



October 1, 2018

Dear Members of the European Parliament,

Dear Ministers,

We, the signatories of this letter, a group of associations, representing major companies in the energy and transport sectors, fully support the EU's long-term decarbonisation goals, including the objective of reducing greenhouse gas emissions from transport by at least 60% by 2050. We contribute to these goals by investing in alternative transport technologies and fuels and we are ready to continue and even step up our activities provided that an appropriate regulatory framework is put in place.

Such a framework should – instead of picking winners – create a level playing field to allow for a fair competition among different clean mobility solutions. A variety of alternative fuels and powertrains are necessary to address the challenges in the transport sector, including natural and renewable gas.

More than 1.3 million natural gas vehicles are circulating on Europe's roads today, reducing not only CO₂ but also air pollutants and noise compared with conventional vehicles in a very cost-effective way. The sector dimension is the result of a well-proven European excellence, with know-how and products exported all over the world.

At the same time, the gas mix is becoming greener. A share of 30% of renewable gas to be used in gas vehicles is expected by 2030. Renewable gas is a carbon-neutral fuel as the CO₂ emissions released during combustion are equivalent to those captured during the biomass life-time. Biomethane is also an excellent example of the circular economy since biowaste can be used to produce the fuel. Synthetic gas produced with excess electricity from renewable sources via power-to-gas processes does not only decarbonize the transport sector, but also helps to integrate intermittent renewables in the energy system.

Regrettably, the potential of renewable gas is not considered when looking at tailpipe emissions only. We deem it therefore fundamental to consider the entire fuel chain including extraction, production, transport and use of the fuel or electricity in order to provide a more realistic comparison of different options. A well-to-wheel approach is indispensable to account adequately for the CO₂ benefits of renewable gas, and must be introduced as soon as possible.

No time should be lost to establish a well-to-wheel approach! While preparing the shift towards this new methodology, it is necessary to recognize the value of biomethane in the process of decarbonising transport, and to implement in parallel a Carbon Correction Factor (CCF) as an interim solution in order to create the right conditions from the start.

Susanna Pfluger
Secretary General
European Biogas Association

Boyana Achowski
Secretary General
Gas Infrastructure Europe

Beate Raabe
Secretary General
Eurogas

Andrea Gerini
Secretary General
NGVA Europe