

FinMobility, which represents the Finnish road transport sector at the EU level, welcomes the opportunity to contribute to the forthcoming Sustainable Transport Investment Plan initiative and presents the following position.

Road Transport Cannot Be Overlooked

FinMobility has repeatedly emphasised that Europe's leading mode of transport, road transport, cannot be overlooked in the preparation and implementation of the EU's transport investment plan. Renewable liquid fuels and renewable gases, such as biogas, represent a real alternative to electrification and can rapidly accelerate the transition away from fossil fuels in heavy-duty transport.

Since Finland and Sweden have the largest and heaviest road transport combinations in Europe, we also face the greatest challenges in the shift to new power sources. To ensure **technology neutrality**, it is essential to provide options that simultaneously support agreed climate and environmental targets by reducing emissions in line with the set objectives. Carbon-neutral fuels (biogas, renewable liquid fuels) make this possible also in the road transport sector, where electrification poses challenges.

Supporting the EU's Sustainable Transport Investment Plan

We welcome the European Commission's objectives for the Sustainable Transport Investment Plan (STIP): to assess the investment needs for decarbonization across all modes of transport, to promote clean energy and technology investment goals for the 2024–2029 period, and to strengthen the competitiveness and energy self-sufficiency of the transport sector.

We also see it as essential to remove market barriers for producers of renewable fuels and to provide clear roadmaps for each mode of transport, including road transport. In addition, it is crucial to develop and establish new funding sources and models—both at the EU and national levels—for the large-scale production of renewable, low-carbon fuels.

Technology Neutrality on the Path to Zero-Emission Transport

- The message from Finnish road transport stakeholders: Open both CO₂ Standard regulations for vehicles and include renewable fuels and gases as well as synthetic fuels alongside electricity and hydrogen to ensure the competitiveness and diversity of the sector.
- Ensure that the distribution infrastructure for all utilized energy sources is comprehensive – but proportionate to traffic density and requirements.

• Do not force stakeholders into specific choices but maintain market choice – the same applies to the division of labour between transport modes.

Further information:

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