



Law

Feedback from: Austrian Compost & Biogas Association

Feedback reference

F3242120

Submitted on

12 April 2022

Submitted by

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User type

Company/business organisation

Organisation

Austrian Compost & Biogas Association

Organisation size

Micro (1 to 9 employees)

Country of origin

Austria

Initiative

Gas networks – revision of EU rules on market access ([/info/law/better-regulation/have-your-say/initiatives/12911-Gas-networks-revision-of-EU-rules-on-market-access_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12911-Gas-networks-revision-of-EU-rules-on-market-access_en))

There needs to be an own definition for biogas from anaerobic digestion and thermochemical conversion. Including in its definition also other low carbon gases and mixing it with natural gas can only be seen as a very bad approach and is not in line with definitions of RED Article 28 and contradicts stipulations in article 19 guarantees of origin for renewable energies. Therefore, set a clear definition for renewable gases coming from anaerobic digestion, gasification and renewable hydrogen. Additionally biogas from anaerobic digestion and gasification needs to become an own subcategory within nomenclature regulation (2010/861/EU). Liquefied biomethane should become CN 2711 19 00, gaseous biomethane should become CN 2711 29 00.

Although EU has a climate law which requires a decrease of CO₂ of 55 % until 2030, within the gaspackage only very weak statutory provisions can be found. A clear binding target for renewable gases coming from anaerobic digestion and gasification of 35 billion m³ methane equivalent until 2030 is necessary. This must also include penalties if not reached by market participants. A target for renewable hydrogen has to be set on top of it.

To stimulate the market development of renewable gases a priority grid access has to be obligatory. This shall include the grid access free of charge (for example: limited to 60 running meter per m³ methane capacity), no costs for possibly needed reverse flow devices to make sure that injection at full load capacity can be done the whole year and no costs for measurement devices and possibly odourisation devices costs such as already done in Austria.

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