

**UPEI CONTRIBUTION TO
EUROPEAN COMMISSION CALL FOR EVIDENCE
“SETTING A RENEWABLE ENERGY FRAMEWORK FOR THE DECADE AHEAD”.**

Brussels, 16 April 2026

UPEI, the voice of Europe's independent energy and mobility suppliers, has carefully read the call for evidence, published on 19 March 2026, inviting for an input on “setting a renewable Energy Framework for the decade ahead”. We will focus our input on the review and possible revision of RED III (EU) – (Directive 2023/2413), as we see it as the main pillar of the EU policy on renewables.

This is a preliminary answer, as the timing chosen (middle of one of the most acute crises faced by our sector since 1973) and the timeline (four weeks) did not give us much time to prepare more arguments. We will attempt to provide a more detailed answer to the public consultation before 12 June.

Building on our previous position papers, notably on the call for evidence on the Amendment Proposal to the European Climate Law and on the future revision of the Energy Union Governance Regulation, UPEI proposes considering the next points, constantly keeping the link between ambition, market reality, and investment conditions:

The revision should aim at:

1. Providing a coherent, stable, and forward-looking legislative framework.
2. Amending current legislation only to the extent that it is necessary to implement the revised European Climate Law's intermediary target of 90% by 2040.
3. Promoting an honest and full implementation of the technology neutrality principle, notably as regards infrastructure planning, methodological choices (e.g. primary energy factors), and regulatory design.
4. Combining policy ambition and practical achievability, considering the availability of renewable fuels, infrastructure constraints, technology maturity and realistic scaling times.
5. Considering flexibility mechanisms to address temporary imbalances between targets and market realities.
6. Building a diversified and resilient energy system that addresses the short, medium, and long-term geopolitical dimension by strengthening the role of renewable fuels, including liquid fuels, for resilience and security of supply.

Furthermore, the European Commission should:

7. Base the revision on a proper evaluation of the RED III implementation at national level, which as such is a major issue since not all Member States have transposed the

Directive in national legislation. In this context, EU-level. In this context, EU-level targets must be translated into national implementation instruments, in order to avoid market distortions, inefficient allocation of renewable fuels and infrastructure, and barriers to trade inside the EU internal market, as we see happening now both in land and in the maritime sector.

8. Integrate in the preparations for the revision an overall analysis of the energy security of supply for Europe, not only considering the current energy crisis but also the specific needs of critical sectors (military, security and safety, health).
9. Abandon the idea that biomass might become scarce for bioenergy: very recent studies demonstrate the contrary, such as "[The availability of sustainable feedstocks for the production of CO2-neutral fuels in Europe](#)", "[Sustainable bio feedstock supply chains for advanced biofuels in Europe towards 2050](#)", or "[From raw material to fossil-free mobility: Europe's potential for a renewable fuel market](#)".
10. Promote innovation and competitiveness of all renewables, including advanced biofuels and RFNBOs, by considering them as viable solutions for the carbon neutrality targets, at the same level as electrification.
 - There are technological pathways allowing for efficient resource use and mitigating concerns about competition between food and fuels. Their development needs to be further encouraged.
 - To be able to scale up, companies in the UPEI sector need an open market, which requires freedom to provide all renewables to all means of transport (including road) and heating.
 - Electrification cannot be seen as the only solution, and overall costs and bottlenecks to sustainable electrification should also be fully assessed and included into policymaking.
11. Clearly distinguish between RFNBOs and advanced biofuels, which require distinct kinds of support in terms of research, development, and production. In general, different technologies require different policy approaches and timelines: regulatory frameworks should promote their complementary roles and avoid creating unintended competition between them.
12. Strengthen the focus on harmonised EU-wide standards for certification, traceability, and verification. In particular, a consistent use of the Union Database for Biofuels (UDB), robust control mechanisms, and effective access to production sites, are essential to ensure the credibility of the system and prevent fraud.
13. Prevent double counting and overlapping support schemes across Member States, to further support a level playing field and safeguard market integrity.
14. Further build the EU energy internal market by harmonising fuel standards and blending limits, setting up interoperability and user-friendly systems.
15. Consider replacing Annex IXA of the RED by a comprehensive definition of bio feedstocks in the Directive itself, allowing for more flexibility: no need to use Implementing Measures to amend the Annex, and better harmonisation between the Member States.
16. Introduce in the Directive a blending target for the heating and cooling sector, like the one for the transport sector.

17. In parallel to the revision of the RED III, work in the EU Council should be completed as regards the revision of the Energy Taxation Directive, which would encourage more effectively the uptake of renewable fuels.

UPEI would highly appreciate the opportunity to discuss these points in a meeting at your best convenience and remains at your disposal to provide more detailed information.

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 low carbon 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 energy and mobility 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.

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