

## Revision of the Renewable Energy Directive (RED III)

### Joint UPEI-FETSA position

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UPEI, Europe's independent fuel suppliers, and FETSA, Federation of European Tank Storage Associations, have carefully reviewed the European Commission's [Proposal to amend the Renewable Energy Directive \(RED III\)](#). RED III represents a key element of the "Fit for 55" Package and the current geopolitical context further enhances its importance.

In defining their position on this dossier, we believe that lawmakers should aim to encourage the greater use of renewables, including through ambitious sub-targets, and address some unjustified restrictions.

Ahead of the vote in the ENVI Committee, we therefore urge MEPs to support the following amendments.

#### Joint recommendations on RED III Amendments (AMs)

We believe that the **GHG intensity reduction target in the transport sector should be increased**, provided that it is supported by **higher shares of sustainable biofuels, synthetic fuels and other low-carbon fuels**.

In this regard, the consideration of the role of **low-carbon energy sources** also represents a positive step. Among other benefits, low carbon fuels are based on already mature and reliable technologies and can take advantage of existing infrastructure.

In the same spirit, we believe that **RED III should not unduly restrict the use of sustainable food and feed crop-based biofuels**, as long as all sustainability criteria are met. Since the 2018 Directive already provides with measures to guarantee that high-ILUC-risk biofuels are not taken into consideration for the calculation of the renewable energy targets, sustainable fuels (such as crop-based biofuels with proven sustainability credentials) should be accounted for.

We therefore ask you to **support AMs 572, 576, 578, 579, 580, 582, 583, 584**.

A higher level of ambition requires access to a wide range of feedstocks. We therefore urge legislators to **lift the cap on the use of Annex IX, Part B feedstocks**. In line with this approach, we also welcome efforts to ensure that, should the cap be maintained, it would be accompanied by a greater degree of flexibility.

We recommend **supporting AMs 624 and 625**.

#### About UPEI

[UPEI](#) represents nearly 2,000 European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe's customers independently of the major energy producers.

They are the interface between producers and consumers, using their own infrastructure and flexibility to supply existing demand for conventional and renewable liquid fuels, as well as non-liquid alternatives as part of the energy transition. They cover more than a third of Europe's current demand. The organisation brings together national associations and suppliers across Europe.

Independent fuel suppliers bring competition to Europe's energy market and are able to respond rapidly to changes affecting supply, contributing to security on a local, national and regional level. They have developed and maintain a comprehensive infrastructure for the sourcing, storage and distribution of transport and heating fuels, with a commitment to delivering a high-quality service to all consumers, including those in remote areas.

### **About FETSA**

Members of [FETSA](#) are businesses engaged in bulk storage and energy infrastructure across Europe. Bulk liquid and liquified gas terminals are present in ports, airports, logistics platforms and along rivers, canals and pipelines. In total FETSA represents 141 companies operating 743 terminals across Europe.

These tank storage terminals provide an essential interface between sea, road, rail, inland waterways and pipeline logistics. They are critical links in the supply chain for energy carriers, chemicals, animal feeds and fats, oils and other substances, helping to balance out supply and demand and ensure companies and consumers have access to these products.

Many tank storage terminals are designated as Critical National Infrastructure by the EU and national governments due to their importance in providing energy to society. The storage capacity represented by FETSA also includes strategic reserves held for emergencies (such as NATO stocks and IEA mandated reserves) and supply disruptions.