

## NET-ZERO INDUSTRY ACT –DELEGATED ACT ON PRIMARILY USED COMPONENTS UNDER THE NET-ZERO INDUSTRY ACT

### Response to the Public Consultation by UPEI-FETSA

February 2025

UPEI, the voice of Europe's independent fuel suppliers, and FETSA, the Federation of European Tank Storage Associations, welcome the publication of the Commission's [proposal](#) for a Delegated Act defining the components primarily used for the production of the final products listed as net-zero technologies in the Net-Zero Industry Act (NZIA).

UPEI and FETSA strongly support the aim of the Net-Zero Industry Act to create enabling conditions for technologies that are critical to Europe's decarbonization.

In this respect, we appreciate the Commission's proposed expansion of the Annex, with the aim to define the components of net-zero technologies in the scope of the NZIA. We believe that the further definition of the final products and components of such technologies will be critical to fully implement the NZIA harmoniously across Member States, truly enabling the deployment of critical decarbonization technologies. In this regard, it is critical that liquid energy carriers are thoroughly considered within this legal framework, to ensure they can continue to contribute to the green transition, while benefitting from enabling conditions that will be particularly necessary for independent fuel suppliers.

With this in mind, UPEI and FETSA would like to propose some further additions to the Annex:

- **Energy storage technologies and liquified/compressed gas energy storage technologies:** UPEI and FETSA commend the Commission for its inclusion of energy storage technologies as part of the sub-category. We believe that, in this context, further clarification should be given to energy storage technologies, by adding components such as air liquifiers, cryogenic tanks, compressors and pumps, heat exchangers and expansion turbines. In addition, with regards to final products, we recommend a specification to cover particularly energy storage technologies in terminals designated, or with the capacity to act as, critical infrastructure, for instance strategic stockpiling and reserves.
- **Sustainable Alternative Fuels technologies:** The current delegated act only contains SAF plants as final products, and in accordance, also contains only those components relevant to plants. UPEI and FETSA strongly recommend that the Commission expand this, to also include SAF storage and distribution to the key final products and components accordingly, as well as processes such as product purification and conditioning, intermediate storage and mixing as well as intermodal

services (i.e. injection in the pipeline). By expanding this category to include the aforementioned, the Commission would ensure complete supply chain integration, and avoid bottlenecks in the supply chain. In addition, existing infrastructure will need adaptations to distribute SAF efficiently and cost-effectively, where the NZIA provisions could help support such developments. Moreover, such additions would further support the economic case of SAF technology development, as they would ensure further market accessibility, efficiency, and the overall incentivization of the SAF ecosystem – further assisting the EU to meet its SAF production and blending mandates as required by the “Fit for 55” package.

- **Hydrogen technologies:** UPEI and FETSA commend the Commission for including storage and distribution as a final product. To further create enabling conditions for the hydrogen sector, we recommend expanding the list of components to include hydrogen carriers, derivatives and conversion-related activities, to ensure a comprehensive incentivization of the hydrogen value chain.
- **Renewable fuels of non-biological origin (RFNBO) technologies:** Similarly to the issue of SAF, UPEI and FETSA would also like to recommend that the Commission expands the Annex to go beyond RFNBO plants, and extend it to storage and distribution technologies. Reaching the EU’s Fit for 55 goals will require robust midstream infrastructure, to enable wider RFNBO deployment. By ensuring holistic support for the entire supply chain, the EU would ensure a balanced supply and demand, and enhance the EU’s energy security infrastructure.
- **CCS technologies:** carbon final storage (e.g. subsea sinks) and carbon intermediate storage (e.g. intermediate hubs) should be part of the technology sub-category, while product purification, intermediate storage and mixing, product conditioning and intermodal services should be integrated as key components. These additions are critical to ensuring a robust value chain, easier permitting with a view to faster deployment of CCS technologies, to allow them to contribute Europe’s net-zero goals.

In conclusion, a comprehensive consideration of the aforementioned aspects within the Annex of the Net-Zero Industry Act will play a pivotal role in enhancing the competitiveness of Europe’s energy sector. UPEI and FETSA reaffirm their support for the overarching objective of strengthening the competitiveness of Europe’s net-zero industry as it transitions toward climate neutrality by fostering more favourable conditions for growth and innovation. By expanding the Annex as recommended, the EU can provide the regulatory certainty and investment incentives necessary to empower a sector that is instrumental in driving forward the green transition.

UPEI and FETSA stand ready to provide further support to the European Commission’s critical work.

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