

Contribution to the consultation of the European Commission regarding

Net Zero Industry Act (COM(2023) 161 final)

27 June 2023

DVF welcomes the proposal of the Net Zero Industry Act (NZIA).

DVF fully supports the European Green Deal goals. The transformation of mobility urgently requires clean energy, new propulsion systems, alternative fuels and infrastructure. Global competition for investments in clean technologies is quickly increasing. The EU needs an effective and immediate answer to these challenges. We think that the NZIA can contribute to achieving this aim.

However, several elements important for the swift and successful transformation of the transport sector are missing in the list of strategic net-zero technologies. This applies in particular to clean fuels for aviation (SAF), to e-fuels and liquified hydrogen for transport purposes in general, and to the aspect of carbon dioxide utilisation.

DVF welcomes the inclusion of the following subjects in the basic definition of net-zero technologies, article 3:

- sustainable alternative fuels technologies
- renewable fuels of non-biological origin technologies (e-fuels)
- electrolyzers, fuel cell technologies
- renewable energy technologies, batteries and storage technologies, grid technologies
- carbon capture, utilisation, and storage technologies
- energy-system related energy efficiency technologies

DVF asks to add the following point in the definition of net-zero technologies:

- liquid hydrogen technologies

DVF asks to add the following points to the strategic net zero technologies, annex to article 10:

- RFNBO (e-fuels)
- sustainable aviation fuels (SAF)
- liquid hydrogen technologies
- Carbon Capture *and Utilisation* (CCU)

If these points are omitted the EU risks that clean tech investments fail to appear and European carriers will not be sufficiently supplied with clean fuels – volumes remaining too low and prices too high. This would degrade CO₂ mitigation and weaken the carriers' competitiveness, e. g. in air transport compared to the U.S. or the Gulf region.

DVF also recommends to use instruments that directly support clean fuels and cover the price gap between fossil and alternative fuels, in a simple way similar to the U.S. IRA.

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