

Brussels, 27 November 2023

Subject: Invitation to Open Dialogue on Biomethane Targets and Sustainable Practices

The European Biogas Association shares your commitment to advancing the goals of food security, sustainable land use, clean transportation and climate change mitigation. Through this open letter, we would like to reiterate our proposal for an open dialogue addressing your concerns associated with a 35 billion cubic meter (bcm) biomethane target.

Sustainability and circularity are prerequisites of the growth of our sector. For this reason, when calculating the potential of the future, we believe it is paramount to carefully factor in possible competition of uses, societal changes, and the utilisation of feedstocks that are currently creating an environmental cost if not treated (biowaste, urban and industrial wastewaters).

We believe that collaboration and open communication are essential to finding solutions that meet the collective goals of our organisations.

While we acknowledge your interest in the EBA reports, we understand that you may still have lingering concerns and questions. However, we regret that no dialogue has been sought, nor questions were addressed to the authors of such reports. To address these concerns more comprehensively, we invite your coalition and all interested civil society groups to engage in open dialogue with experts in the field. We will be more than happy to facilitate this exchange.

We believe in a fossil free future with an energy system based on complementarity of renewable energy solutions. The report you have been recently disseminating ([BIOMETHANE: Setting a target that is fit for food and the climate \(feedbackurope.org\)](https://feedbackurope.org)), recognizes a niche role for biomethane in the future. However, multiple fact-based and scientific studies show significantly higher sustainable potential for biomethane than what your report mentions, as it does not yet consider biogases production from feedstocks such as industrial wastewaters, sequential cropping, biomass from marginal and contaminated lands¹ and synthetic methane production.

The reference to the JRC study² mentioned in your report is misleading, as this report calculates a total sustainable biogases potential of 40 bcm by 2030³, of which 16 bcm is attributed to biogas-CHPs and 24 bcm to upgrading facilities. The report allocates substrates to different technologies as a simplification of practice: whereas biogas from manure is attributed to biogas cogeneration plants in the JRC study, in practice it is also used in plants that feed biomethane into the gas grid.

As part of our invitation to dialogue we would like to propose a visit to one or more biomethane plants to witness firsthand the agronomic practices that facilitate the transition to more sustainable agriculture, the methane emissions abatement in biowaste management or the current techniques to address methane slip (not only environmentally problematic but also impacting the economic operations). Field visits will provide valuable insights into the processes and technologies involved, such as anaerobic plug-flow reactors or silo fermenters specifically designed for dry feedstocks, allowing for a more informed discussion about the agro-ecological, waste management and climate mitigation role of biomethane production.

¹ As put forward in the REPowerEU Biomethane Action Plan

² [Assistance to assessing options improving market conditions for biomethane and gas market rules.](#) (2021)

³ And 101 by 2050

Our intention is not only to address your concerns but also to build a collaborative relationship that fosters ongoing communication and knowledge exchange. Together, we can work towards a common understanding and identify the variety of solutions that align with our shared objectives of promoting sustainability and mitigating climate change.

We look forward to the opportunity to engage in a meaningful dialogue with you and are convinced that our combined efforts can contribute to a more sustainable future.

Sincerely,
On behalf of the European biogas sector



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About the EBA: *Founded in February 2009, the EBA is committed to the active promotion of the deployment of sustainable biogas and biomethane production and use throughout our continent. The association counts today on a well-established network of nearly 300 members representing the whole biogas and biomethane value chain, which includes national associations, scientific organisations and companies working to scaleup renewable energy production and shape the European bioeconomy.*