

RECOMMENDATIONS

Fuel EU Maritime Regulation

8 November 2021

EBA position on the European Commission's proposal for a Fuel EU Maritime Regulation

The European Biogas Association (EBA) warmly welcomes the European Commission's ambitions to increase the share of renewable fuels in the maritime transport fuel mix, thereby strengthening the measures taken at the international level by IMO. **The proposed Regulation rightfully establishes a level-playing field between different fuels by finally introducing a well-to-wake approach** that *'provides a more complete picture of the environmental performance of the various energy sources'* (Recital 16). This exemplary basis to calculate true GHG emissions should be immediately extended also to the road transport sector.

Given that the Regulation proposes to calculate the GHG emissions on a well-to-wake basis, it is difficult to understand why electricity shall still have a zero-emission factor (Annex I). This is not technology neutral or in line with the current GHG balance of the European electricity supply: **over 40% of the EU's electricity is still sourced from fossil energy and thus far way from reaching zero GHG emissions, even more so if a full life-cycle approach is taken into account. Therefore, we call the EU institutions for correcting this biased element in the Annex distorting science-based emissions calculations: the emissions of electric maritime mobility must be likewise calculated on a well-to-wake basis.**

Bio-LNG is certainly the most viable fuel helping to decarbonize the maritime and heavy-duty road transport sectors. It can rely on production capacity of biomethane that is available and scalable today all over Europe (sustainable potential to replace 30-40% of natural gas consumption in Europe), it can be used in LNG engines without any modification – at the moment, 1/3 of the vessels use LNG as a fuel – and transported, stored and bunkered in ports utilising existing LNG infrastructure. Finally, it comes along with multiple benefits to our climate, environment and society reducing GHG emissions by up to about 92% compared with fossil LNG in the combustion cycle and improving air quality with virtually no SOx while dramatically limiting emissions of NOx. **Bio-LNG has a long-term role to play in the European energy supply and the value of its production, increasing physical blending with fossil LNG and consumption should be acknowledged and supported by the EU institutions on a level-playing field with electricity and hydrogen.**

As the proposal states, it is important that there will be a basket of measures supporting the decarbonization of the shipping sector. **Furthermore, the legislative framework must be coherent.** It is of utmost importance that the revision of the RED including the Annex IX as well as the introduction of the implementing act on voluntary schemes will be designed suitable also for gaseous fuels. New sustainable biogas feedstock, such as sequential silage cropping, must be added to the Part A of Annex IX in order to avoid any capping of renewable gas potential in Europe. Tracking and tracing of biomethane should be tailor-made for gaseous fuels. RED III should propose in clear terms a Guarantee of Origin system resulting in certificates that could be traded separately from the physical gas molecules – across all member states of the EU – as soon as the renewable methane is either liquified or injected in a grid. Finally, also the European taxonomy under the Sustainable Finance framework should be supporting the cleanest fuels, like bio-LNG, in a technology-neutral manner, based on well-to-wake emissions.

Finally, we request that MRV requirements for all energy carriers are commensurate with the administrative burden and scientific rigor reflected in the upcoming proposal on Methane fugitive emissions. For instance, if the said proposal introduces full lifecycle requirements for gaseous fuels, such requirements should also be introduced for liquid fuels.

Contact

Susanna Pflüger – pflugger@europeanbiogas.eu

Harmen Dekker – dekker@europeanbiogas.eu

About the EBA

The **European Biogas Association** is the voice of renewable gas in Europe since 2009. EBA advocates the recognition of biomethane and other renewable gases as sustainable, on demand and flexible energy sources that provide multiple knock-on socio-economic and environmental benefits. Supported by its members, EBA is committed to work with European institutions, industry, agricultural partners, NGOs and academia to develop policies which can enable the large-scale deployment of renewable gases and organic fertilisers throughout Europe, supported by transparent, well-established sustainability certification bodies to ensure that sustainability remains at the core of the industry. The association counts today on a well-established network of over 200 national organisations, scientific institutes, and companies from Europe and beyond.