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Verkehr: **Beschleunigte Dekarbonisierung mit ambitionierter THG-Quote**



Die Umsetzung der Revision der Erneuerbare-Energien-Richtlinie (REDIII) in das deutsche Bundes-Immissionsschutzgesetz (BImSchG) bietet eine zu ergreifende Möglichkeit, die Treibhausgasminderungsquote als marktbasierendes Instrument für den starken Hochlauf von erneuerbaren Energien für den Verkehr zu nutzen.

Zentral für die Erreichung dieses Ziels sind folgende Punkte:

- **Ambitionierte THG-Quote:** Die Anhebung der Mandatshöhe gem. §37a Abs. 4 BImSchG sollte zeitnah insbesondere in den Jahren 2025-2029 erfolgen, so dass die THG-Quote in einem ambitionierten Verhältnis zu den verfügbaren Erfüllungsoptionen steht. Eine Steigerung der THG-Quote auf 14,5% im Jahr 2025 und ein folgender linearer Anstieg von jährlich ca. 2%-Punkten auf 25% im Jahr 2030 ermöglicht eine forcierte Incentivierung von erneuerbarem Wasserstoff und der E-Mobilität.
- **Europäische Harmonisierung für die Luftfahrt:** Aktuell besteht durch die deutsche PtL-Quote (§37a Abs. 4a BImSchG) ein zusätzliches Mandat für die Luftfahrt, welches nicht mit den Vorgaben der ReFuelEU Aviation vereinbar ist. Für einen europäisch einheitlichen Ansatz sollte der Fokus auf die Ziele der ReFuelEU Aviation gelegt und somit die deutsche PtL-Quote gestrichen werden.
- **Sektorale Ziele:** Wichtig ist in diesem Zuge, dass die REDIII-Sektoren separat adressiert werden, d.h. die deutsche THG-Quote gem. §37a Abs. 4 BImSchG sollte sich auf die Energiemengen der Straße (in Verkehr gebrachte fossile Otto- und Dieselmotorkraftstoffe sowie relevante Erfüllungsoptionen) beziehen; ReFuelEU Aviation und FuelEU Maritime definieren die europäischen Ziele für die Luftfahrt und die Schifffahrt. Ansonsten besteht die Gefahr, dass die jeweiligen Sektoren um die erneuerbaren Kraftstoffe zu stark im Wettbewerb stehen und somit nicht alle Sektoren zur Dekarbonisierung des Verkehrs adäquat beitragen.

- **Sub-Quoten und Mehrfachanrechnung:** In der Ausgestaltung der Erfüllungsoptionen sowie der jeweiligen Mehrfachanrechnung sind die Verfügbarkeit und Kosten der jeweiligen THG-Minderung zu berücksichtigen. Eine ambitionierte Sub-Quote für fortschrittliche Kraftstoffe sowie eine lineare Reduktion der Obergrenze für Nahrungs- und Futtermittel auf 2,5% im Jahr 2030 wäre in Anbetracht der verfügbaren Mengen sinnvoll. Weiterhin sollte im Sinne der Technologieneutralität die Angleichung der Mehrfachanrechnung für RFNBOs und Strom von Faktor Drei beibehalten werden.

Durch folgende weitere Maßnahmen können Investitionssicherheit und zusätzliche Anreize für emissionsfreie Technologien wie E-Mobilität und erneuerbarem Wasserstoff geschaffen werden.

- Der Rechtsrahmen muss für die Jahre 2031+, mindestens aber für 2031-2035, verlängert werden, um langfristige **Investitionssicherheit** zu gewährleisten.
- Wir empfehlen ein **Unterziel von 1 % RFNBO und 4,5 % Annex 9A** für den Verkehrsbereich (Straße) im Jahr 2030, um Anreize für den RFNBO-Ausbau und den Übergang zu fortschrittlicheren Rohstoffen zu schaffen.
- Bei der E-Mobilität sollte die Unterscheidung zwischen **öffentlichem und privatem Laden** vereinfacht werden, indem der Schwerpunkt auf die tatsächlich an den Verkehr abgegebenen kWh gelegt wird (derzeitiger öffentlicher Lademodus), auch wenn sich das Ladegerät an einem halböffentlichen Standort befindet. Das entscheidende Kriterium hierfür sollte sein, dass die Anforderungen für öffentliche Ladeinfrastruktur erfüllt sind (z.B. Konformität mit Mess- und Eichrecht).
- Um die Integration des Verkehrs- und Energiesystems weiter zu stärken, sollten die Kriterien für die Nutzung von Strom aus erneuerbaren Energiequellen erweitert werden. Dies bedeutet, dass die geografischen Kriterien auf die Gebotszone ausgeweitet werden, während die zeitliche Korrelation an die Anforderungen für RFNBOs angeglichen werden sollte, d.h. eine monatliche Anpassung in der Hochlaufphase sollte möglich sein.
- Die **Binnenschifffahrt** sollte in die verpflichteten Volumen der Schifffahrt nach FuelEU Maritime einbezogen werden.
- Um sich auf eine Gesetzesänderung vorzubereiten, muss die Novelle mit ausreichendem Vorlauf, d.h. **mindestens drei Monate** vor Inkrafttreten der Änderungen, beschlossen werden.

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Shell’s Net Carbon Intensity

Also, in this document we may refer to Shell’s “Net Carbon Intensity” (NCI), which includes Shell’s carbon emissions from the production of our energy products, our suppliers’ carbon emissions in supplying energy for that production and our customers’ carbon emissions associated with their use of the energy products we sell. Shell’s NCI also includes the emissions associated with the production and use of energy products produced by others which Shell purchases for resale. Shell only controls its own emissions. The use of the terms Shell’s “Net Carbon Intensity” or NCI are for convenience only and not intended to suggest these emissions are those of Shell plc or its subsidiaries.

Shell’s netzero emissions target

Shell’s operating plan, outlook and budgets are forecasted for a ten-year period and are updated every year. They reflect the current economic environment and what we can reasonably expect to see over the next ten years. Accordingly, they reflect our Scope 1, Scope 2 and NCI targets over the next ten years. However, Shell’s operating plans cannot reflect our 2050 net-zero emissions target, as this target is currently outside our planning period. In the future, as society moves towards net-zero emissions, we expect Shell’s operating plans to reflect this movement. However, if society is not net zero in 2050, as of today, there would be significant risk that Shell may not meet this target.

Forward-Looking non-GAAP measures

This document may contain certain forward-looking non-GAAP measures such as [cash capital expenditure] and [divestments]. We are unable to provide a reconciliation of these forward-looking non-GAAP measures to the most comparable GAAP financial measures because certain information needed to reconcile those non-GAAP measures to the most comparable GAAP financial measures is dependent on future events some of which are outside the control of Shell, such as oil and gas prices, interest rates and exchange rates. Moreover, estimating such GAAP measures with the required precision necessary to provide a meaningful reconciliation is extremely difficult and could not be accomplished without unreasonable effort. Non-GAAP measures in respect of future periods which cannot be reconciled to the most comparable GAAP financial measure are calculated in a manner which is consistent with the accounting policies applied in Shell plc’s consolidated financial statements.

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