



Brussels, November 25 2022

Subject: GHG accounting methodology for recycled carbon fuels

Dear Permanent Representative,
Dear ENVI and ITRE rapporteurs and shadow rapporteurs,

On the 14th of December, the third trilogue on the Renewable Energy Directive (RED III) will be held to discuss the transport and industry targets, and especially the new article 29 (a) on greenhouse gas emissions saving criteria for renewable fuels of non-biological origin and recycled carbon fuels (RCF).

Despite of their fossil origin, RCFs are still to be considered in the REDII. To ensure that only low-carbon fuels contribute to transport targets, the undersigned associations call on the co-negotiators to set at least 70% greenhouse gas (GHG) emissions savings criteria compared to fossil fuels (the same threshold is applied for Renewable Fuels of Non-Biological Origin).

In addition, the methodology for GHG should ensure that all of the emissions related to these fuels are taken into account, the GHG accounting must cover the embedded carbon of the product. This includes emissions related to energy inputs, production, and to the use or combustion of the fuel. Indeed limiting the methodology to the production phase would seriously reduce its scope as the carbon content of the waste represents the majority of emissions related to RCFs.¹ A methodology with a reduced scope would allow to define as low carbon fuel one with a high environmental impact.

We are therefore recommending the **inclusion of the carbon content of waste, also called embedded carbon, in the methodology to assess GHG emissions of RCF in the article 29 (a) 3. of the RED.**

We thank you for taking the views expressed in this letter into consideration, and remain at your disposal for any further assistance.

Yours sincerely,

The undersigned organisation (in alphabetical order)

Bellona
ECOS
European Environmental Bureau
Polish Zero Waste Association
Transport & Environment
Zero Waste Europe

¹ Zero Waste Europe, [Making GHG accounting work for climate – recommendations for accounting methodology for Recycled Carbon Fuels](#), 2020



Article 1, first paragraph, point (19), amending provision, numbered paragraph (3)

300	<p>3. The Commission is empowered to adopt delegated acts in accordance with Article 35 to supplement this Directive by specifying the methodology for assessing greenhouse gas emissions savings from renewable fuels of non-biological origin and from recycled carbon fuels. The methodology shall ensure that credit for avoided emissions is not given for CO₂ the capture of which has already received an emission credit under other provisions of law.;</p>	<p>3. The Commission is empowered to adopt delegated acts in accordance with Article 35 to supplement this Directive by specifying the methodology for assessing greenhouse gas emissions savings from renewable fuels of non-biological origin and from recycled carbon fuels. The methodology shall ensure that credit for avoided emissions is not given for CO₂ the capture of which has already received an emission credit under other provisions of law. <u><i>The carbon content of the wastes and their release to the atmosphere shall be included in the methodology.</i></u></p>	<p>3. The Commission is empowered to shall adopt delegated acts in accordance with Article 35 to supplement this Directive by specifying the methodology for assessing greenhouse gas emissions savings from renewable fuels of non-biological origin and from recycled carbon fuels. The methodology shall ensure that credit for avoided emissions is not given for CO₂ the capture of which has already received an emission credit under other provisions of law. The methodology shall cover the life-cycle GHG emissions that must include indirect emissions.</p>
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Article 1, first paragraph, point (19a), introductory part

300a		<p><u><i>In any event, the methodology for assessing greenhouse gas emissions savings from recycled carbon fuels shall consider, in a life-cycle approach, the embedded carbon.</i></u>;</p>	
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