

# Policy Recommendations

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## What To Address??

- 1) *Biomethane Trade*
- 2) *Sustainable Raw Material Supplies*
- 3) *Organic Waste Utilisation*
- 4) *Legal And Administrative Measures*

# 1. Biomethane Trade

## 1.1 Domestic natural gas network – single logistical facility

### *Recommendation:*

- 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.

## 1.2. National biomethane registries

### *Recommendation:*

- National governments are recommended to take measures towards establishing national biomethane registries in every member state.

## 1.3. Biomethane Guarantees of Origin (BGoO)

### *Recommendation:*

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

## 2. Sustainable Raw Material Supplies

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

#### *Recommendation:*

- National governments should refrain from imposing new restrictions on processing energy crops for the purpose of producing biomethane in Europe.

### 2.2. Cover Crops

#### *Recommendation:*

- 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.

### 2.3. Sustainability Requirements

#### *Recommendation:*

- The EU Member States 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.



### 2.4. Relief for small scale biomethane producing installations

#### *Recommendation:*

- Small scale biogas producing installations (below 50 GWh/year capacity) should be released from the commitment on meeting sustainability requirements.

### 2.5. Power-to-Methane

#### ***Recommendation:***

- 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.

### 3.1. Source separated waste collection

#### *Recommendation:*

- Source separated biowaste collection to be made mandatory by the national Governments , 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).

### 3.2. Organic Waste Incineration

#### *Recommendation:*

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

## 4. Legal And Administrative Measures

### 4.1. Preferential access to natural gas network

#### *Recommendation:*

- Preferential access to the natural gas grid is to be guaranteed in every EU member state. The costs of establishing connection to the natural gas pipeline system to be shared between the distribution (transmission) network operator and the biomethane producers on the following basis.
  - German proposal: 75:25%
  - French proposal: 40:60%
  - Austrian proposal: grid access is for free for 15 linear meters  $m^{-3} h^{-1}$ . For grid distances above this formula, plant operators shall pay 50 % of costs.

## 4. Legal And Administrative Measures

### 4.2. GHG emission reduction by using digestate as fertiliser

#### ***Recommendation:***

- 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.

### 4.3. Averaging GHG emission numbers of different substrates

#### *Recommendation:*

- 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.

### 4.4. Averaging GHG emission numbers of gaseous fuel blend components

#### *Recommendation:*

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



### 4.5. Tax exemption for biomethane as biofuel

#### ***Recommendation:***

- National Governments should grant beneficial tax treatment of biomethane used as transportation fuel (as compared with natural gas used for the same purpose) on long-term basis.

### 4.6. No retroactive changes in support systems

#### ***Recommendation:***

- National Governments should not introduce retroactive changes in national support systems, unless adaptations are necessary to comply with EU State Aid rules.

# Thank You All

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