ANALYTICAL NOTE ON SUBSIDIES

BLOOM

The Energy Taxation Directive: a keystone of the Green Deal

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KEY POINTS

- **Burning fossil fuels is the primary driver of climate change. Scientific consensus strongly urges policymakers to eliminate fossil fuel subsidies as a critical step in addressing global climate challenges.**

- **In 2019, the European Union launched the Green Deal, an ambitious plan to achieve carbon neutrality by 2050. In 2021, the European Commission proposed a revision of the Energy Taxation Directive (ETD) to support this objective.**

- **The Energy Taxation Directive represents a potential pivotal policy instrument for governments to use taxation strategically in combating climate change. By design, it could incentivize renewable energy development while disincentivizing fossil fuel consumption.**

- **Currently, the Danish presidency of the EU Council, is supporting the previous draft prepared by Hungary and Poland, which maintains complete tax exemptions for fossil fuels in aviation, maritime, and fishing sectors until at least 2035 - effectively prolonging a harmful fossil fuel subsidy.**

- **But unanimous agreement is required among EU Member States. EU Finance Ministers must discontinue fossil fuel subsidies and block this proposal, which could significantly undermine climate mitigation efforts, emission reduction targets, public finances and public health.**

- **Over the past few months, a series of increasingly alarming reports have highlighted the severe economic impacts of summer 2025's extreme weather events,[1] the importance of a healthy environment for maintaining competitiveness,[2] and the dire condition of the ocean.[3] Despite being the foundation of life, the ocean is in an appalling state, with acidification pushing us past the seventh planetary boundary.[4]**

- **Decision makers should be in no doubt: increasing competitiveness requires them to end climate inaction. It is now time for them to stop using citizens' money to undermine their future.**

1. BACKGROUND

The EU climate objectives fixed by the Green Deal

Launched by the European Commission in 2019, the Green Deal[5] is one of the most ambitious European initiatives with regard to the climate crisis. Its final goal is for the European Union to become the first neutral continent by 2050.

In this context, the European Commission has adopted a series of proposals to adapt the European Union's climate, energy, transport and taxation policies with a view of reducing net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels (as known as) «Fit for 55»[6] package.

In order to meet these targets, the European Commission highlights that all sectors need to contribute[7] to the fight against climate change, hence the necessity for the strategies to cover all these areas. As part of this package, the revision of the Energy Taxation Directive[8] ('**ETD**') plays a central role.[9]

The successful revision of this central piece of legislation has become even more important over the last year in view of the backlash against the Green Deal and other associated environmental regulations by the far-right.[10]

The ETD basically is the core of the European taxation system on electricity and energy products. The driving idea of this legislation is to have Member States imposing levels of taxation on energy products and electricity which cannot be less than the minimum levels of taxation prescribed by the directive.[11] Within this framework and under certain conditions, Member States are free to apply their own taxation levels, as long as those minimums are complied with.

It also contains a series of exemptions, either mandatory (which means that the Members States cannot apply any taxation on the in-scope products) or voluntary (which means that the Members States can apply total or partial tax exemptions or reductions, if they want to).

The current ETD: An outdated taxation regime

The ETD currently in force[12] clearly is outdated, as the European Commission admits.[13] Even if the initial text already mentioned that environmental protection requirements must be incorporated into European policies, one of the main criticisms today is that the directive is no longer aligned with European climate needs, policies, ambitions and commitments.

The tax rates established by the directive do not indeed take into account the energy content or environmental impact of each type of energy and no indexation mechanism is included which made the tax rates ineffective over time. The current system fails to facilitate and incentivize the use and development of sustainable fuels and energy-efficient solutions.

Since the taxation is based on volumes consumed, alternative fuels such as biofuels are treated worse than conventional fuels, with the result in fisheries that the most energy-intensive European vessels are the primary beneficiaries of this tax scheme.[14]

Finally, the legislation as it stands no longer guarantees the "*proper functioning of the internal market*" since a wide range of national exemptions and reductions de facto favour the use of fossil fuels in the EU.[15]

Consequently, **on 14 July 2021** the European Commission submitted a proposal for the amendment of the ETD,[16] which was the result of a thorough impact assessment reflecting the need to focus the revision on environmental objectives, emphasizing that taxation plays a direct role in supporting the ecological transition.

Following the evaluation of the directive in 2019, **the Council also concluded[17] that energy taxation could play an important role as one of the economic incentives driving a successful energy transition, inducing a reduction in greenhouse gas emissions and encouraging investments in energy savings while contributing to sustainable growth.**

Today, it is within the Council that the proposed revision of the Commission is the source of political tensions on certain crucial points.

2. ISSUES

Tax exemptions are fossil fuel subsidies

Under the ETD currently in force, certain sectors benefit from **a full taxation exemption** in the European Union. This is most notably the case for the **aviation and maritime sectors, including fishing.**[18]

Yet the globally agreed definition of subsidies in article 1 of the WTO agreement on subsidies and countervailing measures,[19] states:

> *"a subsidy shall be deemed to exist if:*
>
> *(a)(1) there is a financial contribution by a government or any public body within the territory of a Member (referred to in this Agreement as «government»), i.e. where:*
>
> > *(i) a government practice involves a direct transfer of funds (e.g. grants, loans, and equity infusion), potential direct transfers of funds or liabilities (e.g. loan guarantees);*
> >
> > *(ii) government revenue that is otherwise due is foregone or not collected (e.g. fiscal incentives such as tax credits);*
> >
> > *(iii) a government provides goods or services other than general infrastructure, or purchases goods;*
> >
> > *(iv) a government makes payments to a funding mechanism, or entrusts or directs a private body to carry out one or more of the type of functions illustrated in (i) to (iii) above which would normally be vested in the government and the practice, in no real sense, differs from practices normally followed by governments;*
>
> *or*
>
> *(a)(2) there is any form of income or price support in the sense of Article XVI of GATT 1994;*
>
> *and*
>
> *(b) a benefit is thereby conferred".*

A fuel tax exemption on fossil fuels used in a given sector is an indirect financial contribution from the public sector to a private party and is a fossil fuel subsidy.[20]

This situation has been pointed out as being a major issue[21] on numerous occasions and is one of the main reasons why the European Commission submitted its revision proposal, stating that it gives the wrong incentives, particularly given the role of these sectors in energy consumption and pollution.

Phasing out of fossil fuel subsidies to achieve the EU climate change objectives

To meet critical climate targets, scientists emphasize the urgent need to cease all new fossil fuel projects and simultaneously reform financial policies,[22] including eliminating fossil fuel subsidies.

During COP28,[23] parties to the Paris Agreement recognized the need to phase out inefficient fossil fuel subsidies and the new Commissioner in charge for Climate, Net Zero and Clean Growth, Mr. Wopke Hoekstra, highlighted in his hearing[24] in the European Parliament the vital importance of eliminating fossil fuel subsidies to be able to achieve climate change objectives.

The ocean, regulating the planetary climate and absorbing more than 30% of our carbon emissions,[25] is in a pitiful condition, with the latest report from the Copernicus program showing that **there is no longer any area of the ocean that is spared from the triple global crisis** (climate change, biodiversity loss and pollution).[26] The **exceedance of the 7th planetary boundary** (acidification of the ocean)[27] shows that the ocean is no longer able to guarantee the stability of our climate, and therefore of the entire global social and economic order.

On the eve of COP30 starting on 10th November 2025, and in view of the attitude of other States, the EU must reaffirm its position as climate leader. The EU cannot hope to be credible at the upcoming COP while sabotaging its own Green Deal.

The specific role of fossil fuel subsidies in fisheries

Since the early 1990s, the role of public subsidies in the overcapacity of fishing fleets and the overexploitation of world fish stocks has been clearly established by experts[28] and international organizations.[29] By increasing production capacity and rendering certain fleet segments seemingly profitable, public subsidies encourage fishers to continually increase their catches, regardless of the declining state of resources,[30] which would normally lead them to regulate their activity.

Given that overfishing has been identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)[31] as the leading cause of destruction of marine ecosystems over the past fifty years, there is an absolute urgency to eliminate so-called 'harmful' fishing subsidies and redirect this funding towards the social and ecological transition of the sector. In 2015, this led United Nations (UN) Member States to adopt Sustainable Development Goal 14.6,[32] which aims to ban public subsidies that encourage overcapacity, overfishing and illegal fishing. In June 2022, a first agreement banning certain fishing subsidies was also adopted at the World Trade Organization (WTO)[33] after more than twenty years of negotiations, entered into force on 15 September 2025.[34]

Despite these international commitments, the latest global estimates show that the global fishing sector received $35.4 billion in public subsidies in 2018,[35] over 60% of which encouraged overcapacity and overfishing, and $22,2 billion of which was fuel aid. According to the 2024 Annual Economic Report on the EU fishing fleet produced by the Scientific Technical Economic Committee (STECF), the EU fishing fleet has consumed 1.599 billion litres of fuel in 2022. Therefore, the EU fishing fleet has benefited from a fuel tax rebate ranging from 699.6 million euros.

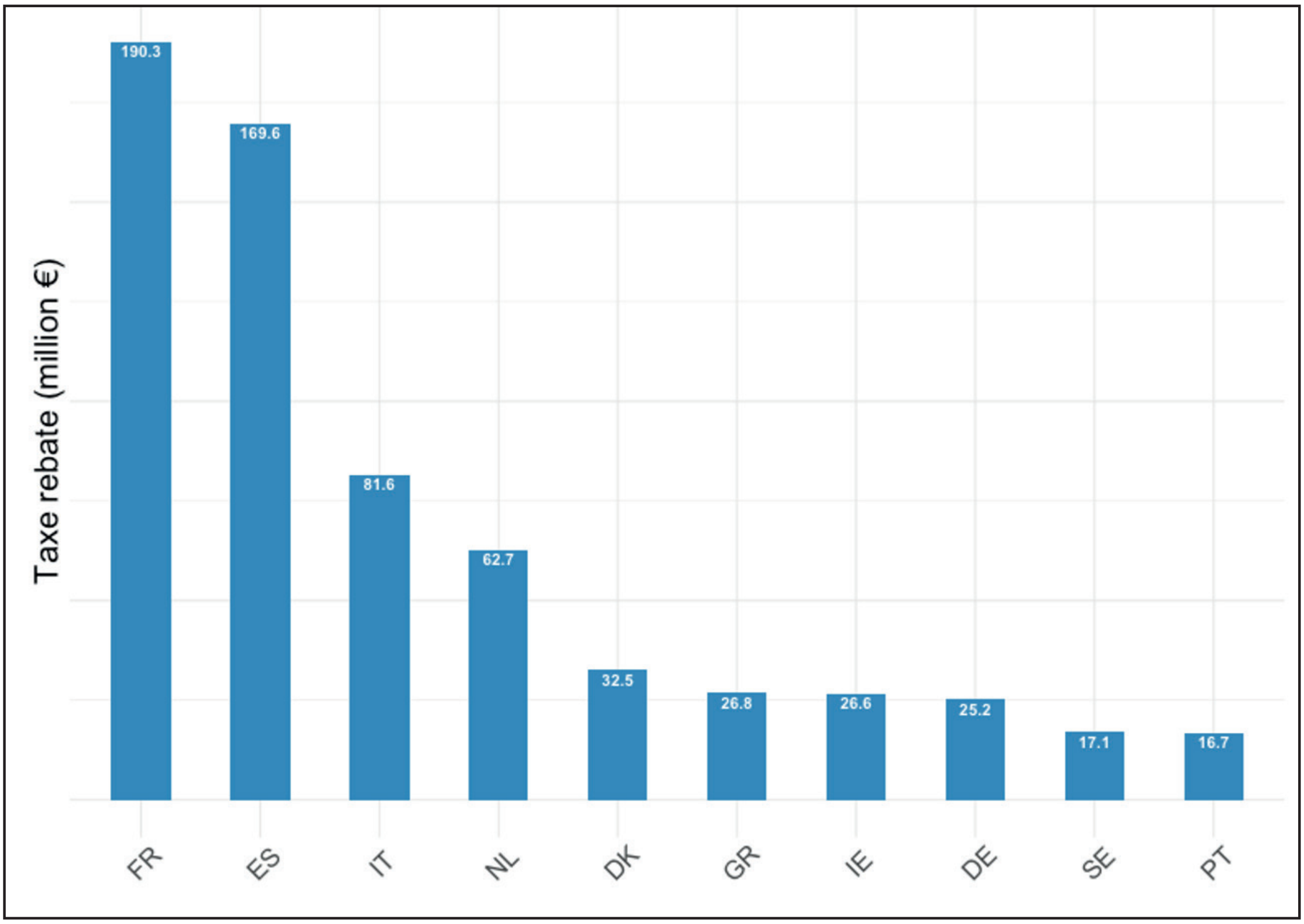

Figure 1: Top 10 EU national fishing fleets benefiting from the fuel tax exemption in 2022. Total fuel tax rebate is indicated in white (million euros) for each country. Source: data from the AER (CSTEP) and the Weekly oil bulletin

It is to be noted that the carbon footprint of the fishing sector is largely underestimated, given that the fishing sector's emissions are only calculated based on the amount of fuel burned at sea. **Carbon resuspension generated from scraping the seabed is not yet accounted for. A recent study estimates that bottom trawling is responsible for releasing around 370 million tonnes of CO_2 into the atmosphere every year, which represents twice the annual emissions from fuel combustion for the entire world fishing fleet.**[36]

As the amount of the tax rebate is proportional to the volume of fuel consumed, this scheme mainly benefits the most energy-hungry fishing vessels, i.e. those using active gear, which is also the most destructive of marine ecosystems.

Consequently, maintaining the total detaxation of fossil fuel subsidies used in fisheries in the revised ETD would maintain the most harmful and capacity enhancing fisheries subsidies in Europe despite repetitive calls from scientists[37] to eliminate those subsidies not only for the sake of climate change but also for the sake of the better fisheries management.

3. STATE OF PLAY

Tense political negotiations around fossil fuel subsidies

The proposal from the Commission sets out higher tax levels for fossil fuels, and lower levels for more sustainable products (based on their energy content and environmental impact), re-examines the possibility to grant exemptions and reductions, and introduces a yearly adaptation mechanism (indexation) of the taxation levels (which had not been updated since 2003) in order to reflect in time the evolution of their real value within the European market.

More specifically, this proposal introduces the phasing-out of the total and mandatory exemption for the aviation and maritime (including fishing) sectors, which is pointed out by the Commission as particularly problematic as being a measure that hinders achieving climate change objectives.

This specific aspect has been the source of political disagreements between Member States once discussions started in Council.

Current state of the negotiations

On September 2021, the proposal of the Commission was transmitted to the Council of the European Union and the Working Party on Tax Questions started its technical analysis.

Discussions took place under different presidencies of the Council and the Hungarian presidency (1st July 2024 – 31st December 2024) made some major changes to the Commission's initial text.

Even if some agreements have been reached, the fate of the aviation and maritime (including fishing) sectors has been one of the most divisive issues and was, according to the Hungarian presidency, the main blockage.

With regard to tax matters, the Council must reach unanimity[38] In this case, three Member States (Greece, Malta and Cyprus) have expressed their opposition to the elimination of the full tax exemption and insisted on a **permanent exemption**, even when the initial proposal of the Commission for the fisheries sector was a 0,036EUR/L tax rate.[39]

During the Czech Presidency, the Council agreed the possibility to include more flexibility in the legislation, watering down the initial objectives of the revision to avoid having special regimes and specific exemptions:

II. STATE OF PLAY

3. Technical analysis of the ETD proposal was launched in the Working Party on Tax Questions (Indirect Taxation - Excise Duties/Energy Taxation) (WPTQ) in September 2021. The Working Party on Tax Questions (High Level) (HLWP) discussed the file on several occasions.
4. On 17 June 2022, the Council (Ecofin) took note of the Presidency progress report on the ETD proposal. On 6 December 2022, the Council (Ecofin) held a policy debate on the ETD proposal and gave political guidance on the way forward. In general, the Ministers supported the more flexible Presidency approach and asked to find solutions to open issues. Taking into account the political guidance, technical analysis has continued.
5. Building on the progress made by the previous Presidencies, the Hungarian Presidency continued work on the revision of the ETD.

Being of the opinion that discussions on aviation and maritime sectors are blocking the adoption of the entire revised proposal, the Hungarian presidency pushed for a new version of the text which maintains the full exemption, with a review clause in 2035, arguing:[40]

12. Delegations have repeated their well know positions on some further issues. However, the current Presidency has not reopened the discussions on these issues as the Presidency considers that these issues have been discussed thoroughly during the previous Presidencies and the text reflects a fragile compromise.
13. For example some delegations would prefer to have the total exemption of agriculture, the tax reduction of commercial fuels and the exemption of households. At the same time, the majority of delegations would prefer not to provide these exemptions or reductions in the Directive. Furthermore, the compromise text already contains quite a few exemptions and reductions. Although the original goal of the revision of the Directive was to decrease the number of tax exemptions and reductions, delegations accept that different Member States have different specificities and priorities. Besides, these tax exemptions and reductions do not affect other Member States and are limited in time.

Accepting any and every exemption and reduction in taxation is not serving anymore the purposes of the revision of the ETD which were to create a more homogenous taxation framework and to make sure that taxation is used to achieve our climate change objectives.

Despite objections from some Member States, on maintaining the detaxation scheme for the aviation and maritime sectors, the Hungarian presidency included it anyway in its final proposal, which was presented at the ministerial level during a meeting of Economic and Financial Affairs Council (ECOFIN) on 10th December 2024, where Hungary hoped to reach a political agreement. But a few Member States, including France and The Netherlands spoke up to oppose the **Hungarian presidency** compromise text.

Technical discussions and negotiations continued under the Polish presidency (1st January 2025 – 30th June 2025), which also tried to reach an agreement and presented a further compromise text at the last meeting of the Working Party on Tax Questions, on 22nd May 2025.

But this text, while reiterating that taxation rules "*can also help tackle the climate and environmental-related challenges*",[41] suggests maintaining the tax exemptions for the aviation, maritime and fishing sectors, invoking the need "*to maintain the competitive position of Union companies*"[42] and proposes not to re-open negotiations on this before 2035.

This would concretely mean that these sectors would benefit from mandatory tax exemptions until at least 2035. However, given how much time this type of legislative negotiations require, taxation of these sectors would certainly not be implemented before 2037 or later.

This is a major step back, as the phasing-out of such exemptions was one of the main reasons why the Commission proposed a revision of the ETD.

Even the indexation mechanism, which was supposed to be the centerpiece of the revised taxation mechanism, has been heavily watered down. The minimum levels of taxation only have to be adapted once every three years and as of 1st January 2038 only, which leads to ineffective taxation levels.

The current Danish presidency: A pivotal moment

Since the Polish presidency did not manage to obtain an agreement on their compromise, the file has been referred to the Danish presidency (1st July 2025 – 31 December 2025) **who stated their intention to close it.**[43]

In the last available version of the proposed compromise, the Danish Presidency has maintained a weak approach. Fossil fuel tax exemptions for aviation, maritime transport and fisheries remain, as well as the weakened version of the indexation mechanism (with an even later starting point set at 1st January 2041).[44]

> While respecting existing international obligations and to maintain the competitive position of Union companies, Member States should apply an exemption of energy products and electricity supplied for air navigation and waterborne navigation in Union waters. It should still be possible for Member States to limit the exemptions to international or intra-Union transport or in accordance with bilateral agreements for air and sea transport between parties to the agreement.

The last technical meeting is scheduled for the 14th October and **the Danish presidency intends to put a compromise text to final vote on 13th November.** There is therefore a real risk of having then a locked-in tax exemption for at least another decade.

No obligation for the fishing sector to reduce its CO_2 emissions

Fossil fuels are by far the largest contributor to global climate change,[45] accounting for over 75 per cent of global greenhouse gas emissions, and the maritime and aviation sectors are not to be outdone, particularly as they together account for 27.9% of transport emissions in the European Union.

But unlike the aviation and maritime sectors and contrary to what the Hungarian Presidency claimed, the fishing sector is not subject to any binding targets or framework for reducing its CO_2 emissions (Table 1).

With regard to the mentioned ReFuelEU aviation and FuelEU maritime[46] initiatives, these new legislations mainly impose:

- **For the aviation sector:** fuel suppliers must guarantee that the fuel contains a minimal percentage of SAFs (Sustainable Aviation Fuel) (2% in 2025, 6% in 2030 and 70% in 2050) and of synthetic fuels (1.2% in 2030 and 35% in 2050); measures to combat harmful practices in the sector ('tankering practices'); the admission of new SAFs; or labelling obligations based on the environmental impact.
- **For the maritime sector:** maximum limits for the yearly average greenhouse gas intensity of the energy used but only applied to ships above 5,000 gross tonnage and starting with a 2% decrease by 2025 and reaching up an 80% by 2050; or measures to reduce air pollution in ports.

It appears that it mainly contains measures applying to infrastructure (quayside, airports), harmful practices or labelling, but not strong structural and financial incentives to rapidly decrease the environmental impact of these sectors.

The same is to be noted for the EU Emissions Trading System (ETS),[47] which covers only very recently (2024) maritime transport and still contains an exemption for the fishing sector.[48]

	ETD	ETS	FuelEU Maritime	ReFuelEU Aviation	CORSIA	IMO
Aviation	Not covered	Covered	Not covered	Covered	Covered	Not covered
Maritime	Not covered	Covered	Covered	Not relevant	Not relevant	Covered
Fishing	Not covered	Not covered	Not covered	Not relevant	Not relevant	Not covered

Table 1: Comparison of EU and international instruments promoting emissions' reduction and their applicability to aviation, maritime and fisheries sectors.

Fishing is the only sector not covered by any legislation. This situation is unacceptable, particularly when fishing has been recognized by IPBES experts as the leading cause of the destruction of ocean ecosystems and oceans are our main allies in the fight against climate change.

4. CONCLUSION

For over 10 years, BLOOM has been campaigning against fishing subsidies, which are internationally recognized as a key factor in the overcapacity and overexploitation of fish stocks.

Fuel subsidies, which include fuel tax exemptions, are a particularly harmful form of aid, since they support the fishing gears that consume the most energy and emit the most CO_2, and which destroy the most marine ecosystems, in particular through bottom trawling. Eliminating these financial incentives is therefore a strategic means of achieving both international climate objectives and sustainable fisheries management.

The EU fishing sector will remain competitive, if it phases out the most destructive and energy-intensive techniques (such as bottom trawling) and if public subsidies are redirected to support less impactful and less energy intensive fishing practices. If the status quo is maintained, it will incentivize the sector to continue the same trend of fossil fuel use, will slow down innovation towards carbon-free energy, and will maintain unsustainable pressure on the marine environment, the seabed and fish stocks.

The last EU Copernicus State of the Ocean Report paints a bleak picture of our ocean and specifically mentions bottom-trawling as a main stressor to biodiversity, representing a critical risk to countless species that may go extinct before even being identified.[49]

Eliminating fossil fuel subsidies gradually does not mean stopping all support to the sector. We call on Member States to organize a fair and just ecological and energy transition. Member states have the power and duty to make the best possible use of their citizens' money to guarantee their security, defend the general interest and best prepare the future for generations to come, who will need a stable climate and healthy ecosystems to thrive.

We urge them to show courage by making the only right choice: climate security.

5. OUR RECOMMENDATIONS

BLOOM calls on the European Council, the Commission, and the European Parliament to maintain a high level of ambition for energy taxation in the European Union. In order to avoid climate and economic collapse, taxation must be used to its full social, environmental and economic potentials.

We recommend to:

1. Tax energy products based on their carbon content, with higher taxes for products with more carbon such as fossil fuels.
2. Tax energy products based on their energy content (in gigajoules) and on their environmental performance.
3. Remove all incentives for the use of fossil fuels.
4. Remove fuel tax exemptions for the aviation, maritime and fishing sectors.
5. Introduce a yearly automatic indexation system to tax rates based on the annual official indexation levels to maintain an efficient and up to date taxation system.
6. Include the possibility for Member States to apply higher taxation levels to disincentivize environmentally harmful energy production or consumption.
7. Maintain a system of mandatory minimal taxation rates for Member States to ensure a level playing field in taxation throughout the EU.

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