

# InfluenceMap's Assessment of FuelsEurope

## A Note in Response to FuelsEurope

July 2024

### Introduction

This briefing note responds to a [statement](#) released by FuelsEurope in September 2023. It provides an explanation of key elements of the InfluenceMap methodology, a copy of FuelsEurope's updated assessment and responds to the specific comments made by the organization.

InfluenceMap's open-access LobbyMap platform was launched in 2015 and assesses the climate policy engagement of over 500 companies and 250 industry associations globally. InfluenceMap's methodology adheres to key features of sound corporate assessment metrics: objectivity, transparency, ease of comprehension and use, and allows for like-for-like comparisons across and within sectors. It is widely used and trusted by a wide range of stakeholders from the investor, corporate, media, and civil society sectors who wish to better understand this critical issue for addressing climate change.

At the core of InfluenceMap's methodology is a strict process of objectively assessing publicly available evidence of climate policy engagement, through comparison of company or industry association positions to external and authoritative benchmarks drawn from sources including the Intergovernmental Panel on Climate Change (IPCC). This process, explained in more detail below, ensures that InfluenceMap remains 'policy neutral' and does not make its own judgements on what 'good' policy engagement looks like when assessing the entities covered by the LobbyMap platform.

The metrics and summaries produced as a result of InfluenceMap analysis are based on the assessment of hundreds of items of evidence in this manner, enabling a detailed and statistically relevant assessment of each entity's full climate policy engagement activities. This highly rigorous processes ensures that the assessments are robust, and not susceptible to challenges that may be based on an attempt to 'cherry pick' a limited sample of evidence and thereby present a distorted picture.

InfluenceMap is confident in accuracy and objectivity of its assessment of FuelsEurope that is based on **1528 individually assessed** evidence pieces. An updated profile, including metrics and summary, can be found [online here](#). This information is also included in this briefing note for reference.

## InfluenceMap's Benchmarking Process

Full details on how InfluenceMap assesses organizations, including how top-line metrics are calculated, are available in the ['Our Methodology' page](#). InfluenceMap maintains a "policy-neutral" stance, refraining from taking positions or making judgments on the optimal forms of climate policy. Instead, the LobbyMap methodology relies on two authoritative external benchmarks to support its evaluations: Science-Based Policy Benchmarks and Government Policy Benchmarks.

- 'Government Policy Benchmarks' use policy statements and ambitions from government bodies mandated to implement the Paris Agreement. InfluenceMap measures the positions of companies or associations in relation to the original policy ambition stated by policymakers.
- 'Science-based Policy Benchmarks' use the analysis of the Intergovernmental Panel on Climate Change's (IPCC) to assess engagement on the role of certain technologies or emissions reduction pathways. InfluenceMap measures the positions of companies or associations in relation to the IPCC science.

The assessment of evidence under these benchmarks relies on a systematized process of discourse analysis that results in each evidence piece being coded as: 'Strongly supporting'; 'Supporting'; 'No position//Unclear position/Mixed position'; 'Not supporting'; or 'Opposing'. These codes correspond to a numerical five-point scale between +2 and -2, where +2 indicates full support for Paris and IPCC-aligned policy and -2 indicates active opposition.

Each evidence item assessed by InfluenceMap is open source and available for all users to see and comment on, with all comments monitored and subsequently reviewed. In this way, InfluenceMap makes publicly available, open-source, and evidence-based assessments of an organization's engagement with climate policy.

# Summary of FuelsEurope’s Climate Policy Engagement

InfluenceMap's climate policy engagement assessment of FuelsEurope, including access to the underlying data which forms this assessment, can be found on the association's [LobbyMap profile](#). An overview of this assessment as of July 2024 is provided in Table 1 below.

**Table 1: Overview of InfluenceMap’s FuelsEurope Assessment**

FuelsEurope		
Performance Band	D	<b>Performance Band (A+ to F)</b> is a full measure of an entity’s climate policy engagement, accounting for both its own engagement and that of its industry associations. A+ indicates full support for Paris-aligned climate policy, with grades from D to F indicating increasingly obstructive climate policy engagement.
Organization Score	48%	<b>Organization Score (0 to 100)</b> expresses how supportive or obstructive the entity is towards climate policy aligned with the Paris Agreement, with scores under 50 indicating “internal” misalignment between the Paris Agreement and the company’s detailed climate policy engagement.
Engagement Intensity	54%	<b>Engagement Intensity (0 to 100)</b> is a measure of the level of policy engagement by the entity, with scores above 12 indicating active engagement, and scores above 25 indicating highly active or strategic engagement.

Table 2: A Summary InfluenceMap's FuelsEurope Assessment (Updated July 2024)

**Climate Policy Engagement Overview:** FuelsEurope is strategically engaged on European climate policy, with a specific focus on transport-related policy including emissions standards. The association's top-line communications state support for the 2050 net-zero target and the Paris Agreement, however the association appears to take both positive and negative positions on the need for climate-related regulations to respond to climate change. The association advocates for the continued role of internal combustion engine (ICE) vehicles through the use of biofuels and e-fuels in the road transport sector, and appears to oppose policies which solely promote electrification by calling for the inclusion of 'low carbon' or renewable fuels.

**Top-line Messaging on Climate Policy:** FuelsEurope's top-line messaging on climate policy is mostly positive. In a November 2023 [letter](#) to Ditte Juul Joergensen, the Director General for Energy of the European Commission, FuelsEurope supported the objective of carbon neutrality by 2050 and in a February 2024 [open letter](#), FuelsEurope Director General Liana Gouta stated that the association stands behind the Paris Agreement. However, the association takes a mix of positive and negative positions on the need for climate-related regulations. For example, in a [follow-up communication](#) with the European Commission in December 2023, FuelsEurope advocated for policymakers to support a "clear and strong" EU Industrial Policy to transition to a decarbonized industry. However, on [Twitter](#) in February 2023, the then- Director General of FuelsEurope, John Cooper, qualified his apparent support for climate change regulation by advocating for it to be technology neutral and "preserve energy-intensive industries' competitiveness.", Cooper similarly emphasized economic and competitiveness concerns around the Fit for 55 package, on a [podcast](#) in April 2023.

**Engagement with Climate-Related Regulations:** FuelsEurope appears to have predominantly negative positions on EU climate regulations, including renewable energy policy, energy efficiency policy, GHG emissions regulations, and land use policy. In regard to renewable energy and energy efficiency policy, submitting a February 2023 [consultation response](#) that appeared to advocate for power-purchase agreements and two-way contracts for difference for renewables to be voluntary and technology-neutral, thereby reducing the ambition of the policy. The association also appeared to advocate for weaker criteria for heating systems that are considered fossil fuels under the Energy Performance of Buildings Directive, [joint statement](#).

In regard to GHG emissions regulations, FuelsEurope Director General Liana Gouta published a January 2024 [press release](#) that appeared to advocate for a weakening of the EU's Heavy-Duty Vehicle (HDV) CO2 emission standards by calling for the inclusion of renewable fuels. The association also appeared to advocate for the inclusion of low-carbon fuels as a compliance pathway in this policy in a March 2023 [letter](#) to Frans Timmermans, submitted as consultation response. FuelsEurope subsequently submitted [comments](#) on the EU 2040 Climate Target in June 2023, in which the association appeared to advocate for the national targets under the Effort Sharing Regulation to be limited to GHG emissions not covered by the EU ETS and to be replaced by EU-wide sectoral legislation, which would reduce the ambition of the policy.

In regard to land use policy, in January 2023 [feedback](#) on the delegated act on Renewable Energy Directive (RED) Annex IX feedstocks, FuelsEurope appeared to oppose additional restrictions on ReFuelEU Aviation feedstocks for sustainable aviation fuels, which would reduce the stringency of the policy.

**Positioning on Energy Transition:** FuelsEurope appears to consistently advocate for the use of biofuels and e-fuels in transport, with the aim of promoting the continued use of ICE vehicles. Although the association supports the electrification of transport, it appears to oppose policy which promotes solely electric light or heavy-duty vehicles, or renewables, and instead appears to advocate for a ‘technology neutral’ approach to policy that would enable the inclusion of ‘low carbon’ or ‘renewable fuels’.

For example, in a [letter](#) to Frans Timmermans submitted as a consultation response in March 2023, FuelsEurope appeared to advocate for a technology-neutral approach towards the decarbonization of HDVs and promoted a long-term role for ICE HDVs powered by carbon-neutral fuels. In a March 2022 [open letter](#) to the French President, FuelsEurope’s previous Director General, John Cooper, appeared to oppose the EU’s 2035 effective internal combustion engine (ICE) phase-out date, advocated for a long-term role for ICE and hybrid vehicles post-2035, and promoted the use of low-carbon fuels to achieve decarbonization over rapid electrification. In a [joint letter](#) to Frans Timmermans in February 2023, Cooper appeared to again advocate for a long-term use of biofuels/synthetic fuels alongside a transition to Zero Emissions Vehicles (ZEVs), and also emphasized concerns with a complete transition to ZEVs.

The association also appeared to advocate for extending the focus of the Net Zero Industry Act to all low-carbon and renewable energy sources, in [comments](#) submitted in May 2023, which would weaken the ambition of the policy. In a [position paper](#) in June 2023, FuelsEurope again appeared to advocate for list of strategic net-zero technologies under the EU Net-Zero Industry Act to include renewable and low-carbon fuels for use in road transport as well as Carbon Capture and Utilization (CCU).

FuelsEurope appeared unsupportive of the EU’s Electricity Market Design revision in a [joint statement](#) in May 2023, calling for energy to be supplied in a technology neutral manner and for renewable capacity to be expanded at a ‘realistic’ speed. The association also appeared to advocate for relying on industrial carbon removals, rather than GHG emissions reductions in the EU 2040 Target, in [comments](#) submitted on the policy in June 2023.

## Response to specific comment's raised in FuelsEurope's September 2023 letter

FuelsEurope Comment	InfluenceMap Response
<p>We consider the assessment and the ranking highly subjective, unfair, and disprovable with publicly available facts regarding FuelsEurope's positions and publications. Your work and wording suggests that the ranking may have been decided in advance, with the very limited analysis merely looking for some minimal (but actually incorrect) justification for your decision.</p>	<p>InfluenceMap's methodology adheres to key features of sound corporate assessment metrics: objectivity, transparency, ease of comprehension and use, and allows for like-for-like comparisons across and within sectors.</p> <p>At the core of InfluenceMap's methodology is a strict process of objectively assessing publicly available evidence of climate policy engagement through a comparison of company or industry association positions to authoritative, external benchmarks drawn from sources including the Intergovernmental Panel on Climate Change (IPCC). This process ensures that InfluenceMap remains 'policy neutral' and does not make its own judgements on what 'good' policy engagement looks like when assessing the entities covered by the LobbyMap platform.</p> <p>The metrics and summaries produced as a result of our analysis are based on the assessment of hundreds of items of evidence in this manner, enabling a detailed and statistically relevant assessment of each entity's full climate policy engagement activities.</p> <p>InfluenceMap encourages comment and feedback on our assessment of each evidence item through a comment function on each entity's publicly accessible profile.</p> <p>Our highly rigorous processes ensures that the assessments are robust and not susceptible to challenges that may be based on an attempt to 'cherry pick' a limited sample of evidence and thereby present a distorted picture.</p> <p>InfluenceMap research on FuelsEurope includes 1528 assessed evidence pieces.</p> <p>InfluenceMap is confident in accuracy and objectivity of its assessment of FuelsEurope that is based on 1528 individually assessed evidence pieces.</p>

We were not given the possibility to comment on your assessment before its publication. This is quite disappointing, as allowing the party that is subject to the investigation to provide clarifications is commonly accepted as a fair behavior. With no justification, this time you decided to deviate from what you had done in the past when you shared with us a preview of your assessment. We would like to point out that this would have allowed you to avoid several inaccuracies in your report.

InfluenceMap’s reports use and refer to our online LobbyMap profiles for companies and industry associations, which are updated on a rolling basis. All evidence entered into a LobbyMap profile is publicly accessible, with a built-in comment function allowing anyone to leave a comment, such that feedback will be forwarded and immediately addressed by InfluenceMap’s team.

InfluenceMap pre-engaged FuelsEurope in 2021 ahead of the publication of [a report](#) and took on board the feedback. FuelsEurope’s LobbyMap profile has since remained live and is continuously updated. We always welcome engagement on our assessments and would be happy to answer any further questions.

You claim that the November 2022 joint statement on ETD does not define “renewable and low-carbon fuels”. You apparently missed the footnote at page 1 of the statement, where we give a clear definition.

InfluenceMap updated the score of this [evidence item](#) from 0 to +1 to reflect the definition found in the footnote, following the September 2023 statement.

This item was amongst hundreds of evidence items on FuelsEurope’s engagement on the energy mix and the role of low-carbon fuels gathered and assessed by InfluenceMap. The updated score in this item has therefore not significantly impacted FuelsEurope’s final scores and overall assessment.

About the July 2022 open letter on ETS, you claim that FuelsEurope “appeared unsupportive” of the proposal to increase the ambition of the ETS. This is an incorrect interpretation, as FuelsEurope not only does not challenge the level of ambition, but also writes in the same document that “[...] higher climate ambition needs to be achieved cost effectively and be accompanied by strengthened carbon leakage protection [...]”

The *open letter* is assessed using InfluenceMap’s ‘Government Policy Benchmarks’. In this case, the European Commission’s original ambition is used as InfluenceMap’s benchmark. This is because the EU Commission is the main executive body of the European Union, and is responsible for drawing up proposals for new European legislation and has the institutional capacity to provide robust impact assessments/analysis of policy proposals.

The European Commission stated in its *inception impact assessment* that the Carbon Border Adjustment Mechanism (CBAM) is “an alternative to the measures that currently address the risk of carbon leakage in the EU’s Emissions Trading System” and accordingly sought to phase out the allocation of free allowances following the introduction of the CBAM. It further noted in its Impact Assessment report that “the CBAM and free allowances are two mechanisms that serve a similar purpose, preventing the risk of carbon leakage. The two mechanisms cannot offer ‘double protection’ and should not coexist in the long run as this would diminish the environmental objectives of both EU ETS and the CBAM”.

The open letter signed by FuelsEurope assessed here states that the “latest proposals on ETS and CBAM weaken carbon leakage provisions, further increase unilateral regulatory costs and harm the competitiveness of European industries in EU or international markets. Instead, higher climate ambition needs to be achieved cost effectively and be accompanied by strengthened carbon leakage protection on EU and export markets against both direct and indirect carbon costs.”

The ‘latest proposals’ in this instance refer to the *European Parliament’s ENVI committee proposal* for a faster phase out of the free allocation of emissions allowances.

InfluenceMap is confident in its assessment that the evidence indicates that FuelsEurope is not supporting policy to phase out ‘carbon leakage protection’ in the form of free allocation of emission allowances (and thus remove the ‘double protection’ that the EU Commission suggests should

	<p>not coexist for an extended period as it would diminish the environmental objectives of the EU ETS and CBAM).</p> <p>As such, the evidence is assessed -1 (on a scale between -2 and 2+), equivalent to an assessment of “Not Supporting” or “Supporting with significant exceptions”. Note – this evidence has not been scored -2, which would indicate more specific opposition to EU ETS/CBAM policy.</p>
<p>In several entries, you state that it is not clear whether our support for renewable liquid fuels includes fossil fuels. What we mean by renewable liquid fuels is clearly stated and documented throughout FuelsEurope’s many public documents, starting from the Clean Fuels for All. As a further proof, please see our February 2023 press release (also quoted in your report) where we write “100% renewable (non-fossil) fuel(s)”, for the avoidance of any doubt.</p>	<p>InfluenceMap has sought to clarify the descriptions of the assessments referred to here.</p> <p>FuelsEurope’s communications on the energy mix are assessed using Science-based Policy Benchmarks. Each evidence item found is assessed independently, on its own merit. InfluenceMap has identified multiple instances where FuelsEurope has used the terms such as ‘low carbon fuels’ without including clarification, within the relevant communication, of what is covered by this term.</p> <p>For instance, in an <a href="#">open letter</a> to the European Court of Auditors in February 2024, the Director General of FuelsEurope, Liana Gouta, appeared to advocate for the use of renewable fuels and e-fuels in transport, stating that these fuels can be made from low-carbon or renewable sources without providing further details on their production. This statement has therefore been assessed 0 (on a scale between -2 and +2), indicating an ‘unclear position’.</p> <p>In cases where it is clear that the definition is limited to 100% renewable fuels, this would not trigger a negative assessment. However, it is noted here that InfluenceMap’s assessment of FuelsEurope has identified instances where, even though a full definition is provided, the organisation is promoting such fuels for road transport over pathways that favour electrification.</p> <p>For example, on the associations’ Clean Fuels for All <a href="#">website</a>, FuelsEurope appears to promote a longer-term role for ICE vehicles powered by renewable fuels. This does not appear to support the need for the rapid electrification of transport as indicated by the IPCC and been assessed -1 (on a scale</p>

	<p>between -2 and +2), indicating an 'unsupportive position' on the transition of the energy mix.</p>
<p>FuelsEurope is accused of upholding the technology-neutrality principle. You have not made the case as to why supporting this principle equates to less climate action. Indeed, we strongly support the fundamental role that this widely accepted principle needs to play in regulatory design. Arbitrary selection of specific technologies have proven to lead to suboptimal results for climate, environment, economy, industrial competitiveness and welfare of the people.</p>	<p>InfluenceMap's assessment process relies on a comparison of company or industry association positions to external and authoritative benchmarks drawn from sources including the Intergovernmental Panel on Climate Change (IPCC).</p> <p>The IPCC explains that as high technology costs limit market adoption, new technologies can struggle to compete with incumbent technology even if they would have positive societal impacts (IPCC_AR6_WGIII_Chapter14, p. 10). The IPCC specifically highlights the role of "technology specific" policy as having "led to a greater use of less carbon intensive (e.g., renewable electricity) and less energy intensive (especially in transport and buildings) technologies," noting that the uptake of renewable energy sources globally is largely attributable to this form of policy (IPCC_AR6_WGIII_Chapter14 p.31).</p> <p>InfluenceMap's assessment does not penalize references to technology-neutrality in principle. However, InfluenceMap's analysis shows that arguments referencing 'Technology Neutrality' are often utilized to oppose or dilute technology-specific policy, often in an effort to insert alternative technologies that are not optimal from the perspective of emission reductions according to IPCC guidance. In such cases, this evidence would be scored negatively.</p>
<p>FuelsEurope is accused of highlighting the risk of carbon leakage for EU industries. You have not made the case that carbon leakage protection equates to less climate action. In fact you seem to not understand that an industry needs to be competitive, especially against imported products that have not been subject to carbon costs, in order to be able to invest for the energy transition. This has long been recognised as necessary in climate policy by a wide group of experts. We are indeed strongly calling for the creation of a level playing field for international firms to compete in the EU and worldwide, overcoming the impact of unequal cost burdens from national legislations. In the absence of such measures against carbon leakage, the relocation of EU's investments and manufacturing activities abroad damages</p>	<p>InfluenceMap maintains a "policy-neutral" stance, refraining from taking positions or making judgments on the optimal forms of climate policy. Instead, the LobbyMap methodology relies on two authoritative external benchmarks to support its evaluations: Science-Based Policy Benchmarks (drawn from the work of the IPCC) and Government Policy Benchmarks (drawn from the statements of government bodies mandated to act on climate in a particular region). In the case of EU climate policy, including the EU ETS and CBAM, the European Commission's original ambition is used as InfluenceMap's benchmark to assess FuelsEurope's engagement with carbon leakage measures.</p>

the global climate and the EU economy, increases the dependency of the EU from other regions (undermining security of supply and resilience of our value chain) and leads to substantial job losses.

The European Commission stated in its [inception impact assessment](#) that the Carbon Border Adjustment Mechanism (CBAM) is “an alternative to the measures that currently address the risk of carbon leakage in the EU’s Emissions Trading System” and accordingly sought to phase out the allocation of free allowances following the introduction of the CBAM. It further noted in its Impact Assessment report that “the CBAM and free allowances are two mechanisms that serve a similar purpose, preventing the risk of carbon leakage. The two mechanisms cannot offer ‘double protection’ and should not coexist in the long run as this would diminish the environmental objectives of both EU ETS and the CBAM”.

As such, evidence of an entity pushing for additional or extended carbon leakage measures, or leveraging the concept of carbon leakage to push against climate policy ambition, is assessed negatively under InfluenceMap’s system.

FuelsEurope is accused of opposing the electrification of road transport. This is patently false, as not only many of our members are strongly engaged in the value chain of electromobility, but FuelsEurope is very clear in its statements that vehicle electrification is one of the main solution for decarbonisation of transport. In the name of the principle of technology neutrality (see above) we say that other low and zero-carbon solutions should be given the possibility to complement and compete with electrification. Renewable, non-fossil fuels in ICE and hybrid vehicles are one of the possible complementary solutions. The competition of decarbonisation technologies, in addition to ensuring a faster and more economic-efficient decarbonisation of transport, will offer a choice to citizens and businesses without restricting access to affordable mobility.

InfluenceMap has sought to clarify the summary of its assessment of FuelsEurope’s engagement on policy concerning the electrification of road transport in its updated profile (see table 2). However, the analysis continues to find multiple instances of engagement by FuelsEurope that is misaligned with IPCC guidance on transport electrification, or where FuelsEurope has opposed policy designed to specifically support electrification. For example, FuelsEurope directly opposed the EU 100% CO<sub>2</sub> emissions reduction target for heavy-duty vehicles in a March 2022 [consultation response](#).

High-level statements on the role of electrification of road transport are scored using ‘Science-based Policy Benchmarks’. These are created using the IPCC AR6 WG3 report, which notes that electric vehicles powered by low emissions electricity offer the largest decarbonization potential for land-based transport.

Specific comments on government policy designed to support the electrification of transport (e.g. the EU’s CO<sub>2</sub> emission performance standards for cars and vans) would be

	<p>assessed against the EU Commission's original proposal for the policy.</p> <p>In both instances, advocacy that is understood to not support a focus on electrification and achieving 100% CO2 reductions from road transport is assessed negatively under these benchmarks.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------