

ECFD Position Paper

Call for Evidence – European Heating and Cooling Strategy

Brussels, 09.10.2025

The European Confederation of Fuel Distributors supports the European Commission's objective to achieve climate neutrality in 2050. Shaping the future of European heating in a **technologically neutral way** is crucial for delivering on this ambition.

The European Heating and Cooling Strategy should reflect that across Europe 20 million households in rural and off-grid communities rely on liquid fuels for heating their homes. They are not connected to the gas network and transitioning to electric or district heating would involve significant challenges and financial costs.

Renewable liquid fuels – e.g. biofuels, such as HVO and FAME with a CO₂ emissions reduction of up to 90% – can **drive the defossilisation of buildings**, while **keeping heating affordable for lower-income households** and contributing to the **resilience and preparedness of local communities** across Europe.

Technology neutrality and consumer choice should be the guiding principles underpinning non-legislative EU action on heating. The necessary transition towards renewable liquid fuels will be accelerated when consumers can freely choose the heating technology – or combination of technologies – that is the right fit for their homes. **Modern hybrid heating systems** – a heat pump and a liquid fuel condensing boiler – **ensure greater efficiency and resilience**, while adding solar panels to a boiler running on renewable liquid fuels may significantly upgrade a building's energy performance.

The Commission should therefore facilitate the uptake of all renewable technologies, including renewable liquid fuels, in the implementation of the EU's energy and climate policy framework affecting heating, such as the Energy Performance of Buildings Directive (EPBD), the Renewable Energy Directive (RED), the Energy Taxation Directive (ETD) and national energy and climate plans (NECPs). It is important in this regard that no unnecessary burdens are created at national, regional, or local levels.

Against this background, we call upon the EU Institutions to take into account the following strategic advantages that renewable liquid fuels bring into the European energy mix:

1. Defossilisation

The heating oil sector can enable the progressive greening of Europe's energy supply through increased blending with biofuels or synthetic fuels, such as e-fuels.

- **Existing fuel boilers can be easily adapted** to heat homes through, for example, HVO- or FAME-based blends.
- **In Germany, new heating oil systems and condensing boilers are "green fuels ready"** and are labelled accordingly.

- **Using existing infrastructure** – transportation and distribution, storage, boilers – **would bring about faster emissions reductions** than building new energy infrastructure.

2. Rural, off-grid communities

Liquid fuels remain essential for rural, off-grid communities, providing an affordable, reliable energy source.

- **20 million European households rely on liquid fuels for heating their homes.**
- In **rural areas and mountainous regions** liquid fuel technology is often the best suited technology available.
- Electrification may be technologically difficult in these areas and therefore too costly an investment for power grid companies to undertake.

3. Resilience and Preparedness

The liquid fuels sector contributes towards European resilience and civic protection through its decentralised nature.

- Amid a worsening global geopolitical outlook across Europe, member states are facing emerging **hybrid threats to their infrastructure**, including energy and power-grid infrastructure.
- **Liquid fuels are stored across various parts of the supply chain** – from traders to various small- and medium-sized fuel distributors – and in storage tanks in **citizen's homes**:
 - Better **preparedness** in case of disruptions to energy infrastructure
 - Allows for **stockpiling** of fuel supplies by traders, distributors, and consumers.
- Liquid fuels are the **proven backbone for e.g. emergency power generators applied in important facilities**, such as hospitals.

About ECFD:

*The European Confederation of Fuel Distributors represents the interests of more than **10,000 independent distributors of liquid fuels**, ensuring that demands of fuel retailers are heard at the EU level. Our members provide a range of products and services to European consumers. With an average of **60% of independent petrol stations being family-owned**, ECFD members supply tens of millions of tons of conventional fuels, biofuels, LPG and CNG. Furthermore, our members own convenience retail outlets and motorway service areas providing a vital service to **local communities in cities and rural areas**. They also supply fuels used in **agricultural machinery and shipping** as well as manage direct B2B relationships with **road haulage companies**.*