

# The document should be more focused and denser in information. Since the action is about the priority to “Diversify and strengthen energy options for sustainable transport” or renewable fuels, a lengthy analysis on bioenergy as such is not necessary in sections 1 and 2. It could perhaps be cut down and combined with section 3 on sectorial developments while including important statistics on bioenergy sustainability and economic opportunities from the last paragraph of section 2.

# “Barriers to address” is a crucial part of the document and thus should be a separate section with subheadings for separate barriers to simplify reading the document.

# The “Barriers to address” section misses a significant barrier: the standardisation and certification of fuels. The most sustainable way of getting fuels to the market seems to be blending obligations. For a smooth implementation of this and taking into account scientific progress in the field a rigid framework should be developed how to a) verify the compliance of new alternative fuels/blends to the requirements of OEMs; and b) verify the compliance of fuels to the technical/emission standards. A harmonised system allows different blends of fuels to be manufactured and marketed in all the Member States, i.e. larger markets, thus improving the business case for the producers and disabling market entry barriers. This should be reflected in a specific target to address the regulatory barriers in marketing alternative fuels.

# Another target may be to look into barriers that hamper the commercialisation of technologies and the scaling up of manufacturing. Analysing together with the industry the technology innovation curve and determining which sections need which types of support could be very beneficial in the long term.