

# Policy Recommendations

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## European natural gas network – single logistical facility

The entire natural gas network operated on the territory of the European Union, the EFTA and the European Economic Community is to be recognised as a single, closed logistical facility regarding **mass-balancing** of biomethane injected into the system.

The domestic natural gas network operated on the territory of the Member State is to be recognised as a single, closed logistical facility regarding **mass-balancing** of biomethane injected into the system.

## National biomethane registries

National governments are recommended to take measures towards establishing national biomethane registries in every member state and entrusting them with the task of mass-balancing.

The European Union should encourage national governments to establish national biomethane registries in every member state producing or importing biomethane.

The BIOSURF consortium supports the application of the voluntary scheme named “ERGaR RED” developed by the ERGaR aisbl association for recognition by the European Commission under the RED.



**The functions of BGoO's must include qualification for counting towards EU and national renewable energy and GHG emission reduction targets.**

The value of the BGoO's must be increased and secured through having them **accepted by the governments of the importing countries** for

- meeting overall renewable energy targets,
- meeting specific energy targets of member states,
- inclusion into renewable energy statistics and
- GHG emission mitigation reporting.

As governing principle **BGoO's should be taken into count in the member state where their consumption takes place.**

The European Union should apply the same sustainability criteria for all usages of biomethane (transportation, electricity, heating and cooling), specifically 70% GHG emission reduction compared to fossil fuel comparator (FFC).

The FFC value for heating application should correspond to the heating fuel mix, rather than limited to the GHG emission by natural gas.

## Digestion of main crops suitable for food/feed production

The legislators should refrain from imposing **new** restrictions on processing sustainable produced energy crops for the purpose of producing biomethane in Europe.

*If produced in a sustainable manner, energy crops might help to enable the use of untapped potentials of biogenic waste and residues for anaerobic digestion. A general prohibition or substantial limitation for processing energy crops in biogas/biomethane installations could therefore hamper the use of important resources.*

## Cover crops

Cover crops with high starch content should be recognised among the raw materials (substrates) allowed for producing advanced biofuels.

The GHG emission calculation methodology should be adjusted to reflect the fact, that cover crops are secondary crops.



## Power-to-Methane

Scientifically based classification of methane produced under different Power-to-Gas pathways (differentiating between the sources of electricity and the sources of carbon dioxide) is to be elaborated.

*For this purpose, a complex research is needed differentiating between:*

- *renewable biomethane from renewable electricity and biogenic carbon from anaerobic digestion,*
- *renewable biomethane from renewable electricity and biogenic carbon from solid biomass,*
- *renewable methane produced from renewable electricity and fossil carbon.*

## Source separated waste collection

Source separated biowaste collection should be made mandatory in the European Union, preferably together with combination of energetic and material recovery – anaerobic digestion or composting with usage of produced digestate and/or compost as fertilizer).

Land-filling and incineration of biodegradable organic waste is to be prohibited (or strictly limited).

## Organic waste incineration

The thermal energy generated from biowaste incineration shall not be considered as renewable.

Burning recyclable and reusable materials goes against resource efficiency and is contradictory to the waste hierarchy as set in Directive 2008/98/EC on waste. Incinerating biowaste is a missed opportunity for Europe's circular economy as valuable nutrients and carbon are lost, which could otherwise be utilised for agriculture if digested.

Preferential access to the natural gas grid is to be guaranteed in every EU member state. The costs of establishing the grid connection to be shared between the distribution (transmission) network operator and the biomethane producers on a regulated basis.

These costs of TSO's and DSO's to be acknowledged when calculating and approving the grid service fees.

## Dedicated customs identification number

Dedicated customs identification number for biomethane is needed to enable exact counting, proper statistics and proper identification of imported consignments.

- CN code 2711 19 00 for liquefied biomethane
- CN code 2711 29 00 for gaseous biomethane

## GHG emission reduction by using digestate as fertiliser

The GHG emission savings resulting from the avoidance (substitution) of the production and use of industrial fertilisers in case digestate is applied on cultivated land is to be recognised while calculating the GHG emission reduction effect of biomethane.

## **Averaging GHG emission numbers of different substrates**

The limitation which does not allow averaging GHG emission numbers of different substrates processed in an AD plant is to be lifted. The averaging should be allowed based on share of each substrate in the produced total energy taking into consideration the specific biogas yields.

## **Averaging GHG emission numbers of gaseous fuel blend components**

Averaging of GHG emission numbers of components of gaseous fuel blends (blends of natural gas and biomethane marketed either in compressed or liquified form) is to be allowed.

*The attractive GHG emission numbers of the natural gas – biomethane blends would increase the attractiveness of these fuels for the consumers.*



## **Tax exemption for biomethane as biofuel**

As a general rule, the State Aid Guidelines should allow national governments to grant tax exemption or beneficial tax treatment - on long-term basis - for biomethane used as transportation fuel as compared with natural gas used for the same purpose.

## **No retroactive changes in support systems**

The European Union legislation should not allow national governments to introduce retroactive changes in national support systems, unless adaptations are necessary to comply with EU State Aid rules.

**Comments and suggestions are  
most welcome !**

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