

RECOMMENDATIONS

CO2 standards for cars and vans

8 November 2021

EBA position on the European Commission's proposal revising CO2 standards for cars and vans

The European Biogas Association (EBA) and its 200 members representing over 7000 stakeholders across the fully supply chain in Europe welcome the European Commission's strengthened focus aiming to finally achieve required emissions savings also in the transport sector. We however **do not agree with the approach favouring only certain technologies based merely on vehicles' combustion emissions**. This approach is not in line with the European Commission's principles of a just transition, technology neutrality and the subsidiarity principle allowing the Member States to decide on their energy mix (as long as the required emissions savings are reached). Furthermore, the tailpipe approach is not in line with other EU legislation supporting defossilisation, i.e. the RED and the ETD. If no corresponding vehicles will be available after 2035, supportive legislation for clean fuels does not lead to their uptake; on the contrary, such conflicting framework would jeopardize the EU's objectives to decrease the emissions of the transport sector. **There are however also easy solutions available which can accelerate the total decarbonization of EU mobility.**

Biomethane and e-methane can be used as a renewable fuel, helping us to achieve zero or even negative levels of CO2 emissions¹. It also enables the development of local circular economies because it can be generated using locally-produced organic residues and waste streams. Additionally, digestate, a nutrient-rich by-product obtained during the production of this renewable fuel, can be used as biofertiliser to nurture our soils. **Biomethane is available right here and now, across Europe, and its production levels can be easily scaled up to ensure ample future supply.** Finally, biomethane is among the most affordable advanced biofuels and CNG vehicles allow also citizens with low and middle income to have access to low-carbon mobility.

We call the EU institutions to take into account the recommendations we put forward in our position paper on Smart CO2 Standards for Negative Emissions Mobility²:

1. Recognise the emissions reduction of biomethane mobility within the CO2 standards. If no crediting scheme or a carbon correction factor can be introduced, manufacturers of the most efficient CNG vehicles – able to reach emissions savings beyond zero, i.e. negative emissions mobility – should receive derogations in line with the Article 10. This should be possible at least in Member States that lay down a clear decarbonization pathway committed to reach a minimum 40% share of renewable gas in the transport mix by 2030.
2. Harmonise the approach to CO2 emissions in all EU transport policies enabling genuinely carbon neutral and cost-effective solutions to reduce CO2 emissions in transport à switch quickly from tank-to-wheel (TtW) to a more comprehensive and science-based Well-to-Wheel (WtW) approach and adopt as soon as possible a full life-cycle approach.
3. Replace fossil fuels with advanced biofuels. Require a growing share of sustainably produced biofuels and renewable gases in mobility fuel use. Introduce a binding obligation for the EU to steadily

¹ Frontier Economics (2021): CO2 Emission Abatement Costs of Gas Mobility and other Road Transport Options: <https://www.ngva.eu/wp-content/uploads/2021/04/Frontier-Economics-Study-for-NGVA-Carbon-abatement-costs-260421-stc.pdf>

² <https://www.europeanbiogas.eu/wp-content/uploads/2021/06/SMART-CO2-STANDARDS-FOR-NEGATIVE-EMISSIONS-MOBILITY.pdf>

increase the share of sustainably produced biofuels and renewable gases in transport, reaching 50% in ICE and hybrid vehicles by 2030 and 100% by 2050.

The share of biomethane is rapidly increasing in the transport gas mix in Europe. It is already close to 100% in the Nordic countries and the Netherlands and if reaching EU-wide the realistic share of 40% by 2030, gas mobility would help the EU to reach the required savings of -55% by 2030. Several Member States underline the importance of bio-CNG mobility among their future portfolio of fuels helping them to reach climate targets that are partially more stringent than at the EU level (e.g. Finland, Sweden). **The European Institutions should not water down the national ambition and forbid sales of new CNG vehicles that can reach cleaner mobility than any electric or fuel cell vehicle.** The current approach of the European Commission would also create a too high dependence on a single technology accompanied by high risks: the need to produce and recycle an enormous quantity of batteries, this without full clarity on its impact on environment, costs and European industry. Biomethane is not only a domestic fuel, but often even a local fuel. It fully supports the EU's efforts to increase energy self-sufficiency.

Biomethane is a no-regret solution and its positive externalities to our climate and society are well known.

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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.