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Sustainability recommendations on biomass and biogas in electricity and heating - EBA comments

Dear DG energy,

European Biogas Association (EBA) has got hold of a recent draft of the sustainability recommendations for biomass and biogas which shall be published before the EU's summer break. We support the Commission's efforts to promote the smooth functioning of the internal market through aligned national sustainability criteria. This is crucial for the development of biogas' and biomethane's cross-border trade in Europe. Biomethane has a huge potential to contribute to Europe's energy security by replacing the imported natural gas from Russia and other politically unstable regions.

As it is expected that Member States will consequently adopt the updated GHG emission accounting methodology, it is very crucial that the new advanced feedstock such as grass silage and straw which are increasingly used across Europe, have their own pathways. Grasses and other alternative energy crops such as catch crops have significantly different emission levels when compared to maize and therefore they should not merely be included in the maize pathway.

On the positive side, we are happy to notice that co-digestion of different substrates – that is very common at biogas plants – has been taken into account and a formula for counting the emissions has been provided.

We are also, once again, surprised and concerned about the default values given to biogas from wet manure: they are significantly higher than in JEC's well-to wheel analysis from April 2014. We would like to know the reason for that and understand why the values of JEC that are continuously revised and updated are not used in the legislative documents of the European Commission.

Moreover, we would like to point out that similarly to the electricity sector, also in the heating sector the current energy mix should be taken into account: instead of comparing biogas to 100% natural gas, a more realistic approach would be a mix of 30% oil and 70% natural gas. Oil and coal are still significant energy sources for heating in numerous Member States. Biomethane should not be

compared to natural gas in the transport sector either, as CNG suppliers are not subject to the 10% renewable fuel obligation of the Renewable Energy Directive.

For any further information, please do not hesitate to contact us.

Yours sincerely,



Jan Štambaský
President
European Biogas Association