

## RECOMMENDATIONS

## **EU Environmental & Climate Taxonomy**

2 May 2023

# **Tuning in the Taxonomy with the REPowerEU**

The European Commission's REPowerEU strategy sets the path to end Europe's problematic dependency on fossil fuels, and in particular Russian fossil gas. The acceleration of biomethane deployment to achieve 35 bcm a year by 2030, becomes paramount. To date, the EU Taxonomy Climate Delegated Act (CDA) includes intricate screening criteria for biogas and biomethane. The current update of the CDA and the new environmental criteria represent a solid opportunity to drive investment in the biogas and biomethane sector and support their growth. From a recent poll within the European Biogas Association (EBA) membership, companies investing in biogas and biomethane indicated that compliance with the EU Taxonomy is key to leverage green investments, and for this reason they are striving to meet the criteria. In parallel, difficulties in the implementation of the existing screening criteria have also been identified.

# What are the current inconsistencies in the Biogas and biomethane related criteria within the Climate Delegated Act?

The taxonomy defines several eligible activities related to biogas and biomethane. However, certain end uses, which are clearly supported by European policies do not seem to fit into any category, and this generates confusion in the value chain on how to implement the requirement while not providing an adequate driver for investments. For example, an injection site using biomethane from sustainable feedstock from agriculture (including agricultural residues and manure, for example) does not seem to be covered by any eligible activity to date as it does not meet the definition/criteria for Anaerobic Digestion of bio-waste (5.7) nor the production of biogas and biofuels for transport (4.13). In fact, it falls between the two categories.

EBA recommends using this Taxonomy CDA revision cycle to include the screening of one economic activity for Manufacturing of biogas and biomethane for all sustainable feedstocks and independent from end use, guaranteeing consistency on requirements such as:

- Methane leaks monitoring (at the moment, mentioned under 5.7 but not under 4.13)
- The development of appropriate mitigation strategy to limit CH4 and NH3 emissions.

Regarding the amendment to Annex II, point 4.14, EBA recommends broadening the exception to the extension of the lifespan of the networks beyond their pre-retrofit projected to the case network to renewable gases such as biogas, biomethane and renewable hydrogen from biogas reforming.

#### **Environmental Criteria**

EBA supports the inclusion of new economic activities contributing to a more circular economy in particular:

- 2.1 Phosphorus recovery from waste water
- 2.2 Urban Waste Water Treatment
- 2.5 Recovery of bio-waste by anaerobic digestion or composting



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To achieve an actionable set of requirements, EBA recommends modifying the environmental criteria as described in the table annexed and including recovery of nitrogen, to achieve a high level of nutrient recovery and provide sustainable alternatives to polluting synthetic fertilisers, at a time of high price volatility.

#### **About 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.

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