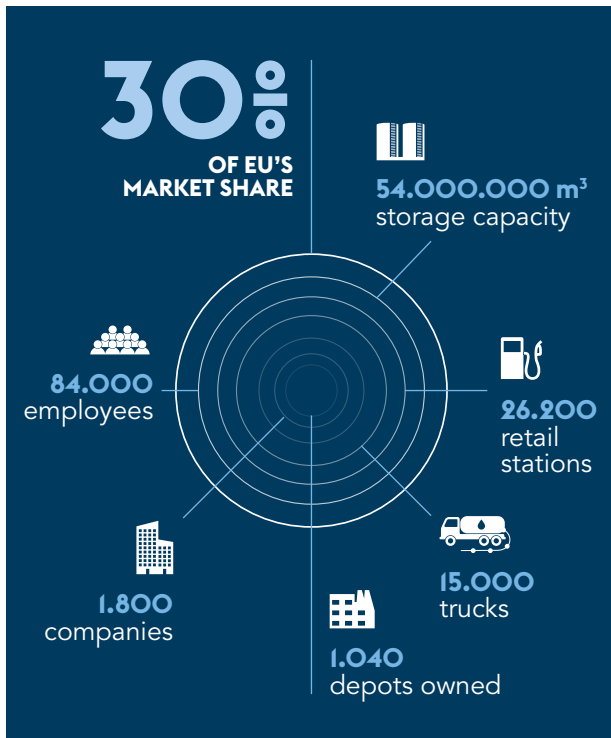


**2025**  
UPEI  
ANNUAL  
REPORT

# SECURING THE ENERGY OF THE FUTURE





**UPEI, the Voice of Europe's Independent Energy and Mobility Suppliers, represents European importers and wholesale/retail distributors of energy and related service providers to European transport and heating customers, independently from the major producers. Operating from the energy production gate to the final consumer, UPEI members supply conventional energy and increasingly its molecule- and electron-based renewable and sustainable alternatives.**

**Independent suppliers, covering more than 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 the security of supply on a local, regional, and national level.**

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# PRESIDENT'S FOREWORD



2025 was a year of change in the shaping of energy policies at international level, it was also a year of change in the way UPEI organises itself to shape and deliver its messages towards our members and the public authorities: we have moved from a "commissions association" to a "topics association".

The second mandate of the European Commission led by Ms. Von der Leyen entered its first full year, influenced, amongst others, by the second Trump Administration, the increasing pressure from the Chinese economy, and the continuation of the war in Ukraine. Pushed by many factors, including the acute need to restore the competitiveness of the EU economy, the 'EU Green Deal' was partially put into question; nevertheless, the legislative agenda was marked by a political agreement between the European Parliament and the EU Council to adopt the revised 'EU Climate Law', with an interim target of 90% emissions reduction by 2040, and a timid opening towards a more technology-neutral approach was shown by the European Commission in its proposal for a revision of the Regulation on CO<sub>2</sub> standards for cars and vans presented at the end of the year.

Beyond competitiveness and the preservation of the carbon neutral trajectory towards 2050, another overarching topic surged in the EU policy debate that also directly affects the energy policy, namely, the security of supply and its military mobility dimension, on which UPEI was very active in 2025: our joint policy event in the European Parliament in February 2025, our series of meetings with Members of the European Parliament on

a report on Energy Security of Supply, and with Permanent Representations, were all devoted to the role which independent energy and mobility suppliers can, and should play, in the new European geopolitical environment.

Our Spring General Meeting 2025 was held in Ljubljana, at the kind invitation and under the great hospitality of our Slovenian Member SNNK. As an outcome of the Roundtables discussions, and building on debates at our Autumn General Meetings 2024 in Rome (Italy) and 2025 in Ljubljana (Slovenia), UPEI members agreed to fundamentally reshape the internal policy structure of UPEI, phasing out our six commissions and setting up output-oriented workshops that discuss an EU policy theme (upcoming strategy or legislative proposal) and involve members in shaping UPEI messages.

Our Autumn General Meeting 2025 was organised with our Belgian association BrafcO, who beautifully hosted us in the historical city of Mechelen. The topic of our roundtables was about "Addressing Europe's security of energy supply - how to maximise the availability of energy products where they are needed?", which included discussions on the energy aspects of military mobility.

Our involvement with EU policymaking was illustrated by many ways:

- » Eight statements and fifteen position papers were issued either as UPEI or as part of informal industry associations coalitions. I would like to thank your experts for their active contribution to the drafting of these documents.



**Within a rapidly evolving geopolitical and policy environment, UPEI has continued to advocate for a pragmatic and technology-neutral energy transition that safeguards Europe's competitiveness and security of supply.**



- » Three workshops were organised in the Autumn 2025, on the EU 2040 target, on the future revision of the Regulation on CO<sub>2</sub> emission standards for cars and vans, and on the EU Affordable Housing Plan/EU Heating and Cooling Strategy. I would like to thank all participants in these workshops for their active contribution. We also kept organising webinars, of a more informative nature, including the quarterly regulatory updates by Weber Shandwick, and a webinar on UPEI's contribution to European standards (TC19 and TC441).
- » UPEI is a member of six EU expert groups: the Excise Contact Group, the Renewable Low Carbon Fuel Industry Alliance (RLCF), the ETS2 stakeholders' group of the Expert Group on Climate Change Policy, the Trade Contact Group, the European Clean Hydrogen Alliance, and the Oil Coordination Group (where UPEI has been invited since 2022 to contribute as a guest).
- » Amongst the various informal industry coalitions to which UPEI contributes, the "Working Group on Monitoring Methodologies for CO<sub>2</sub>-Neutral Fuels" (WGMM) delivered its second report in December<sup>1</sup>.
- » Our work with FETSA in the framework of the "Energy for the Future" project was concluded end December 2025, but we will continue working with our fellow association on an informal basis, particularly in the area of security of energy supply.

In terms of membership, we were happy to welcome in 2025 two new members:

- » from France, as a full member: Union des Importateurs Indépendants Pétroliers - UIP, that brings together the subsidiaries of the supermarket chains supplying fuel; together, these operators hold about 62% of the market for fuels sold in France.

- » from Poland, as a guest member: Polska Izba Paliw Płynnych (PiPP, which is the Liquid Fuel Chamber of Commerce in Poland, representing over 300 companies operating in various segments of the fuel market, primarily retail and wholesale.

A few Business Partners such as UNIMOT and Crop-Energies left us, but we nevertheless hope to keep in touch.



**In 2025, UPEI Members agreed to fundamentally reshape our internal policy structure, moving from commissions to topic-driven workshops to strengthen our ability to shape and deliver our messages to policymakers.**



Finally, our association could not have made these steps forward without the impulsion of my fellow members of the UPEI Presiding Board and Vice-Presidents Erik de Vries (NOVE), Christian Heise (DCC), Ondřej Jančařík (Eurowag), and Carsten Müller (bft), who was re-elected for three years at our Ljubljana General Meeting in April 2025. Let me thank them and the Secretariat for their great support and contribution to the development of our association!

Within an increasingly complex political and policy environment, UPEI continues to plea for a determined and pragmatic climate change policy, based on a technology neutral approach, clarity of regulation, simplification of reporting, and predictable long-term policy environment necessary for investments.

**Johan Deleu**

<sup>1</sup> <https://www.upei.org/download/2962/2246/17?method=view>

# ABOUT UPEI



## UPEI PRESIDING BOARD

**JOHAN DELEU**  
(BrafcO, Belgium)  
**PRESIDENT**

**Erik de Vries**  
(NOVE, The Netherlands)  
**VICE PRESIDENT**

**Ondřej Jančařík**  
(Eurowag, Czech Republic)  
**VICE PRESIDENT**

**Christian Heise**  
(DCC, Denmark)  
**VICE PRESIDENT**

**Carsten Müller**  
(MEW, Germany)  
**VICE PRESIDENT, UPEI MEMBERSHIP DEVELOPMENT**

## UPEI SECRETARIAT

**Pierre Lucas**  
**SECRETARY GENERAL**

**José Luis Mira Mira**  
**COMMUNICATIONS AND OFFICE MANAGER**

## UPEI EXPERTS AND COMMISSION CHAIRS 2025

**Uta Weiss**  
**FUEL QUALITY, BIOFUELS, RETAIL HEATING COMMISSION CHAIR**

**Maximilian Brockmann**  
**COMPULSORY STOCKS OF OIL**

**Ondřej Jančařík**  
**FUEL CARDS, FUEL PAYMENTS COMMISSION CHAIR**

**Cristina Correia**  
**BIOFUELS**

**Erik de Vries**  
**MARITIME TRANSPORT, BUNKERING COMMISSION CHAIR**

**Sarah Schmitt**  
**RETAIL SECTOR**

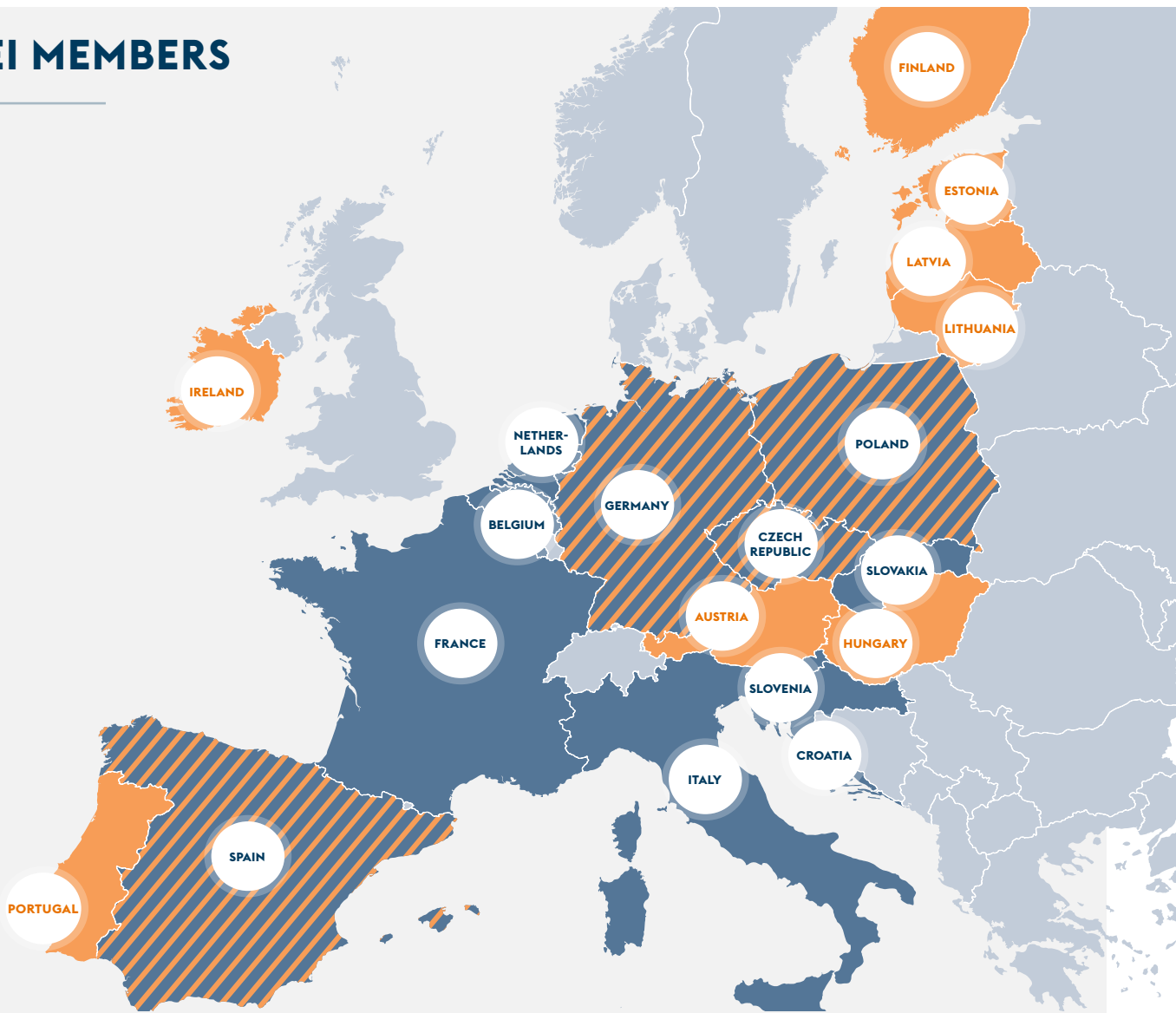
**Letizia Pascualini**  
**ENERGY TRANSITION**

**Johan Deleu**  
**SUSTAINABLE TRANSPORT, IMPORT / TRADE / WHOLESALE COMMISSION CHAIR**

**Inga Tölke**  
**TAXATION**

**Britta Mølgaard Laursen**  
**ENERGY TRANSITION**

# UPEI MEMBERS



## 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)  
UIP – [www.uip.ovh](http://www.uip.ovh)

### GERMANY

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

### ITALY

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

### THE NETHERLANDS

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

### POLAND

PIPP – [www.paliwa.pl/](http://www.paliwa.pl/)  
[paliwa-plynnne/o-paliwach-plynnnych](http://www.paliwa-plynnne/o-paliwach-plynnnych)

### SLOVAKIA

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

### SLOVENIA

SNNK-WPC – [www.world-petroleum.org](http://www.world-petroleum.org)

### SPAIN

UPI – [www.upienergia.es](http://www.upienergia.es)



## COMPANIES

### AUSTRIA

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

### CZECH REPUBLIC

EuroWag – [www.eurowag.com/?r=0](http://www.eurowag.com/?r=0)

### ESTONIA

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

### FINLAND

SEO – [www.seo.fi](http://www.seo.fi)

### GERMANY

ryd – [www.ryd.one](http://www.ryd.one)

### 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 Gelvybė – [www.facebook.com/gelvybe](http://www.facebook.com/gelvybe)

### 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)  
Global STAR – [www.enlazo.com](http://www.enlazo.com)

UPEI is a growing community of national associations and companies active in the independent energy and mobility supply sector across Europe. Together, our members represent a dynamic network of operators involved in energy distribution, mobility services, and innovative energy solutions, supplying transport energy and heat to customers across the continent.

Through UPEI, members exchange expertise, follow EU policy developments, and contribute collectively to shaping the EU regulatory environment affecting the sector. This collaboration enables independent energy suppliers to speak with a stronger voice in the European policy debate.

In 2025, UPEI was pleased to welcome new members, further expanding our network across Europe.

Among national associations, Union des Importateurs Indépendants Pétroliers (UIP) joined UPEI, representing the subsidiaries of supermarket chains supplying fuels in France. We also welcomed Polska Izba Paliw Płynnych (PiPP), the Polish Liquid Fuels Chamber of Commerce, representing more than 300 companies active in the Polish fuel market.

UPEI also strengthened its company membership with the arrival of ryd (formerly UPEI Business Partner) and Global Star, reflecting the increasing diversity of companies engaged in energy distribution, mobility services, and payment solutions.

As the European energy and mobility sector continues to evolve, UPEI would be delighted to welcome new members wishing to contribute to the dialogue shaping the future of energy and mobility in Europe.



# THE EU POLICY CONTEXT IN 2025

# THE EU POLICY CONTEXT IN 2025

In 2025, the European Union's energy and climate policy agenda evolved in a complex international and economic environment, where the pursuit of the EU's climate objectives increasingly crossed with concerns regarding economic competitiveness, energy security, and geopolitical instability.

The first full year of the second mandate of the European Commission, led by Ursula von der Leyen, took place in a context marked by several global developments influencing the EU policy debate. These included the continuation of the war in Ukraine, the growing economic and technological competition from China, and the new policy orientations emerging from the new United States Administration. Altogether, these elements contributed to a renewed discussion within the EU on how to reconcile the objectives of decarbonisation, of industrial competitiveness, and of security of supply.

While the EU maintained its long-term objective of achieving climate neutrality by 2050, the year was characterised by a more open reflection on the implementation of the European "Green Deal" and the need to ensure that the transition towards a low-carbon economy remains compatible with the EU's economic resilience and strategic autonomy.

## REVISION OF THE EUROPEAN CLIMATE LAW AND THE 2040 TARGET

A major institutional development in 2025 was the political agreement reached in December between the European Parliament and the EU Council on the revision of the "European Climate Law", introducing an intermediary target in 2040 of reducing greenhouse gas emissions by 90% (compared to 1990 levels).

This intermediary milestone aims to provide long-term visibility for investors and policymakers while confirming the EU trajectory towards climate neutrality by 2050. At the same time, discussions surrounding the 2040 target illustrated the growing importance of ensuring technological neutrality and preserving a diversified set of decarbonisation pathways.

Many stakeholders emphasised that reaching the EU climate objectives will require the mobilisation of multiple technologies and energy carriers, including renewable and low-carbon fuels, alongside electrification. In this respect, the debate on the 2040 target also marked the beginning of reflections on the future evolution of the legislative framework adopted under the "Fit for 55" package.

## COMPETITIVENESS AND THE IMPLEMENTATION OF THE GREEN DEAL

Another important dimension of the EU policy debate in 2025 concerned the competitiveness of the European economy. High energy costs, global competition for clean technologies, and concerns about industrial relocation led policymakers to place increased emphasis on ensuring that the implementation of climate policies does not undermine the EU's industrial base.

In this context, discussions within the EU institutions were increasingly focused on the need to complement climate policies with measures supporting industrial innovation, investment, and economic resilience. The objective has been to maintain the EU's leadership in the energy transition while preserving the competitiveness of European industries and avoiding distortions within the Internal Market.





Altogether, these discussions contributed to a partial re-assessment of certain aspects of the European "Green Deal", with policymakers seeking to strike a balance between maintaining climate ambition and creating a regulatory environment conducive to investment and growth.

## **CO<sub>2</sub> STANDARDS FOR ROAD TRANSPORT**

In December 2025, the European Commission presented a proposal to revise the Regulation on CO<sub>2</sub> emission standards for cars and vans. While maintaining the objective of decarbonising the transport sector, the proposal contained a timid opening towards a more technology-neutral approach, that will need to be confirmed and possibly amplified during the legislative discussions between the European Parliament and the EU Council.

## **ENERGY SECURITY AND GEOPOLITICAL DIMENSIONS**

Beyond climate policy and competitiveness, another theme gained particular importance in 2025, namely the security of energy supply. The geopolitical context, in particular the continuation of the war in Ukraine, reinforced the need to ensure resilient and diversified energy supply chains across the European Union.

Energy security was increasingly discussed in connection with broader strategic considerations, including the role of energy infrastructure in supporting Europe's defence capabilities and military mobility. Ensuring the availability of energy products throughout the EU territory and its close allies, including in crisis situations, therefore emerged as a growing priority for policymakers. The European Commission presented in November 2025 a "Military Mobility Package", proposing amongst others the creation of security corridors and the simplification of regulatory obstacles to the transport of troops across the EU.

In this context, the role played by independent energy and mobility suppliers attracted increasing attention from the policy-makers, given their contribution to the diversification of supply sources, the resilience of distribution networks, and the ability to deliver energy products where they are needed.

## **A SHIFT TOWARDS A MORE PRAGMATIC POLICY APPROACH**

Altogether, the developments observed in 2025 illustrate an evolution in the EU policy debate towards a more pragmatic approach to the energy transition. While the long-term objectives set by the European "Green Deal" remain unchanged, policymakers are increasingly emphasising the need to combine climate ambition with competitiveness, technological neutrality, and security of supply.

This evolving policy landscape will continue to shape the discussions in the coming years, as the EU prepares the next phase of its climate and energy framework and addresses the challenges associated with implementing the transition towards a sustainable, secure, and competitive energy system.

# UPEI AT A GLANCE



# UPEI AT A GLANCE

Across Europe, UPEI played a key role in highlighting the contribution of independent energy and mobility suppliers to competitive energy markets and resilient supply chains. In 2025, through advocacy, cooperation with stakeholders, and engagement with EU institutions, UPEI contributed to shaping policy discussions on energy security, competitiveness and the energy transition.

Our work focused on ensuring that the voice of independent energy and mobility suppliers is heard in the evolving European policy framework and energy debate.

## UPEI POLICY ENGAGEMENT 2025

22

**MEETINGS**  
with the European  
Institutions  
(experts' meetings,  
workshops, and bilateral  
meetings)



25

**MEETINGS**  
with stakeholders  
(stakeholders' meetings,  
workshops, conferences,  
and bilateral meetings)



97

**STAKEHOLDERS**  
we have interacted  
with directly or via  
informal coalitions

12



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

UPEI POLICY DIALOGUE & EVENTS

2025



**18 FEBRUARY**

14h - 22h

**UPEI & FETSA European Parliament Policy Event**  
"Advancing Europe's energy security, green transition and competitiveness: the role of liquid energy carriers"



**10 MARCH**

11h - 12h

**UPEI online event**  
Webinar "UPEI & Weber Shandwick EU Legislative and Regulatory Update"



**9 APRIL**

12h45 - 14h30

**UPEI commission event**  
UPEI Fuel Payments Commission Meeting (Ljubljana, Slovenia)



**9-11 APRIL**

**UPEI Statutory Meetings**  
UPEI Spring General Meeting 2025 (Ljubljana, Slovenia)



**13 JUNE**

11h - 12h

**UPEI online event**  
Webinar "UPEI & Weber Shandwick EU Legislative and Regulatory Update"



**17 JUNE**

11h45 - 17h

**UPEI commission event**  
UPEI Energy Transition Commission Meeting (Brussels, Belgium)



**3 SEPTEMBER**

10h30 - 12h

**UPEI online events**  
Workshop "EU 90% Target for 2040"



**17 SEPTEMBER**

14h - 15h

**UPEI online event**  
Webinar "Update on CEN TC19 Standardisation Activities"



**18 SEPTEMBER**

14h30 - 16h

**UPEI online event**  
Workshop "EU Affordable Housing Plan AND the EU Heating and Cooling Strategy"



**19-21 NOVEMBER**

**UPEI Statutory Meetings**  
UPEI Autumn General Meeting 2025 (Mechelen, Belgium)



**25 SEPTEMBER**

9h30 - 11h

**UPEI online event**  
Workshop "review of the Regulation on CO<sub>2</sub> emissions standards for new Light Duty Vehicles"



**19 SEPTEMBER**

11h - 12h

**UPEI online event**  
Webinar "UPEI & Weber Shandwick EU Legislative and Regulatory Update"



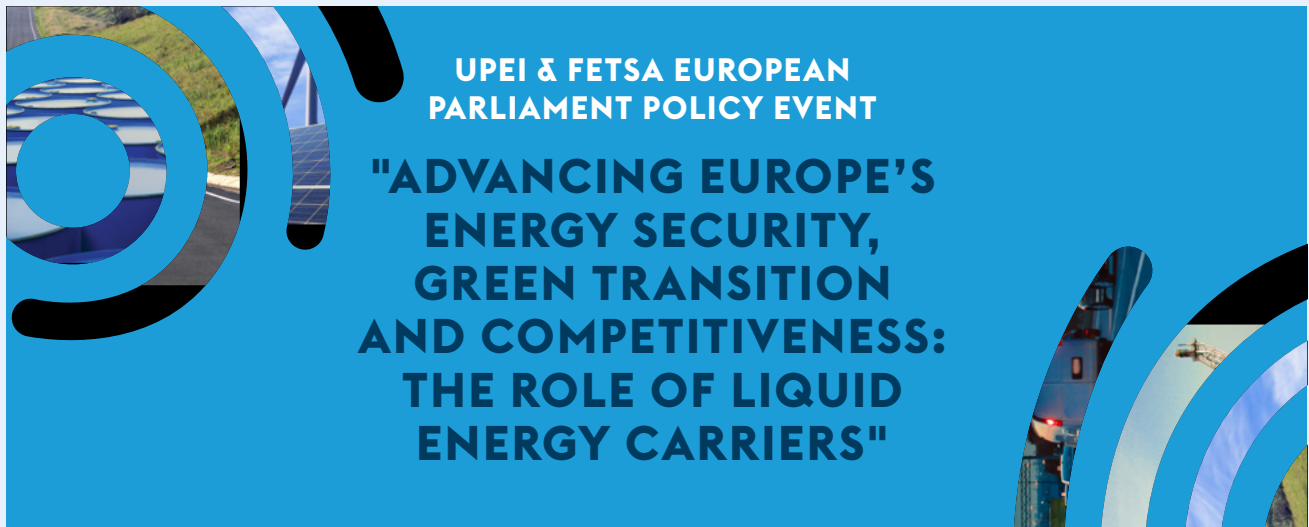
**2 DECEMBER**

11h - 12h

**UPEI online event**  
Webinar "UPEI & Weber Shandwick EU Legislative and Regulatory Update"

2026

# POLICY EVENT AT THE EUROPEAN PARLIAMENT



Within the framework of the "Energy for the Future" project (See more details on page 23, section "interacting with stakeholders, "Energy for the Future" project), UPEI and FETSA organised on 18 February 2025, a policy event at the European Parliament, bringing together representatives from the European institutions, industry stakeholders, and policy experts.

The event addressed several key themes currently shaping the EU energy policy debate.

The event was hosted by **MEP Michalis Hadjipantela (European People's Party, Cyprus)**, who opened the discussions with introductory remarks on the importance of dialogue between policymakers and industry stakeholders in shaping future EU energy policies.

The policy and regulatory perspective was provided by **Ms. Monika Zsigri, Head of Unit for Energy Security (ENER.B4)** at the **European Commission's Directorate-General for Energy**, who presented the Commission's approach to strengthening the EU framework for energy security, exploring the outlook for security of supply in the context of the EU's transition towards a sustainable and resilient energy system. Discussions highlighted the importance of maintaining diversified energy supply chains and robust infrastructure capable of ensuring the availability of energy products across the European Union.

A second topic focused on liquid energy carriers, climate goals and competitiveness. The debate examined the future role of liquid energy carriers in the EU's decarbon-

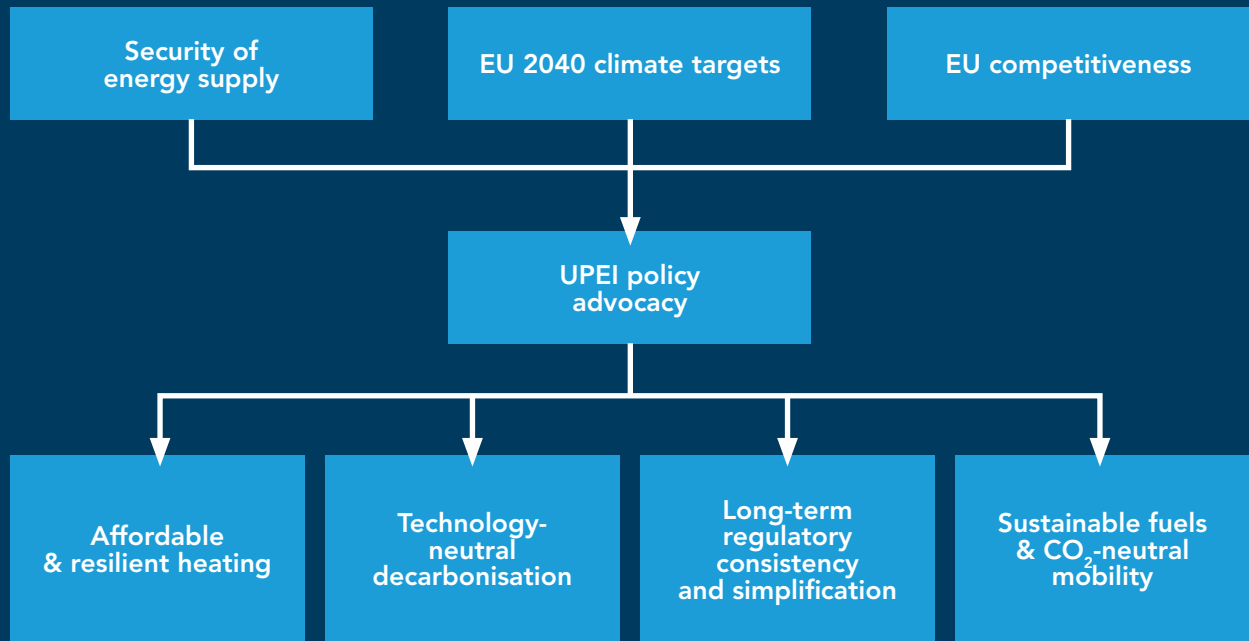
isation strategy and their contribution to achieving the climate objectives of the European "Green Deal" while preserving the competitiveness of European industry. **Johan Deleu, President of UPEI**, and **Bruno Hayem, President of FETSA**, highlighted the role played by the liquid fuels storage and independent distribution sectors in ensuring the resilience of Europe's energy supply system.

Participants also discussed the implementation of the "Fit for 55" legislative package, adopted during the previous EU mandate. Particular attention was given to the outlook for the revision of the "Energy Taxation Directive" (ETD), the evolution of the Regulation on CO<sub>2</sub> emission standards for light-duty vehicles, and the policy framework needed to incentivise the deployment of sustainable fuels.

The event concluded with a **question-and-answer session and open discussion**, moderated by **Luis Cervilla, Senior Vice President, Public Affairs, Weber Shandwick**, allowing participants to exchange views on the future role of liquid fuels infrastructure and independent energy suppliers within the evolving European energy landscape.

Through initiatives such as this policy event, UPEI continues to contribute to a constructive dialogue between industry stakeholders and EU institutions, highlighting the importance of secure energy supply chains and pragmatic policy solutions in the transition towards a sustainable energy system.

## SHAPING EU POLICY: CONTRIBUTING TO THE EUROPEAN ENERGY DEBATE



### KEY POLICIES

- » Security of Energy Supply
- » Technology-Neutral Decarbonisation
- » EU 2040 Climate Framework
- » Fair and Coherent Carbon Pricing
- » Affordable and Resilient Heating
- » Sustainable Fuels and CO<sub>2</sub>-Neutral Mobility
- » Competitiveness & Simplification



# UPEI PUBLICATIONS ISSUED IN 2025

## STATEMENTS

### FEBRUARY

- » [Joint Statement: Reality Check for European Hydrogen Policy to Adjust the Course](#)
- » [Joint Statement: Call for early technology-neutral review of the CO<sub>2</sub> emission standards regulations and incentives to stimulate uptake of clean vehicles by fleet owners](#)

### MARCH

- » [Call for action: Urgent need to recognise third country exports of gaseous fuels under the Union Database on biofuels](#)

### MAY

- » [Network For Sustainable Mobility calls for technology – neutral CO<sub>2</sub> Standards Regulations](#)

### JULY

- » [UPEI and FETSA welcome European Parliament's proposals to boost energy security and resilience in the EU](#)

### OCTOBER

- » [UPEI & FCE Joint Statement: Towards a coherent EU regulatory framework for fleet cards](#)

### NOVEMBER

- » [30<sup>th</sup> Conference of the Parties of the United Nations Framework Convention on Climate Change \(COP30\) in Belém, Brazil](#)

### DECEMBER

- » [Joint Heating Commission calls on EU Commissioners Jørgensen and Hoekstra to decouple the upcoming Heating and Cooling Strategy from the Electrification Plan](#)

## POSITION PAPERS

### FEBRUARY

- » [UPEI-FETSA: Position Paper on the upcoming proposal for an Omnibus Simplification Proposal](#)
- » [UPEI-FETSA Net-Zero Industry Act - Delegated Act on primarily used components under the Net-Zero Industry Act](#)
- » [UPEI-FETSA: Position paper on the Commission's upcoming Clean Industrial Deal](#)
- » [Proposals for Amendments to the report on the security of energy supply in the EU](#)
- » [Recommendations for the ITRE Committee's Own-Initiative report on Security of Energy Supply](#)
- » [UPEI's Position Paper on the Future of the Automotive Industry](#)

### MARCH

- » [Questionnaire on the Automotive Dialogue Consultation](#)

### MAY

- » [UPEI & FETSA: Recommendations for EU's architecture for Security of Energy Supply](#)

### JUNE

- » [Joint Heating Commission Response to the European Commission's Call for Evidence: European Affordable Housing Plan](#)

### JULY

- » [UPEI Position Paper on Military Mobility \(Answer to the targeted stakeholder consultation for the Military Mobility Package launched by the European Commission on 12 June\)](#)

### SEPTEMBER

- » [UPEI Answer to European Commission call for evidence on the Amendment Proposal to the European Climate Law \(2040 Target\)](#)

### OCTOBER

- » [UPEI Answer to European Commission call for evidence on the Revision of the Regulation setting CO<sub>2</sub> emission standards for new cars and vans](#)
- » [UPEI Position Paper on the implementation of the Emissions Trading System 2 \(ETS2\)](#)
- » [UPEI Position Paper on the revision of the Energy Taxation Directive \(ETD\)](#)
- » [UPEI Answer to European Commission call for evidence on the EU Heating and Cooling Strategy](#)

# ACTIVITY REPORT



# ACTIVITY REPORT

In 2025, UPEI continued to focus a large part of its activities on monitoring, reporting and advocating for our members towards the European Union (EU) institutions to ensure that our sector remains part of the carbon-neutral economy during the transition and beyond.

## UPEI GOVERNANCE

UPEI published its new Statutes, making official the enlarged scope of UPEI from independent "fuel" suppliers to "energy and mobility" suppliers, and redefining and clarifying the definitions of members and business partners within our association. Also, following discussions at the UPEI Spring General Meetings in Ljubljana (Slovenia) and in Rome (Italy), the UPEI Board agreed to move from a "commissions association" to a "topics association".

The commissions were phased out, following two final meetings.

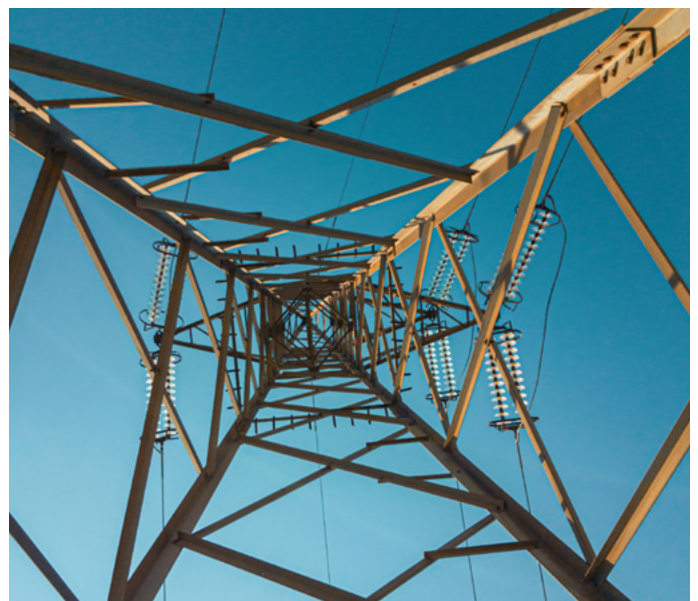
- » The Fuel Payment commission met in Ljubljana on 9 April 2025, allowing participants in the General Meeting to attend it. The meeting, chaired by Ondrej Jančařík (Eurowag) and discussed such topics as the European Commission's work programme for 2025 and strategic policy papers, notably the "fitness check on the energy security strategy", the on-going discussions (trilogues) between the European Parliament and the EU Council on the revision of the "Payment Services Directive" (PSD3) and the "Payment Services Regulation" (PSR), or the completion of the revision of the VAT Directives ("VAT in the Digital Age" - ViDA). The commission also reviewed the implementation at national level of the EU VAT Committee Guidelines on the application of the Vega International case.
- » The Energy Transition commission met in Brussels on 17 June, chaired by Christian Heise (DCC). Topics for discussion included an exchange of views with the managing director of FETSA (European fuel storage association) on the security of energy supply, and an internal debate on UPEI's positioning on this topic. The commission also held a discussion on the shifting of the EU energy and climate policy from sustainability to competitiveness and the consequences in terms of priorities for UPEI.

The decision to move to thematic workshops was motivated by the need to set up a more relevant, flexible, and agile UPEI: the model based on permanent commissions

was no longer adequate as EU policy and regulatory topics are more and more transversal and cover more than a commission's scope.

In this respect, each workshop would cover one topic and allow UPEI Members (and their members, warmly invited to attend) and Business Partners to better select if they want/can participate or not, instead of having to attend meetings with a full commission agenda. The workshops are meant:

- » To be output-oriented, aiming to the preparation of position and policy papers or of meetings with EU officials.
- » To cover topics that span over EU policy/regulatory and technology/industry topics, notably following the EU agenda; this includes new EU legislative initiatives, calls for evidence and public consultations from the European Commission, and in-depth look into technology-related issues.
- » To be of practical/operational nature or on strategic issues, within the scope of the EU energy, climate, transport and industry policies.
- » To be timely and clearly announced in terms of topic, agenda and expectations, so that UPEI members can designate the right experts as participants.



## UPEI WORKSHOPS

Based on this new model, three workshops were organised in the second half of 2025, on the following topics:

- » Revision of the "European Climate Law" (90% target for 2040): the objective was to provide an UPEI answer to the European Commission's public consultation related to a proposal for an amendment to the EU Regulation of 2021 establishing the framework for achieving climate neutrality. Based on a briefing note prepared by the Secretariat, the participants discussed the elements of UPEI's answer, that was then published and communicated to the European Commission officials. Its main message indicated that UPEI supports the setting of an intermediary target between those set for 2030 and 2050, as it helps create a unified legal framework for Member States and economic stakeholders, and that this target should be accompanied by an updated legislative architecture providing a coherent, stable, and forward-looking legislative framework, including the completion of the "Fit for 55" legislative package (ETD) and its implementing measures (notably the Union Database for Biofuels).
- » The "EU Affordable Housing Plan" and the "EU Heating and Cooling Strategy": participants discussed about the drafting of a UPEI contribution to public consultations organised by the European Commission. The outcome was summarised in a position paper and UPEI's more detailed answers to questionnaires. In terms of energy efficiency, UPEI pushes for speeding up of the replacement of obsolete and inefficient heating systems through financial and policy incentives. In terms of diversity of energy systems, UPEI proposes to promote and fund the installation of hybrid heating systems for most houses and to develop tools to improve their resilience against growing threats (diversity of sources and technologies, protection against physical or cyber-attacks). In terms of renewable fuels, a stable and enabling policy framework should be developed, that includes grants for research and innovation on renewable liquid fuels as a substantial long-term contribution to the reduction of carbon emissions from heating.
- » The review of the Regulation on CO<sub>2</sub> emissions standards for new Light Duty Vehicles (LDVs). The workshop provided for UPEI to prepare a position paper highlighting the following points: In terms of "evaluating the role of fuels, based on a technology-neutral

approach", the revised Regulation should include a) a technology-inclusive definition of CO<sub>2</sub> neutral fuels based on those of the "Renewable Energy Directive" and of the "Working Group on Monitoring Methodologies for CO<sub>2</sub>-Neutral Fuels" (WGMM); b) a Carbon Correction Factor that would represent the real CO<sub>2</sub> emissions of fuels, based on life-cycle methodologies, and a first important step to a more holistic climate policy in the European mobility sector; c) a new vehicle category exclusively powered by CO<sub>2</sub> neutral fuels, based on the report of the WGMM, which would put on equal footing all monitoring methodologies; and d) the use of the "well to wheel approach", instead of an approach exclusively based on tailpipe emissions.

The workshops were well attended and largely contributed to the drafting of UPEI's position papers and answers to the European Commission questionnaires. Building on this success, the Board agreed to continue organising them in 2026.

## UPEI WEBINARS

As initiated in 2024, UPEI continued organising quarterly updates on the EU policy, legislative and regulatory developments, prepared and presented by UPEI's public affairs consultant Weber Shandwick.

We also organised a specific webinar devoted to explaining UPEI's participation in the drafting of European standards. Ulrich Nowak (MEW), Managing Director of GMA-QM and representative of UPEI in the CEN TC 19, gave an overview of current standardisation activities in this technical committee, in particular on the revision of the diesel and gasoline standards. He also presented the new fuel labelling standard (EN 16942:2024) adopted in August 2024, prepared by the CEN TC 441.

## UPEI FORUM

UPEI Members and Business Partners made a large usage of the UPEI Forum, that serves as a powerful information tool. Most questions related to the implementation of EU legislation (RED, AFIR) or to compare specific pieces of legislation (protection of workers, introduction of HVO, development of renewables for heating fuel, use of mobile phones to pay at service stations).

# WORKING WITH EU INSTITUTIONS AND STAKEHOLDERS

## UPEI STAKEHOLDERS



UPEI & FETSA  
"ENERGY FOR THE FUTURE" PROJECT

NETWORK FOR SUSTAINABLE MOBILITY

MOBILITY FOR PROSPERITY  
IN EUROPE (MPE)

JOINT HEATING COMMISSION

INFORMAL COALITION ON DELEGATED  
ACTS ON RED II

CLEAN MARITIME FUELS PLATFORM

CEN TC/19 & CEN TC/441

## EU INSTITUTIONS WORKING GROUPS



FUEL CARDS STAKEHOLDER GROUP  
ON THE APPLICATION OF THE "VEGA  
INTERNATIONAL CASE" (DG TAXUD)

EUROPEAN CLEAN HYDROGEN  
ALLIANCE (DG GROW)

ETS2 STAKEHOLDER'S GROUP  
– EXTENDED TO COVER BUILDINGS  
AND TRANSPORT (DG CLIMA)

TRADE CONTACT GROUP (DG TRADE)

EXCISE CONTACT GROUP (DG TAXUD)

OIL COORDINATION GROUP (DG ENER)

RENEWABLE AND LOW CARBON FUELS  
VALUE CHAIN INDUSTRIAL ALLIANCE  
(DG MOVE)

## PARTICIPATING IN EU EXPERTS' GROUPS

In addition to its activities within industry coalitions, UPEI continued in 2025 to participate in several **European Commission expert groups**, which constitute an important channel for dialogue between policymakers and industry representatives.

These expert groups provide a forum for the European Commission (and Member States) to exchange technical expertise with stakeholders, to jointly monitor the implementation of EU legislation and to receive contributions to discussions on upcoming regulatory initiatives. Through its participation, UPEI ensures that the perspective of independent energy and mobility suppliers is reflected in the development and implementation of European policies affecting the downstream energy sector.

Among the groups in which UPEI remained actively involved is the **Excise Contact Group**, which discusses developments related to EU excise duties legislation. In 2025, discussions focused in particular on possible **simplification of excise procedures under Council Directive (EU) 2020/262**, as well as on practical aspects related to the application of excise rules across Member States.

Another important platform is the **ETS2 Stakeholders' Expert Group**, which supports the preparation and implementation of the extension of the "EU Emissions Trading System" (ETS2) to buildings and road transport.

UPEI also participated in several meetings of the **Oil Coordination Group**, organised by the European Commission's Directorate-General for Energy. In 2025, discussions notably addressed the future revision of the Oil Stocks Directive, in the framework of the expected impact of the decarbonisation target by 2040 and ongoing discussions on military mobility.

The **Trade Contact Group** met twice to discuss the EU customs reform as well as the issue of trade diversion, progress in the negotiations of a Free trade Agreement with India, and the "Carbon Border Adjustment Mechanism" (CBAM).

UPEI became involved with the new task force on Infrastructures created within the **"Renewable and Low Carbon Fuels Industry Alliance" (RLCF)**. The objective of the task force is to prepare a report on:

- » Infrastructure mapping & feedstock logistics ( Map all existing and planned assets and examine the mobility of feedstocks across the EU);
- » Assessment of gaps & needs (Identify where capacity, access, or resilience falls short of projected demand: technical limits, retrofitting potential, permitting hurdles, and supply-chain security);
- » Investment & roadmap (Analyse funding opportunities (EU/national programmes, private finance) and lay out a phased roadmap for closing the gaps and scaling infrastructure through 2030 and beyond.

The report should be finalised by end 2026.



## PARTICIPATING IN THE EU ENERGY POLICY COMMUNITY

### – ENGAGING EU POLICYMAKERS WITH OUR MEMBERS

In 2025, UPEI further strengthened its policy engagement by organising a series of **meetings between EU officials and UPEI Members**, enabling direct exchanges on key policy developments affecting the independent energy and mobility supply sector.

These meetings provide an opportunity for policymakers to **better understand the operational realities of independent suppliers across Europe**, while allowing UPEI and its members to present concrete examples from national markets and discuss the practical implications of EU legislation.

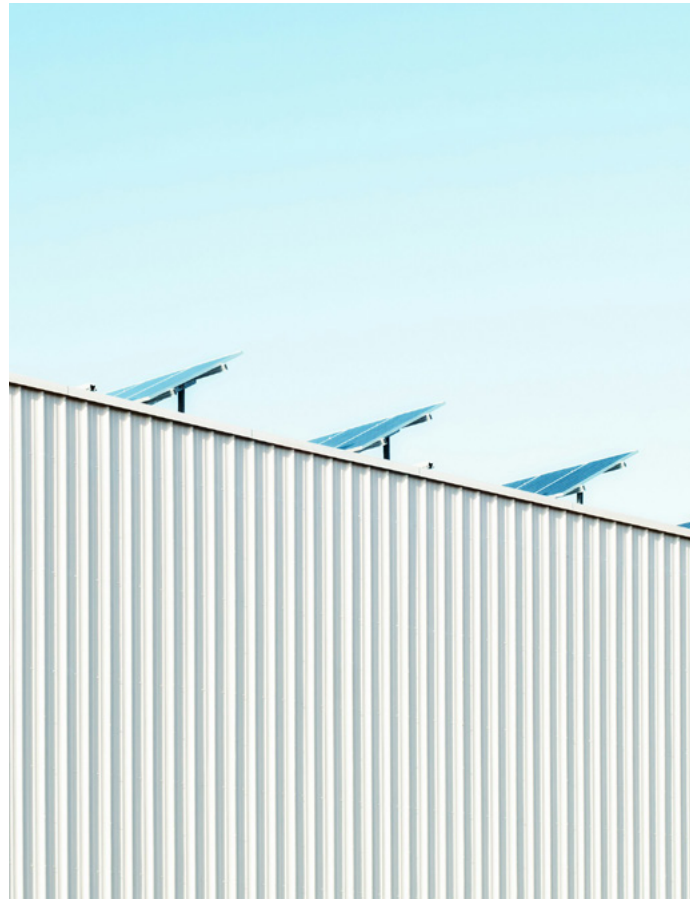
In particular, in March 2025, UPEI organised a visit to Brussels together with representatives of our Member **SEO**, including meetings with officials from the European Commission. The exchanges focused on the role of independent fuel distributors in ensuring **security of supply, regional connectivity, and the availability of energy services**, particularly in remote areas.

During the visit, discussions with officials from the European Commission's **Directorate-General for Energy (DG ENER)** addressed developments in the EU framework for energy security and preparedness. In particular, exchanges focused on the follow-up to the Commission's evaluation of the EU energy security architecture and the possible future revision of the **Oil Stocks Directive**, which establishes the EU system of strategic petroleum reserves.

UPEI and SEO also met with representatives of the European Commission's **Directorate-General for Mobility and Transport (DG MOVE)** to discuss the implementation of the **Alternative Fuels Infrastructure Regulation (AFIR)**. The discussion provided an opportunity to exchange views on the deployment of alternative fuel infrastructure across the European Union, including the development of recharging and refuelling networks along the TEN-T corridors and in urban nodes.

Also, our General Meetings provide opportunities to engage with EU officials:

» In Ljubljana, the President and the Secretariat of UPEI,

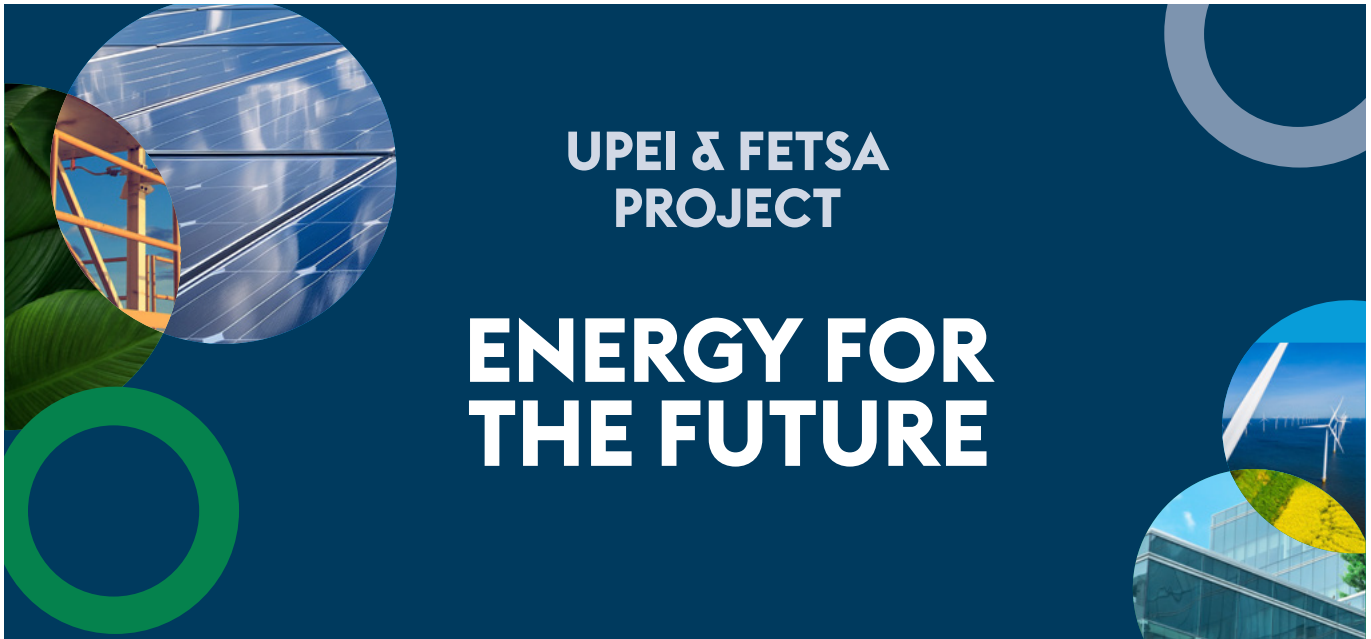


and the Secretary General of SNNK, met with Ms. Csilla Bartok, Head of Department, Gas, Hydrogen and Retail at the EU Agency for the Cooperation of Energy Regulators (ACER) to discuss the Agency's new role in shaping the deployment of the EU hydrogen infrastructure. Mr. Vassilis Papandreou, Policy Officer, Energy Hydrogen Markets, joined the General Meeting for a presentation and discussion on "EU hydrogen market developments".

» In Mechelen, Mr. Philippe Lamberts, Principal Adviser on Climate Policy to the President of the European Commission, made a presentation on "Challenges posed to the EU energy and climate policies" and held a debate with the UPEI members.

These exchanges illustrate the value of **bringing UPEI members directly into the European policy dialogue**, allowing policymakers to engage with industry representatives who operate across the entire energy distribution value chain. Through such initiatives, UPEI continues to strengthen the link between European policymaking and the operational experience of independent suppliers throughout Europe.

## – UPEI & FETSA "ENERGY FOR THE FUTURE PROJECT"



The "Energy for the Future" project, launched in 2022 by UPEI together with our partner association **FETSA (Federation of European Tank Storage Associations)**, with a full two-year financial support of MEW, continued its activities in 2025. The initiative aimed at strengthening the advocacy capacity of both associations towards the European institutions by joining forces and developing coordinated outreach actions.

The context in which the project operated has evolved significantly in recent years. The European Union is implementing an ambitious legislative agenda in the field of climate and energy policy, while at the same time facing growing geopolitical tensions and increasing global competition. In this environment, ensuring a secure, resilient, and competitive energy system has become a central priority of EU policymaking.

Against this backdrop, the "Energy for the Future" project promoted a constructive dialogue between EU policymakers and stakeholders of the liquid fuels storage and independent distribution sectors, highlighting the role these both sectors can play in ensuring both **energy security and the successful implementation of the energy transition**.

### – POLICY EVENT

A joint policy event was organised for UPEI and FETSA's respective members in the European Parliament in February (see above section "UPEI at a glance - impact report, page 15).

### – SECURITY OF SUPPLY

Via the project, a very close attention was paid to an "own initiative report" (INI) on Security of Supply prepared and adopted by the European Parliament. We visited the Rapporteur and all Shadow Rapporteurs or their assistants and were able to contribute to the Report's shaping, particularly regarding the role of fuel storage and distribution infrastructures in times of crisis.

We also paid visits to the Member States' Permanent Representations to contribute to the EU Council Conclusions on "strengthening the Energy Union through reinforcing energy security".

The "Energy for the Future" project was **successfully concluded at the end of 2025**, after three years of joint activities. UPEI would like to express its sincere appreciation to **our partner association, FETSA**, for the excellent cooperation throughout the project. We also warmly thank **our German member MEW**, whose financial support made the initiative possible.

This collaboration has demonstrated the value of joining forces between associations representing complementary segments of the energy value chain in order to contribute constructively to the European policy debate. FETSA and UPEI continue to cooperate on a more informal basis.

## CONTRIBUTING TO EUROPEAN STANDARDISATION

UPEI is represented as Liaison Organisation (without voting rights) in CEN/TC 19 (gaseous and liquid fuels, lubricants, and related products of petroleum, synthetic and biological origin) by **Ulrich Nowak** (MEW), and in CEN/TC441 (fuels labelling), by **Uta Weiss** (MEW).

## UPEI STAKEHOLDERS COALITIONS MEMBERSHIP

In 2025, UPEI continued to be actively involved in several industry coalitions and informal stakeholder groupings, which provide an important platform for exchanges between associations representing different segments of

the energy and mobility sectors. Such cooperation enables stakeholders to monitor legislative developments, exchange technical expertise, and coordinate advocacy efforts towards the European institutions.

Among these initiatives, UPEI remained engaged in the **Network for Sustainable Mobility**, led by CLEPA, which succeeded the former *Informal Coalition on Sustainable & Renewable Fuels* and established more structured governance arrangements. In 2025, the coalition worked on the **position paper on the revision of the Regulation on CO<sub>2</sub> emission standards for light-duty vehicles**, in view of the upcoming EU Automotive Package.

In the framework of the "**Mobility for Prosperity in Europe**" (MPE) group, UPEI also participated in exchanges with representatives of the rotating Presidencies of the Council of the European Union, as well as EU officials. In this context, meetings were organised with three transport attachés or deputy attachés representing the Belgian Presidency (Ms. **Audrey Devos**), the Hungarian Presidency (Ms. **Katalin Tari**), or the Polish Presidency (Mr. **Mateusz Urasinski**). Meetings with EU officials and Members of the European Parliament included Ms. **Petra Soderqvist**, (Policy Assistant at the Cabinet of Commissioner Tzitzikostas, in charge of Sustainable Transport and Tourism), Mr. **Jens Gieseke** (MEP, Vice-Coordinator TRAN Committee), and Ms. **Silke Brocks** (Head of Unit for Transport Networks at the European Commission (DG MOVE)).

UPEI also continued contributing to the work of the **Informal Coalition on Delegated Acts on RED II**, which meets on a bi-weekly basis to exchange views on current legislative developments and prepare common statements addressed to EU policymakers.

Finally, UPEI was involved with monitoring, within an ad hoc group, developments related to the **implementation of the VAT Guidelines following the Vega International Case**, which concerns the legal treatment of fuel card transactions. Exchanges with the European Commission and Member State representatives allow stakeholders to share experiences on the implementation of the guidelines at national level and to identify possible challenges faced by economic operators.

### – JOINT HEATING COMMISSION

UPEI continued contributing to the work of the Joint Heating Commission, created in 2019 together with **Eurofuel, FuelsEurope, and the European Confederation of Fuel Distributors (ECFD)**, with the objective of



developing coordinated advocacy activities towards the European institutions in the field of heating policies.

In this context, UPEI contributed to the dissemination and policy outreach related to the joint brochure "Heating with Liquid Fuels – Pathway for a Sustainable Future". The publication highlights the potential contribution of renewable liquid fuels, efficient heating technologies, and hybrid solutions to the decarbonisation of the heating sector while maintaining security of supply and affordability for consumers. UPEI also contributed to a common position paper ahead of the presentation of an "EU Affordable Housing Plan" by the European Commission.

– **WORKING GROUP ON MONITORING METHODOLOGIES FOR CO<sub>2</sub>-NEUTRAL FUELS (WGMM)**

UPEI also contributed, through our President **Johan Deleu** as member of the Steering Committee, to the work of the "Working Group on Monitoring Methodologies for CO<sub>2</sub>-Neutral Fuels" (WGMM), which gathers automotive industry representatives, equipment manufacturers, and fuel suppliers and distributors.

The objective of this initiative is to respond to a request from the European Commission to present technological options capable of demonstrating and monitoring the use of CO<sub>2</sub>-neutral fuels in new vehicles. The work carried out by the group aims to support the development of a methodology allowing the registration, after 2035, of vehicles operating exclusively on CO<sub>2</sub>-neutral fuels, in line with the commitments announced by the European Commission in the context of the EU regulatory framework for road transport.

In 2025, the WGMM focused its activities on the preparation of a report on the availability of renewable feedstock in Europe.

– **NEW MEMBERSHIP IN INFORMAL COALITIONS**

In 2025, UPEI also was admitted as observer in **the Clean Maritime Fuels Platform**, a dialogue initiative bringing together stakeholders in the shipping industry and fuel producers and distributors to facilitate the uptake of renewable and low-carbon fuels in the maritime sector. The first meeting attended by UPEI took place in November 2025 and focused on several regulatory developments affecting maritime fuels, including the implementation of the **FuelEU Maritime Regulation**, the review of the **EU Emissions Trading System for the mari-**

**time transport**, and the **transposition of the Renewable Energy Directive (RED)** at national level. Discussions also addressed the risks and opportunities associated with the deployment of new maritime fuels and explored possible joint advocacy activities for 2026.

UPEI was involved with the creation of a **Hydrogen Infrastructure Alliance**, an initiative bringing together European associations interested in the development of hydrogen infrastructure across the value chain. The initiative aims to facilitate exchanges between stakeholders and to develop common positions on EU policy initiatives affecting hydrogen infrastructure, including transport networks, storage facilities, import and export terminals and electrolysis capacity. The objective is to contribute to the development of a coherent European framework supporting the deployment of hydrogen as part of the future energy system.



# UPEI BUSINESS PARTNERSHIP

In the ongoing energy transition towards a more sustainable, resilient, and affordable energy sector, UPEI noticed how important it is for companies and fuel businesses of having a presence in Brussels with access to a broad range of expertise from within the independent energy sector as well as related sectors. In order to respond to this need, UPEI launched its Business Partnership (BP) in 2017, with the aim to bring together forward-thinking companies which are directly or indirectly involved in the fuel supply sector and which support UPEI mission. A clear definition of Business Partners, differentiating them from Members, was added to our revised UPEI statutes published in 2025.

In 2025, UPEI engaged with 13 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 BUSINESS PARTNER TESTIMONIAL: AVIA INTERNATIONAL



## AVIA – TECHNOLOGICAL OPENNESS SHOWN THROUGH INDEPENDENT ENERGY COMPANIES

The origins of the founding of AVIA date back to the year 1927. Since then, AVIA has grown steadily as an organization and is now represented by 90 independent member companies across the European continent. What makes AVIA unique is that it stands out from the competition in that it is not a corporate structure, but rather an association of medium-sized, family-run energy businesses. This decentralized structure enables entrepreneurial flexibility, strong regional roots, and a close connection to customers. When it comes to decarbonisation, AVIA serves as a striking example of how important technological openness is for establishing locally relevant offerings in the market:



The above-shown image presents green AVIA Hydrogen in Switzerland, produced from surplus electricity generated by Swiss hydroelectric plants. This represents one innovative pathway towards reducing emissions while using existing infrastructure.

More information on AVIA International on:

Follow Avia:

Furthermore, green electricity is produced by AVIA wind parks in Germany, which highlights another example of the commitment to renewable sources and sustainable power generation:



In addition, a range of products and services related to electric mobility is offered under the brand AVIA VOLT in the Netherlands, Germany, Switzerland and France:



Another method can be seen in the blending of renewable fuels, such as HVO or e-fuels. This will enable CO<sub>2</sub> emissions from internal combustion engines to be significantly reduced.

Together, these initiatives underline AVIA's pragmatic and technology open approach to the energy transition, combining innovation, local expertise, and a strong network of independent companies to deliver sustainable solutions across Europe.



## KEY BENEFITS OF MEMBERSHIP



### EUROPEAN REPRESENTATION

UPEI represents the interests of independent energy and mobility suppliers in Brussels, engaging with the **European Commission, Parliament, and Council** to ensure that the sector's perspective is reflected in EU policymaking.



### EARLY INTELLIGENCE ON EU POLICY

Members receive **timely updates and analysis of EU legislative and regulatory developments**, helping them anticipate policy changes and prepare for upcoming obligations.



### INFLUENCE ON EU DEVELOPMENTS

Members contribute to **UPEI position papers, consultation responses, and advocacy priorities**, helping shape the European policy debate on energy and mobility.



### GOVERNANCE AND DECISION-MAKING

Members participate in UPEI's governance structure and benefit from **voting rights at the General Meeting**, including the designation of Board members and strategic priorities.



### EXCLUSIVE EUROPEAN PEER NETWORK

UPEI offers access to a **trusted network of independent suppliers across Europe**, enabling exchange of expertise, best practices, and strategic discussions with industry peers.



### PLATFORM FOR EXPERTISE AND COLLABORATION

Members take part in **workshops, webinars, policy events, and working groups**, contributing expertise and strengthening the sector's collective voice in Europe.

**Together, UPEI members contribute to ensuring a competitive, sustainable and technology-open European energy future.**

# 2025

## UPEI ANNUAL REPORT

### CONTACT

Avenue de la Renaissance 1  
B-1000 Brussels

**Phone:** +32 2 740 20 20

 [info@upei.org](mailto:info@upei.org)

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