

Position paper

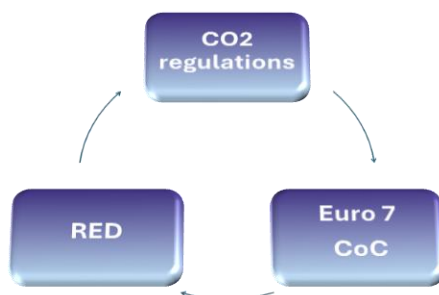
The [Tour d'Europe](#) is an initiative of the European automotive value chain that showcases the decarbonisation potential provided by renewable fuels, raise awareness about their availability in Europe, and underline their role in reaching the EU's objective of climate neutrality by 2050.

In 2025 a pan-European road trip featuring 16 cars and trucks powered by renewable fuels logged 82,800 kilometres across 18 countries in a real-world demonstration that these fuels deliver significant greenhouse-gas (GHG) reductions and should be a part of the EU drive to decarbonise transport. The vehicles refuelled 322 times with a variety of renewable fuels: HVO and B100 to power diesel engines, E85 and renewable gasoline to power petrol and hybrid engines, BioLNG for trucks running on gaseous fuels.

A digital end-to-end monitoring system was applied to collect and report well-to-wheel data on single vehicle level. This data and the digital monitoring system were analyzed by the Technical University of Darmstadt and the Karlsruhe Institute of Technology and summarized into a report, which concluded that "For the overall fuel mix of the Tour d'Europe, including standard fuel blends used during the Tour, the total GHG reduction reaches 77 %, showing a significant reduction in well-to-wheel CO_{2e} emissions with the given status of fuel availability. The renewable fuels (and their blends) by themselves achieved an average of 87% GHG reduction."

To unlock this important decarbonization potential, the group aims that the role of renewable fuels will be recognized and valued in the European legislation, especially in the upcoming review of the CO₂ regulation for cars and vans.

In general, the regulatory framework should be consistent. Each piece of legislation should rely on principles stated in other legislation without introducing multiple or conflicting criteria. To ensure this, the Renewable Energy Directive shall be the only reference act for the sustainability criteria and for the emission factors of renewable (eligible) fuels. The CO₂ regulations (for both light and heavy-duty vehicles) shall recognize the role of renewable fuels and properly account emissions of vehicles powered with renewable (eligible) fuels. Finally, Euro 7 and CoC regulations shall define the provisions for the test and for the approval of these vehicles.



To achieve this goal, the following modifications to the regulatory framework are needed:

1. Definition of a stable and reliable regulatory framework

Unlocking the potential of renewable fuels and attracting investment requires a clear, stable, and reliable EU regulatory framework. Scaling up these fuels is essential to meet the EU's decarbonisation goals. However, the current framework lacks strong regulatory signals to support

their full deployment, particularly in road transport. If the tailpipe approach is maintained despite its methodological limitations, then regulations on CO₂ standards for LDVs and HDVs, Euro 7, and CoC regulations should be revised accordingly.

2. Recognition of all RED compliant fuels as 'eligible fuels' (CO₂ regulation for cars and vans, as per Salini report)

All RED-compliant fuels should be recognised as “eligible fuels” under the CO₂ regulation, including for both the credit mechanism and VEEFs, by extending the scope of Article 5a and Articles 29 and 29a to cover all sustainable fuels listed in Annex IX (Parts A and B) of RED (EU) 2018/2001. The current scope is too restrictive, as it excludes key categories such as sustainable biomass fuels, recycled carbon fuels, and crop-based biofuels, thereby limiting the pool of eligible supply and failing to reflect both actual market availability and actual GHG saving potential.

3. Recognition of VEEFs as ZEV without any restriction/cap. This allows OEMs to further invest in decarbonisation of the ICE technology. (CO₂ regulation for cars and vans, as per Salini report)

A dedicated category for vehicles running exclusively on eligible fuels (VEEF) should be introduced under CO₂ regulations. These vehicles should be assigned a value of 0 gCO₂/km and recognised as zero-emission vehicles (ZEV), without any caps or restrictions, to fully reflect their decarbonisation potential. This category should result directly from the implementation of Recital 11 of Regulation (EU) 2023/851, which commits the Commission to establish a category for vehicles running exclusively on CO₂-neutral fuels. The regulation should further define the essential elements of the approval framework, including their classification as ZEV and the establishment of robust monitoring methodologies. Recognising and enabling these vehicles immediately is essential to ensure technological neutrality, foster innovation, and support manufacturers' emission targets.

4. VEEF - Introduction of flexible monitoring methodologies, suitable for liquid and gaseous fuels.

This new dedicated category of vehicles running exclusively on eligible fuels (VEEF) shall be equipped with a fuelling monitor, to ensure the use of eligible fuels. The CO₂ regulation for cars and vans shall define the basic principles for this monitor, such as:

- The capability of identifying, during vehicle operation and at each fuelling event, whether the vehicle is operated exclusively on eligible fuels.
- The protection against tampering
- The possibility to use physical, chemical, virtual, mass balancing, digital identification / validation or any other technically suitable tracking method
- The requirement of marking or labelling in an appropriate manner the fuel inlet indicating that the engine is operating exclusively on eligible fuels.
- Provisions for vehicles travelling outside Europe. The monitoring methodology should be active only within the territory of the European Union while ensuring robust monitoring of import quantities from non-EU countries.

Detailed requirements could be specified in a dedicated Euro 7 secondary legislative act.

In this regard, it's important to note that [WGMM](#) in 2024 released a report describing 11 methodologies covering both physical and virtual (mass balancing) fuel tracking from the production to the use phase.

5. VEEF - Introduction of reasonable inducement system.

VEEF shall also be equipped with an inducement system, with the goal to alert the user in case of unavailability of renewable (eligible) fuels. In a similar way, the CO₂ regulation shall define its basic principle to limit vehicle operation in terms of time, mileage or performance. In other words, the inducement system of the vehicle should be activated until restoring correct refuelling operation. For safety reasons, the vehicle must not stop immediately; in this regard, the regulation should provide a certain degree of flexibility. WGMM has identified several inducement system possibilities, some of which are already adopted in heavy duty regulations.

6. Definition of rules to assign fuel consumption and zero CO₂ value to vehicle

VEEFs shall be clearly identified as ZEV, and the certificate of conformity (CoC) of the vehicle should report zero CO₂ emissions. This will allow vehicle manufacturers to reduce their fleet average CO₂ emissions and to comply with CO₂ target reduction requirements when providing vehicles helping to accelerate decarbonisation. The measured CO₂ value should be only used for the calculation of the fuel consumption figure. All these provisions shall be defined in Euro 7 regulation and/or in the CoC regulation.

More information on vehicles running exclusively with eligible fuels can be found in our Q&A online document ([link](#) & [QR code](#)).