

To the attention of Gita Bergere
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Sent via email

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Dear Gita Bergere,

With regard to the meeting of the Eurostat Statistical Working Group scheduled for 14/15 May 2018 we would like to draw your attention to the increasing importance of tracking biomethane¹ in the European statistics.

A major structural change is on its way in the biogas industry, biomethane becomes the primary final product instead of electricity. Raw biogas is traditionally used for local generation of electricity and heat, it is a non-standardised material which cannot be feasibly transported on long distances. On the other hand, biomethane meets the quality standards of natural gas and can be distributed to any consumer through the domestic and European natural gas networks. Biomethane can be blended with natural gas without limitation and can be used everywhere in Europe replacing natural gas (as fuel for vehicles, electricity generation, heating and raw material for the chemical industry.

In 2016 already 21% of all biogas projects in the EU were equipped with upgrading facilities to produce biomethane instead of electricity. At the end of 2016 there were 503 biomethane producing installations in 15 European countries. The recent study by Ecofys for the Gas for Climate consortium² concluded that by 2050 the volume of biomethane produced in Europe could reach 106 billion m³ with a value in the range of 53 billion EUR

The establishment of the common European biomethane market is required for enabling dynamic growth in biomethane investment activity. One of the important administrative measures towards this aim is that dedicated identification numbers are allocated to biomethane within the Regulation on the tariff and statistical nomenclature and on the common customs tariffs (2658/87).

² "How gas can help to achieve the Paris Agreement target in an affordable way" by Ecofys https://www.gasforclimate2050.eu/files/files/Ecofys_Gas_for_Climate_Feb2018.pdf



¹ According to EN 16723 – Part 1: "biomethane is gas comprising principally methane, obtained from either upgrading of biogas or methanation of biosyngas"



We consider logical that biomethane is classified according to its chemical properties and physical state in subheadings 2711.19 (Petroleum gases and other gaseous hydrocarbons, <u>liquefied</u>) resp. 2711.29 (Petroleum gases and other gaseous hydrocarbons, in <u>gaseous state</u>). Correspondingly we suggest the introduction of two sub-categories:

CN code 2711 19 00 10 for liquefied biomethane CN code 2711 29 00 10 for gaseous biomethane

The dedicated customs identification numbers for biomethane are needed to enable exact statistical recording and proper identification of imported consignments.

We suggest creating an Explanatory Note for the Combined Nomenclature for clarifying the classification of biomethane (and its distinction from biogas) in the EU.

Biomethane (and advanced biomethane) transported through the natural gas pipeline network and used as biofuel upon withdrawal from the pipelines needs special attention in view of the requirements of the Renewable Energy Directive and other related legislative documents. Providing the possibility to account injected biomethane (and advanced biomethane) for meeting biofuel targets in Eurostat's SHARES would substantially contribute to the expanded deployment of biomethane in transportation.

We are at your disposal in case you wish to exchange views on these issues and we are ready to contribute to elaborating the solutions.

With best regards

Franz Kirchmeyr Vice President

Attila Kovacs Board Member