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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: AOB for the meeting of the Transport, Telecommunications and Energy Council on 16 December 2024  
Towards the export of cleaner fuels: a commitment to public health and the environment  
- Information from Belgium, the Netherlands and Luxembourg

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*Towards the export of cleaner fuels: a commitment to public health and the environment  
Information from Belgium, the Netherlands and Luxembourg*

Motor fuels commercialised in the European Union (EU) or the European Economic Area (EEA) shall meet the requirements of Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 on the quality of petrol and diesel fuels.

However, these requirements do not apply to the export of fuels to countries that are not members of the EU or the EEA. Research has shown that petrol and diesel exported from the ‘ARA’ region (Amsterdam, Rotterdam and Antwerp) to ECOWAS (Economic Community of West African States) countries contained much higher concentrations of sulphur, benzene and manganese than are allowed in European petrol and diesel. Reports demonstrated the presence of blends containing up to 3000 ppm of sulphur for diesel and 1000 ppm for gasoline (which is 100 to 300 times the sulphur standard limit applicable in the EU), polycyclic aromatic hydrocarbons (PAH) concentration twice as high as the European standard, and manganese contents in gasoline of up to 43-65 mg/l (EU standard: 2 mg/l of manganese).

High concentrations of these substances in petrol and diesel lead to much higher emissions of particulate matter, SO<sub>2</sub>, benzene, VOCs (Volatile Organic Compounds) and other air pollutants than petrol and diesel used in Europe. Use of high-sulphur diesel also leads directly to black carbon emissions. This in turn results in reduced air quality, severe health complaints and premature deaths, for example in urban areas/agglomerations in ECOWAS countries. Reports also elaborated that the cost of the health damage is expected to be much higher than the cost of improving fuel quality.

To reduce these health risks, the United Nations Environment Programme (UNEP), through the Partnership for Clean Fuels and Vehicles (PCFV), and African countries have long campaigned for similar standards for motor fuels in all African countries. These fuels are largely imported from Europe, but more flexible standards allow the export of fuels containing levels of sulphur, benzene and manganese that would be illegal in the EU. At the UNEP high-level African petroleum ministers meeting on cleaner fuels, held in Nairobi on 29 and 30 November 2022, recommendations were made for the implementation of quality requirements for road fuels on the African continent, including recommendations for exporting countries.

In response, exporting Benelux countries adapted their own national policy or legislation. In addition, on 18 November 2024, the Benelux Committee of Ministers adopted a Benelux recommendation on the export of cleaner fuels and vehicles to third countries. The aim is that, if not done yet, national binding legislation on the above-mentioned requirements will be implemented by all exporting Benelux countries by 1 January 2027 the latest. An additional benefit is that this will prevent shifting trade flows inside the Benelux. With this Benelux recommendation, Belgium, the Netherlands and Luxembourg underline their commitment to a joint approach and mutual cooperation within the Benelux and, as a laboratory for Europe, are setting an example of good practice.

The three Benelux countries believe that it is desirable to join forces with the European Commission and other EU Member States by seeking convergence of policies in this area, harmonisation of the applicable requirements and close cooperation in monitoring them, while taking account of the interests of destination countries outside the EU, and building on cooperation with other exporting countries and other stakeholders, thereby helping to create a level playing field.