

LPG industry position paper on the proposal for a Council Directive on the implementation of Art. 7 of the Fuel Quality Directive

AEGPL, the European LPG Association, wishes to reiterate its strong support for the European Union's attempt to reduce GHG emissions from the transport fuels sector. It also commends the milestone recently reached through the release of the proposal for a Council Directive on the implementation of article 7 of the Fuel Quality Directive.

More specifically:

- **AEGPL welcomes the Commission's attempt to limit the administrative burden linked to reporting,** especially for small and medium enterprises. The use of a weighted average provides a very simple – yet scientifically robust - method by which a sufficiently accurate assessment of the emissions can be made. Furthermore, including the possibility to report by applying additional or alternative data collected pursuant to other Union or national legislation adds flexibility. In this regard AEGPL hopes Member States will keep in mind this important element of “red-tape-cutting” when transposing this Directive. This element holds particular importance for companies distributing primarily fuels with lower carbon intensities than the baseline.
- **AEGPL also supports the innovative idea to permit pooling of emissions from several companies** as well as averaging and joint assessment of emissions of different portfolios. This, in combination with other recent legislative initiatives such as the Directive on Alternative Fuels Infrastructure, will clearly foster diversification and a corresponding reduction in the carbon intensity of the transport fuel mix. LPG, as a fuel with a lower carbon intensity than most other fuels, can contribute positively to the average carbon intensity of many companies' portfolio on the average emissions of the different fuel portfolios.

- Concerning the lifecycle carbon intensity values assigned to the fuels covered by the proposal, **AEGPL supports the value for LPG given in Annex II of the Directive of 73,6 gCO₂/MJ**. When read in the context of the values assigned to conventional fuels (93,3 and 95,1 gCO₂/MJ for petrol and diesel respectively), AEGPL would like to further point out the immediate benefits of wider use of LPG, especially in light of the extensive LPG infrastructure that is in place across much of the Union. Furthermore, it should be noted that the 73,6 gCO₂/MJ value does not include the emergence of bio-propane, which would reduce this value further.
- **AEGPL does however regret that the Directive – as recently announced by the Commission – is not expected to extend beyond 2020**, as we believe it would have a more powerful long-term effect which could yield even greater GHG emissions savings if it were to do so. This is in particular in light of the long lead time associated with investments in the transport fuel sector.

For further enquiries on this topic, please contact AEGPL's Autogas Manager, Alexander Stöhr at alexander.stoehr@aegpl.be or AEGPL's General Manager, Samuel Maubanc, at samuel.maubanc@aegpl.be

About Autogas – Automotive LPG

Automotive LPG, commonly known as Autogas, is Europe's and the world's leading alternative fuel. It powers 7.4 million vehicles across the European Union serviced by over 30,000 filling stations. As a clean burning and lower-carbon fuel, it has led to the saving of millions of tonnes of CO₂ and improved air quality, when used in place of conventional fuels. According to TM Leuven, a tripling of the amount of Autogas used in the EU's passenger car fuel mix by 2020 would lead to further savings of 274 million tonnes of CO₂, among other benefits.

About AEGPL (The European LPG Association)

AEGPL is the sole representative of the LPG industry at European level, representing national LPG Associations as well as distributors and equipment manufacturers from across Europe. Our mission is to engage with EU decision-makers and the wider policy community in order to optimise the contribution that LPG - as a clean and immediately available energy source - can make to meeting Europe's energy and environmental challenges