

## Deployment of alternative fuels infrastructure – EBA’s comments ahead of the TRAN committee vote

### Appreciation

European Biogas Association (EBA) warmly welcomed the European Commission’s Clean Power for Transport Package. One of the biggest hurdles on the way to the large-scale deployment of biomethane (i.e. upgraded biogas) in the transport sector has been the insufficient infrastructure, besides inadequate support schemes and the modest level of cross-border trade. While increasing the number of LNG and CNG refuelling points, the proposal thus facilitates also the broader transport use of biomethane, a resource-efficient and renewable fuel than can be used in its pure form or blended at any proportion with its fossil counterpart, natural gas. In addition to the enormously reduced particulate matter (<PM10) and NO<sub>x</sub> emissions reached when gasoline and diesel are switched to biomethane, also notable CO<sub>2</sub> emission savings are provided: biomethane from organic waste, manure, catch crops and straw provides CO<sub>2</sub> emission savings of around 90% (Environment Agency Austria) and furthermore, the valuable by-product, digestate, is able to replace mineral fertilisers reducing thus emissions caused by production and use of such fertilisers.

The proposal thus supports biomethane’s further growth in the transport sector: in Sweden, more than 60% of the gas used in transport is covered by biomethane and in Germany, the share more than doubled within last year from 6 to over 15%.

### Hurdles to be removed

EBA would like to draw attention to the incoherent categorisation of biomethane in the documents of European institutions: in some documents biomethane is classified as a biofuel whereas in others it is included into the term ‘natural gas’. Also in the proposal on the deployment of alternative fuels infrastructure, biomethane is included into the category ‘natural gas’. Thanks to the similar methane content of the fuels, biomethane profits from CNG’s (and in liquefied form LNG’s) infrastructure. However, **biomethane as a biofuel with high substrate flexibility should be mentioned explicitly as its own: natural gas and biomethane**. Having regard to the tabled amendments, it seems that MEPs have had only natural gas in mind when the amendments were written: amendment 339 is justified by stating: ‘Natural gas is very suitable as a fuel in some regions, but not in other regions...’ In fact, biomethane can be produced, thanks to its substrate flexibility, all over Europe. Especially in amendments 78-82 biomethane should be mentioned expressly. Also for example the amendments 317 and 331 seem to forget that biomethane is ‘included’ in CNG/LNG.

Instead, **we strongly support the wording of amendment no. 137 for Recital 22:**

(22) LNG **and liquefied biomethane** might also offer a cost-efficient technology for heavy duty vehicles to meet the stringent pollutant emission limits of Euro VI standards.

An appropriate option would be to abandon the natural gas based glossary in the proposal with acronyms such as LNG and CNG and instead replace them with technology neutral acronyms MGV (methane gas vehicle), CMG (compressed methane gas) and LMG (liquefied methane gas). An increasing amount of consumers wish to move from crude oil based fuels to renewable fuels and therefore, the use of fossil names for renewable energy products in the proposal is not appropriate. It is essential though that technology specific glossary is further used at filling stations to inform consumers and to give them a choice between fossil and renewable gas products.

On a more general level **we are in favour of the amendment no. 92 for Recital 8**, as also the amount of gas driven vehicles should be significantly increased alongside with the filling stations:

**(8) It is also vital to develop incentive schemes for the purchase of the corresponding vehicles in parallel with European and national support measures for the area-wide deployment of alternative fuels infrastructure.** Support measures for alternative fuels infrastructure shall be implemented in compliance with the State aid rules contained in TFEU.

Furthermore, it should be ensured that there is a sufficient number of CNG filling stations in the cities that have more than a determinate number of population (e.g. more than 100 000) as proposed by amendment no. 129 for Recital 20:

**(20) Member States, in close cooperation with regional and local authorities and with the industry concerned**, should ensure that publicly accessible infrastructure for the supply of gaseous Compressed Natural Gas (CNG) to motor vehicles is built up, with distances between refuelling points allowing area covering circulation of CNG vehicles across the Union, as well as **guarantee a minimum** number of refuelling points **in cities with more than a determinate number of population**.

### Conclusions

Supporting the extension of compressed and liquefied methane gas infrastructure is a no-regret solution since, in addition to natural gas, also other alternative and renewable fuels such as biomethane, syngas and power-to-gas fuel profit from the same infrastructure. EBA however calls on the MEPs to bear in mind that biomethane, unlike natural gas, is renewable, can be produced domestically and is moreover the first broadly available second generation biofuel.

ANNEX: EBA's BIOMETHANE fact sheet