















Brussels, 2 February 2015

To: All commissioners

Re: Electrification of transport within the European Energy Union communication

Dear Commissioner,

We write to you with regard to the upcoming Communication on the European Energy Union with a forward-looking climate policy that you are currently discussing. We hope that you can pay special attention to the decarbonisation of transport and include a comprehensive strategy for electrification of transport as one of your priorities for moving Europe further down the road of climate and energy security and towards reducing its global land foot-print.

In recent years Europe has spent around 300 billion EUR annually on oil imports, more than two-thirds of which went to powering a European transport system that is 95% dependent on oil. Even with current low global oil prices, there is a convincing case for reducing our oil imports as they make Europe dependent on unstable regions (a third of oil comes from Russia and another third from the Middle East), lead to transport being the single biggest emitter of carbon emissions (in 2012 greenhouse gas from transport, including aviation and shipping, amounted to 31% of overall GHG emissions) and make our economy sensitive to oil price volatility.

In line with our international climate obligations and according to the Commission's white paper on transport, Europe will have to cut emissions from transport by almost 70% from today's levels by 2050 – a 3% reduction per year. Improving vehicle efficiency is one key mechanism to deliver these cuts. It should be further strengthened by introducing ambitious CO2 standards for cars and vans in 2025 and developing standards for trucks as soon as possible. But these standards must be complemented with a comprehensive strategy for sustainable e-mobility.

Europe has long favoured 'technology neutrality' in its attempts to reduce energy use and CO2 emissions from transport. But technology neutrality has failed, as the institutions are unable to include the correct carbon accounting for different types of fuels in the Renewable Energy and

Fuel Quality Directives. Due to significant resistance from both the oil industry to accept the greenhouse gas values for different types of fossil fuels (tar sands, oil shale, etc) and the biofuel industry to accept indirect land-use change (ILUC) emissions in the carbon accounting of different biofuels, we are left with a system that fails to encourage different types of fuels based on their performance. Beyond carbon emissions, indirect land-use change is a major driver of land grabs and human rights violations in Southern countries, in contradiction with the Policy Coherence for Development principle. With this in mind, the Commission should not put in place any new targets or support systems for land-based biofuels after 2020.

While the oil industry is investing in ever dirtier and more risky oil (offshore drilling, tar sands and arctic oil) and while the biofuels policy has failed, leading to increased food prices and deforestation, electricity is on a clear path to decarbonisation with around 70% of additional generation capacity consisting of solar and wind power. Electrification of transport can complement these efforts by serving as a storage option, stabilising the grid and balancing the demand. In addition, electric mobility can also reinforce trends towards more sustainable transport, as it is very well suited for inter-modality with rail, car-sharing and smaller vehicles in urban transport.

An electrification strategy, based on the use of renewable energies like wind and solar, within the Energy Union is a bold and appealing vision in moving away from polluting, imported oil to clean domestically-generated electricity, while at the same time stimulating jobs, growth and sustainable mobility choices. Electric vehicles have an important role to play in the stabilisation and security of the pan-European grid, allowing the use of more renewable energies sources over time and EU-level demand-side management.

As the energy union takes shape, the Commission can now take the chance to strengthen its role in realising these objectives. Electric mobility has been identified as priority area by the October 2014 European Council and for the European Industrial Renaissance, and has already been the focus of almost a dozen DGs and other EU bodies. Now it is time to focus these efforts by confirming its role as a flagship political priority within the Energy Union.

We thank you for taking these views into account in your discussions and remain at your disposal for any additional information.

Yours sincerely,

Jos Dings, Director

Transport & Environment

On behalf of:

Jeremy Waites, Secretary General, European Environmental

Bureau

Angelo Caserta, Director, BirdLife Europe

Laura Sullivan, EU Advocacy Coordinator, ActionAid

Jason Anderson, Head of European Climate and Energy

Policy, WWF

Nick Mabey, CEO, E3G

Laura Degallaix, Director, ECOS

Magda Stoczkiewitz, Director, Friends of the Earth Europe