

Water Package

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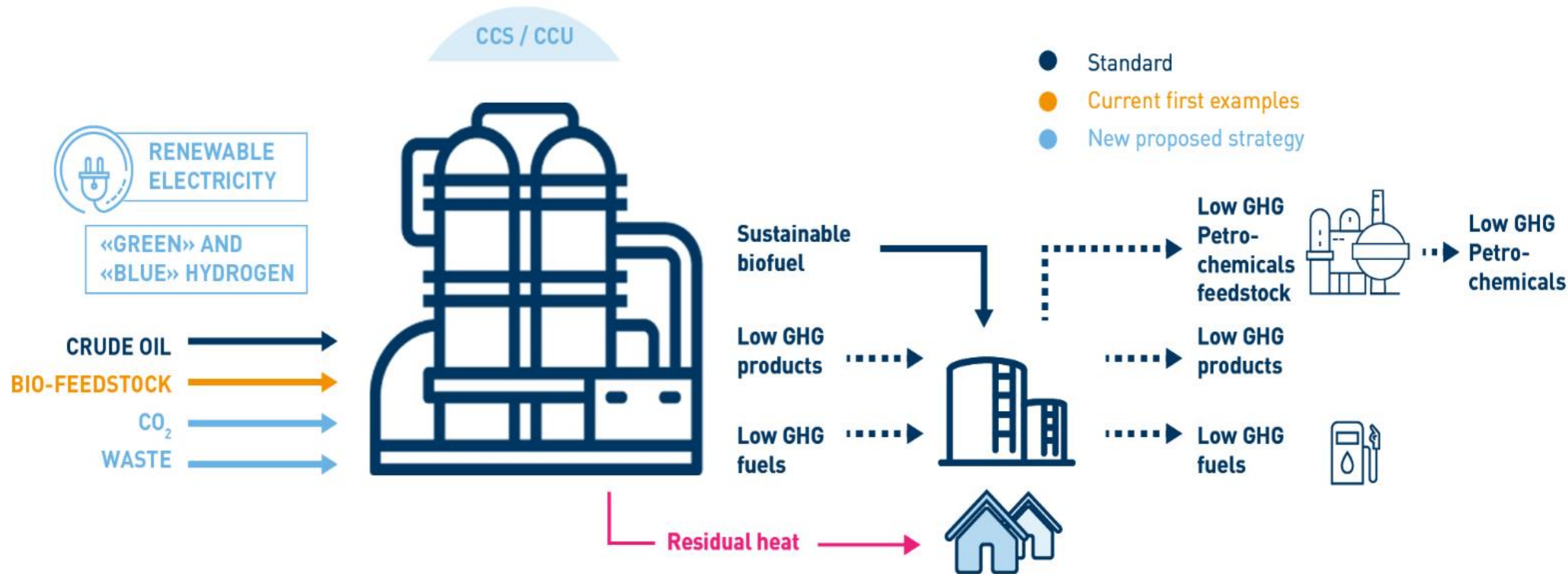


FuelsEurope represents 39 Companies ($\approx 95\%$ of EU Refining)



The future refinery: an ENERGY HUB...

... within an INDUSTRIAL CLUSTER



What is *Clean Fuels for All* about?

- 🚰 The EU refining industry's potential pathway to achieve climate neutrality by 2050 in all transport modes.
- 🚰 By 2050, at the latest, every litre of liquid fuel for transport could be net climate neutral, enabling so the decarbonisation of aviation, maritime and road transport.
- 🚰 Up to 650 bln€ investment over 30 years.

What are "Low-Carbon Liquid Fuels" ?

Renewable and sustainable liquid fuels from non-petroleum origin.

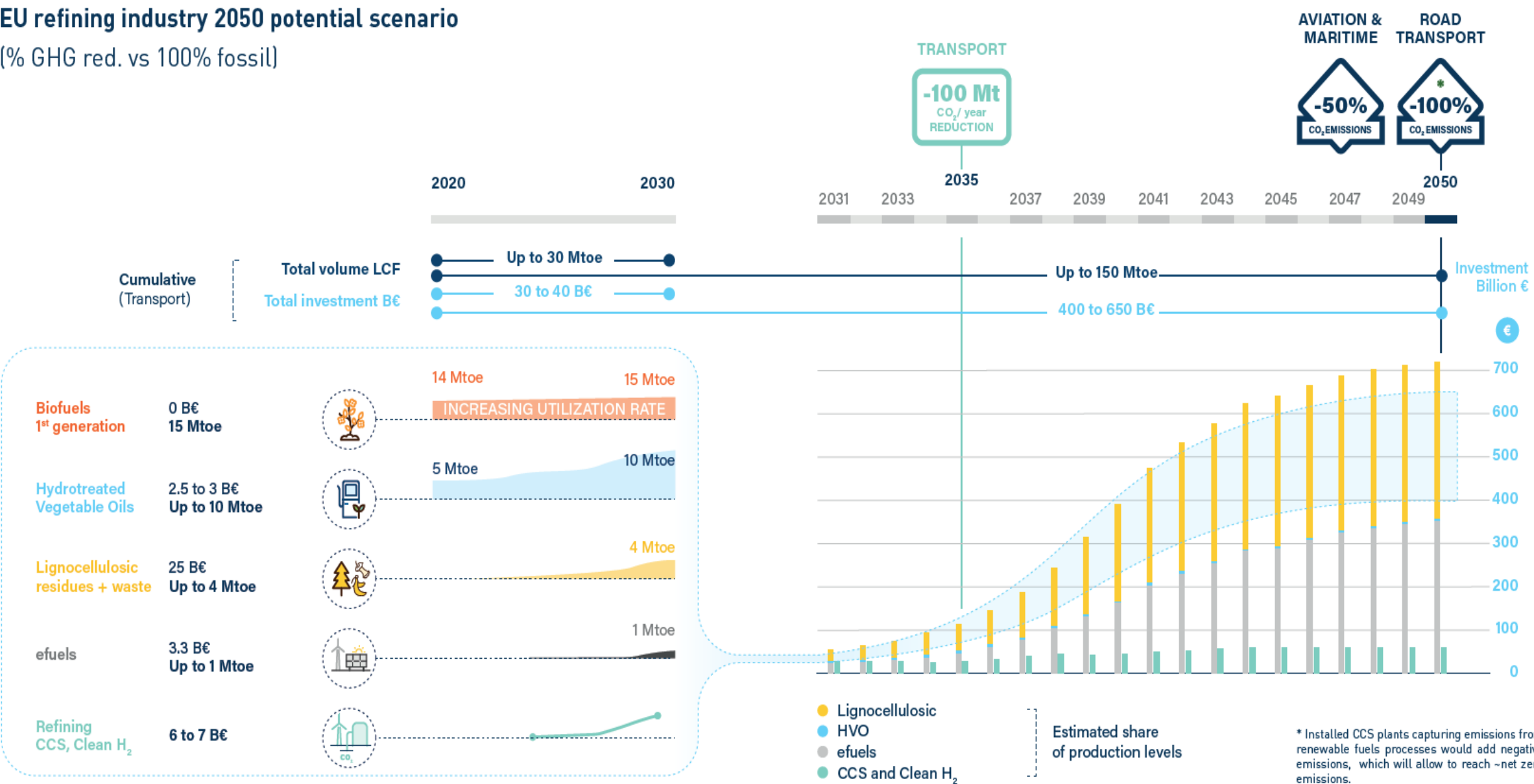
Produced from new feedstock such as biomass, renewable energy, waste and recycled CO₂.



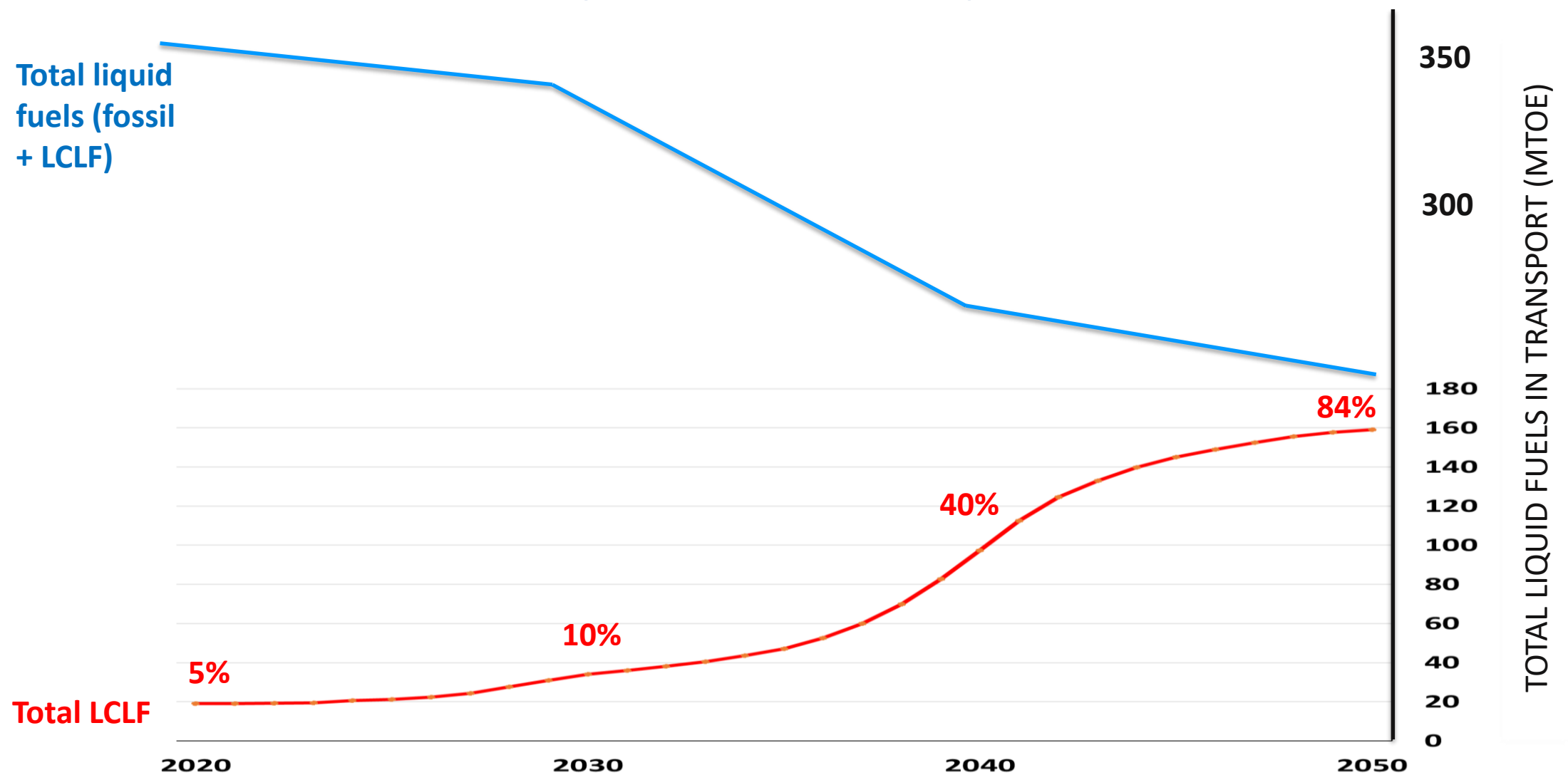
www.cleanfuelsforall.eu

EU refining industry 2050 potential scenario

(% GHG red. vs 100% fossil)



Low-Carbon Liquid Fuels progressively replacing fossil fuels in transport



FuelsEurope's elaboration, based on Concawe's scenario assuming LCLF in all transport modes.

Integrated water management package - revised lists of surface and groundwater pollutants



Key issues on the Commission's Water Package Proposal

➤ (ISSUE 1) Deletion of articles 16 and 17:

- These two articles establish that, in order to set up a list of substances, the co-decision process is foreseen. The deletion of such articles establishes the list of substances to be set up via delegated acts (rather than via co-decision process). It means smaller role of the European Parliament and the Council and less opportunities for stakeholders to provide input to the substances prioritisation process in the future.
- The current Water Framework Directive (WFD) (2000/60/EC) makes reference to using risk as the basis to identify the appropriate cost-effective and proportionate level of control, which is not included in the proposed Water Package revision, previously in Art 16(2), Art 16(6) & indirectly in Art 17(3).
 - *The respect of these principles is fundamental in order to avoid any arbitrary way of identification or prioritisation of substances. To classify and identify them, a risk assessment developed based on clear science-based methodologies is key.*

Industry recommendations:

- ❖ To object to the proposed way to regulate and keep the current co-legislative approach.
- ❖ In the case the secondary legislation is nevertheless agreed, it is critical that the above principles are explicitly mentioned in the articles enabling the Commission to adopt delegated acts.

Key issues on the Commission's Water Package Proposal

- (ISSUE 2) PFAS environmental quality standards (EQS) and ground water quality standards (GW QS)
 - The proposal sets a unique limit for 24 PFAS (in practice: PFAS limits are set at 4.4 ng/L of PFOA-equivalents, on a sum of 24 PFAS) seem to be arbitrarily low with standards based on improper derivation because of:
 - *The absence of a robust methodology (uncertainties leading to a sum-parameter for 24 PFAS).*
 - *The compounding of consistency of effects, using a single study and simplification are leading to significant uncertainty.*

We believe PFAS need to be regulated but based on a robust approach. The tools are there to use more reliable data to support the majority of PFAS but not at the level in the current proposal.

Industry recommendations:

- ❖ Use the reliable data that support the establishment of EQS for a subset of the 24 PFAS (abstain simplifying / extrapolating for the 24 PFAS).
- ❖ Include a provision requiring the Commission to come forward with a proposal to regulate the 24 PFAS as a whole at later stage after more robust data are made available, enabling the derivation of science-based standards.

Clean fuels for all

EU REFINING INDUSTRY PROPOSES A POTENTIAL
PATHWAY TO CLIMATE NEUTRALITY BY 2050



2nd Generation biofuels;
Advanced biofuels (such as algae);
Methanol, Solar, Wind



FuelsEurope

Clean fuels for all

FREQUENTLY ASKED QUESTIONS



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