sub> standard for light duty vehicles, Energy Efficiency Directive

### JUNE

- » Energy Performance of Buildings Directive

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# 2021 UPEI ANNUAL REPORT

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