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RECOMMENDATIONS

Alternative Fuels Infrastructure

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EBA position on the European Commission's proposal revising legislation on Alternative Fuels Infrastructure

The European Biogas Association (EBA) has been an active member of the Commission's Sustainable Transport Forum assisting in implementing and fostering the deployment of alternative fuels infrastructure. We have likewise supported the Alternative Fuels Infrastructure Directive as a technology-neutral piece of legislation helping the EU to reduce its oil dependence. However, over the past few years, the focus has been gradually shifted from all alternative clean fuels to electricity only which we truly regret, given that there are other fuels available in Europe, such as bio-CNG and bio-LNG that can help Europe to achieve zero or even negative levels of CO2 emissions[1]. **The artificial and unilateral support for e-mobility, through the biased tailpipe approach, can jeopardize the EU's objectives to truly decrease the emissions of the transport sector and to get rid of third country dependence.** Any life-cycle analysis of e-mobility can prove that it causes GHG emissions over the manufacturing of engines, well-to-tank (over 40% of the European electricity supply is still fossil) and in the recycling phase. A recent comparison of the JRC also shows that from all combinations of fuel/energy carriers and powertrains explored, biomethane represents one of the absolute lowest greenhouse gas intensive routes[2]. Biomethane and other advanced biofuels are critical to meet the EU's climate challenged and AFIR is needed in the transition from fossil to biofuels.

Biomethane is available right here and now, across Europe, and its production levels can be easily scaled up to ensure ample future supply. It is also among the most affordable advanced biofuels and bio-CNG allows also citizens with low and middle income to have access to low-carbon mobility. We agree that the CNG and LNG infrastructure may be in some countries market-driven but **in order to ensure the required uptake in <u>all</u> Member States to meet the EU's climate objectives, the Regulation should still oblige Member States to fill gaps also in the main CNG networks.**

As bio-LNG will need to play an essential long-term role in maritime and heavy-duty road transport sector, **it is important that the European Commission keeps reviewing the sufficiency of the core LNG network, also after 2025**.

EBA welcomes the provision in **Recital 5**: *The use of fossil gaseous or liquid fuels is only possible if it is clearly embedded into that is in line with the long-term objective of climate neutrality in the Union, requiring increasing blending with or replacement by renewable fuels such as bio-methane, advanced biofuels or renewable and low-carbon synthetic gaseous and liquid fuels.* **Such decarbonization pathways should be included in the legal requirements of the Regulation.** CNG and LNG infrastructure also serves the rapidly increasing share of bio-CNG and bio-LNG sales and Member States that are committed to reach at least 40% bio share in their transport gas mix by 2030 – leading to GHG savings of 55%[3] - should be encouraged to continue developing the corresponding infrastructure in their long-term plans.

However, **these decarbonization pathways should be equally required when electricity, ammonia or hydrogen are deployed**: in many Member States, the electricity supply is still mostly fossil with a very high carbon footprint while the transport gas mix is in several Member States, including the Nordic countries and the Netherlands, close to 100% renewable. Biomethane deployment can reach higher emissions savings than any electricity or hydrogen[4]. For these reasons, also the Article 2 (Definitions) should make a difference between fossil and renewable electricity, hydrogen and ammonia. Fossil energy cannot lead to zero-emission mobility!

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[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] JEC Well-To-Wheels report v5, 2021, JRC, European Comission: https://publications.jrc.ec.europa.eu/repository/handle/JRC121213

[3] https://www.europeanbiogas.eu/wp-content/uploads/2020/06/EBA_NGVA-Europe_TheEuropeanGreenDeal_FastLaneTransport_20200615_spread.pdf

[4] https://publications.jrc.ec.europa.eu/repository/handle/JRC121213

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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.