

EBA response to the consultation on Inception Impact Assessment on methane emissions in the oil, gas and coal sectors

EBA welcomes the European Commission's efforts to reduce methane emissions in order to achieve the required GHG emissions savings by 2030 and 2050. As the EU's Methane Strategy indicates, anaerobic digestion (AD) plays a major role preventing these emissions from agriculture, waste management and also the energy sector. The biogas industry is therefore a large net reducer of methane emissions per se and methane emissions related to AD itself are minimal (according to voluntary or mandatory measurements made in several European countries), nevertheless they must be avoided.

The OGMP initiative developed for the oil and gas industry is difficult to adapt to the biogas sector that includes mostly small farm-based plants (that are there to *prevent* methane emissions). We are in favour of a common initiative also in the biogas sector but it would need to be dedicated to the sector. We therefore suggest the following model for a European voluntary scheme, based on the existing national schemes, to minimise methane emission from biogas, reasonably adapted to the size of the plants (less obligations for smaller plants):

- Step 1: Operators required to have a plant description with critical control points, which can serve as a check list in regular rounds on the critical points.
- Step 2: Detection of leaks via in situ gas sensor or imaging technology across entire site (e.g. handheld, vehicle).
- Step 3: Measurement and quantification. The measurement frequency should be established depending on the size of the plant.
- Step 4: Short-term (2025) and long-term (2040) reduction targets aiming at driving down the emissions to a certain level set by the voluntary schemes.

A central European body should be established to collect and aggregate data and set targets with linked certification schemes.

However, before such scheme is established, the following preparatory work should be carried out:

- EU funding allocated to a follow-up of the EvEmBi project to investigate BAT especially on quantitative measurements and to further synchronise the already existing (national) voluntary schemes (expected 2-3 years).
- In the meantime, EBA will collect data from voluntary schemes around the EU and report to the Commission.

Finally, we want to remind and underline the importance of AD helping to avoid emissions of several key emitting sectors (agriculture, waste management and energy) as stated in the EU Methane Strategy (2020) and the role of digestate in substitution of fertilizers produced from fossil resources. The biogas sector is still young and needs political support to realise the full potential of its environmental benefits.

With regard to the policy options, we opt for 2.b: Sector coverage including upstream, midstream and downstream gas and oil (OGMP 2.0).