



About bp

As an integrated energy company, we believe we have a world-class portfolio – a top-tier oil and gas business in attractive basins, and leading integrated positions and brands across the value chain. All underpinned by distinctive capabilities in trading, technology and partnerships.

We are an integrated energy company, one of only a few that can deliver energy at global scale through a decades-long energy transition. Our purpose is to deliver energy to the world, today and tomorrow.

We agree on the need for the world to move to net zero emissions and we support the climate goals contained in the Paris Agreement. We also support the UNFCCC and Intergovernmental Panel on Climate Change (IPCC) processes.

We plan to invest with discipline: with selective investment in biogas, biofuels and EV charging, where we see strong demand growth; adopting innovative capital-light partnerships in renewables; and focusing investment on hydrogen and carbon capture projects to support us in decarbonizing our operations, and position us for growth through the next decade.

bp has operated in the Netherlands for more than 50 years. It is on this basis that we are happy to respond to this consultation, and we hope our response can help build a common understanding of the opportunities and challenges ahead, in aid of the Netherlands' national climate ambitions.

Introduction

- bp welcomes the ambitions of The Netherlands to accelerate climate action as stipulated in the *Klimaatwet* and understands this proposal is meant to support decarbonization of the transport sector.
- bp appreciates that the Ministry of Infrastructure and Waterways has published this consultation and all previous RED III implementing acts in a timely manner to allow the market to arrange its compliance before entry into force in January 2026.
- bp highly values the opportunity offered by the Ministry of Infrastructure and Waterways to contribute to the regulation.

General commentary

- bp would like to request the Ministry provide clarity on extending the obligations under RED III beyond 2030, at least until 2035 but preferably until 2040.
- bp is in favour of an annual review of differences between The Netherlands and neighbouring countries in terms of the level-playing field for sustainable fuels.
- bp expects the liquidity of some of the ERE tickets to be very low and would like to know whether the Ministry intends to review this set-up during the annual reviews. For example, the ZRE-other ticket might have very low liquidity.

Questions and considerations

Marine sector

- The marine obligation as outlined in the REV rests on the entity writing out the Bunker Delivery Note (BDN). The *Vergunning Accijnsgoederenplaats* (AGP) is not leading in this case and does not always coincide with the BDN. Article 20.2.c stipulates that for RFNBOs the AGP is leading; does this also cover marine deliveries? bp offers that it might make more sense to harmonise all fuel deliveries to marine through the BDN.

RFNBOs

- bp welcomes the intermediate route with a fixed correction factor at 1.0 until 2030. bp believes this policy measure could provide the right signals to incentivize the use of RFNBO hydrogen in (bio)refining.
- At the same time, the Dutch Parliament has asked during the *Wetgevingsoverleg* on September 29th, 2025, for an extra 2PJ of direct use in the road sector. bp believes such a target would be extremely challenging due to challenging market conditions and demand from the vehicle fleet not rising as quickly as initially expected. bp would therefore request that the Ministry provide the possibility of a buy-out should the RFNBO target be further increased.
- Art. 26 REV stipulates that if RFNBO is used for the production of conventional fuels or biofuels, the energy content needs to be established as per subs a, b and c, due to its energy content being absent in Annex III to the RED III. bp would like to ask the Ministry what its reasoning is for adding this demand, especially since the energy content of renewable hydrogen is established in Annex III to the RED III at 120 MJ/kg.
- Art. 27 REV prescribes the volume of hydrogen to equal in liters at 15 degrees Celcius or kilogrammes. Common volumetric reporting for used hydrogen in our processes is in cubic metres per hour. bp would like to ask the Ministry why a conversion to liters or kilogrammes is necessary and if so, would like to request the Ministry also specify at what density the volume should be calculated.

Co-processing

- bp understands the approach of the Ministry to only account biofuels towards the Dutch transport renewables compliance that are placed on the market in the Netherlands.
- RED III has ambitious goals for transport. To meet these, fuel suppliers will need multiple solutions to achieve a higher renewable share in their fuels, but potential options are limited.



- Ethanol and FAME have blending limitations through the fuel standard. Most other biofuel production technologies like 2G pathways still have not reached commercialization and need further development. The only viable solutions for reaching short term targets to 2030 are co-processing and HVO blending;
 - RefuelEU Aviation regulation might also drive conversion of HVO production capacities towards HEFA SAF longer term, so the competition for standalone capacity will grow.
- Therefore, bp thinks that co-processing can play a crucial role in liquid fuel decarbonization. However, using co-processing for transport fuel compliance in the Netherlands is nearly impossible.
 - Refineries have limited capability for processing bio feedstock as their systems have not been designed for that. Still, a 0-5% bio intake into certain units usually is possible. Considering the substantial production capacities, even small ratios can end up delivering significant biofuel volumes.
- The main issue with accounting is that the low bio-feed share co-processed in refineries is usually blended with further streams and also mixed with other products at terminals, potentially ending up in such low ratios at the point of market supply, that it cannot be precisely measured with the C14 method.
- Furthermore, the Delegated Act for Coprocessing 2023/1640 has further harmonised at EU level the coprocessing activity establishing that the C14 testing that can only be undertaken at coprocessing/Refinery level, and being established that Mass Balance Rules would apply from there downstream towards compliance point – Article 7.3.
- We would therefore like to propose a solution:
 - After refineries produce bio feedstock in a certain process, the bio share of the end product can be measured with C14 and/or equivalent methods..
 - The share of this co-processed stream that ends up in the Dutch market can be tracked. In case the streams are blended or mixed, the bio ratio can be easily adjusted by calculation. For example, a 50-50% blend of a co-processing free fuel with a 1% bio content fuel would become 0.5% bio ratio fuel.
 - It can be tracked and monitored how the biofuel content was calculated along the chain back to the production and the C14 analysis.
 - This would help co-processed biofuels to contribute to the achievement of national and EU goals and also leave the opportunity to check whether proper volumes have been accounted for.

Other issues

- bp understands the Dutch Parliament vote during the *Wetgevingsoverleg* on September 29th, 2025, to only allow non-denatured ethanol to count towards the RED III targets, but fears that this measure will increase the prices at the fuel pump significantly as it might be challenging to shift supplies at such short notice before the 1st of January 2026.
- bp interprets the RED III as allowing mass-balanced bio-LNG to count towards the RED III targets, however, specifically for The Netherlands bp would like to caution the Ministry that allowing mass-balanced bio-LNG on short term would threaten the biodiesel for marine market until biogas targets for other sectors increase. A potential solution to remedy this risk could be to increase the targets if mass-balanced bio-LNG becomes eligible.



Closing remarks

We sincerely hope this input will aid the Ministry in working out the REV to its completion. In case of questions or requests for clarification on the content of this paper, please do not hesitate to reach out to bp.

We look forward to continuing engagement, particularly in light of the possibility of extending the mandates beyond 2030.