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EBA response to the Call for Evidence for the Revision of the CO_2 emission standards for cars and vans regulation

The European Biogas Association (EBA) welcomes the Commission's efforts to decarbonise the transport sector and echoes the critical role of the automotive industry in meeting the EU's climate targets. With the automotive industry being responsible for 29% of all CO_2 emissions in 2022[1], and employing over 13.8 million people across the continent in 2025[2], this transformation must be fast and effective, but also just, competitive, and inclusive. To ensure the success of this transition, EBA stresses the need to implement a revision of the CO_2 emission standards for cars and vans regulation that seeks a truly technology-neutral approach. This approach would allow for all climate-neutral solutions to contribute to the decarbonisation of the automotive industry, including the use of sustainable and renewable fuels, such as biomethane.

Current CO_2 standards are focusing exclusively on tailpipe emissions, failing to acknowledge the full decarbonisation potential of the entire lifecycle of emissions coming from renewable fuels of biological origin that are compliant with the sustainability criteria laid out in the Renewable Energy Directive (RED). In fact, these fuels, such as biofuels, are not recognised in the current accounting system of the CO_2 emission standards for cars and vans regulation, despite their proven ability to reduce lifecycle emissions significantly. Therefore, EBA urges the Commission to consider in the upcoming review of the CO_2 standards for cars and vans regulation the pivotal role of biogases and biomethane in being a complementary solution to electrification and a fully sustainable solution in line with the current framework of the RED. Monitoring and verification practices of these fuels could use Union-wide standards and mass balance methods. In this context, the Working Group on Monitoring Methodologies' latest report evaluates eleven approaches for tracking CO_2-neutral fuel use in road transport[3].

That said, EBA calls on the Commission to formally recognise CO_2 neutral fuels as an integral part of the EU's road transport decarbonisation strategy. These are fuels that meet the sustainability and greenhouse gas savings criteria of the RED. Besides the RED, according to Regulation 2018/2066 on monitoring and reporting of greenhouse gas emissions[4], biofuels and biomethane that meet sustainability criteria are considered zero-rated in the EU Emissions Trading System. This means that, when compliant, their use is treated as having a zero-emission factor. Without regulatory recognition, manufacturers, investors and fuel suppliers face a distorted market that focuses solely on the phase out of Internal Combustion Engine (ICE) vehicles without considering the opportunities of bolstering renewable energy sources such as biomethane. In fact, biomethane is a readily available, cost-competitive, dispatchable and compatible alternative to fossil fuels that can be used in ICE vehicles without the need for any retrofitting. Being compatible with existing infrastructure, biomethane can be injected into existing fueling stations for LNG and CNG without requiring further investments for additional infrastructure. When using a Well-to-Wheel methodology, which allows for a complete assessment of the environmental impact of a given fuel, biomethane is proven to be a high performer in terms of emissions reduction in transport. For example, a vehicle running on 40% biomethane mixed with natural gas can reduce its CO_2 emissions by 55%. Depending on the feedstock used, the emissions balance can even be negative when using 100% bio-LNG[5].

[1] European Environment Agency (2025) Transport and Mobility (URL)
[2] European Commission (2025) Automotive Industry (URL)
[3] WGMM (2024) Monitoring the use of CO_2 neutral fuels in road transport, a cross-sectoral industry assessment (URL)
[4] European Commission (2018) Regulation (EU) 2018/2066 of 19 December 2018 (URL)
[5] European Biogas Association (2024) Statistical Report

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It is therefore of key importance to adopt a technology-neutral approach towards all types of renewable fuels that are able to complement electrification and that can help reach the decarbonisation targets at scale. To ensure full recognition and scale up of biomethane, EBA also advocates for the introduction of a Carbon Correction Factor (CCF) in the CO_2 emissions standards. A CCF could remain in place while CO_2-neutral fuel production expands and a dedicated vehicle class is established, as this mechanism would adjust the emissions attributed to a vehicle based on the share of renewable fuels present in the overall energy mix. Overall, a CCF would reflect real emissions, drive investment in renewable fuel production, and incentivise operators and off-takers to use biomethane without undermining the overall climate targets.

Furthermore, EBA asks the Commission to include within the revision of the regulation a dedicated vehicle category for cars and vans powered exclusively by CO_2 neutral fuels. These vehicles, when operating solely on certified CO_2 neutral fuels, should be eligible for a zero-emission status. This designation would ensure that carbon neutral fuels are given the same regulatory and market recognition as battery-electric vehicles, while maintaining consumer choice and technological diversity. Again, the monitoring and verification processes for these fuels must rely on Union-wide methodologies and mass balance approaches already established in RED.

As indicated in the Industrial Automotive Action Plan[6], the Commission must preserve industrial competitiveness, support technology openness, and unlock the production of renewable fuels that will be critical to decarbonise the road transport segment. The lack of recognition for CO_2 neutral fuels in the CO_2 emission standards for cars and vans regulation is a missed opportunity for Europe to become energy independent, energy renewable and competitive. While electrification is essential, this approach alone cannot deliver fast and affordable decarbonisation across all regions, due to lack of infrastructure and vehicle capacity. Complementary options, such as bio-LNG and bio-CNG, are immediately deployable, compatible with existing infrastructure (i.e. CNG and LNG stations), scalable through domestic feedstock supply chains, and offer opportunities for scaling up rural circular economies. Moreover, biomethane is considered CO_2-neutral because its combustion releases biogenic CO_2, which is part of the short natural carbon cycle and does not add new emissions to the atmosphere. The review of the CO_2 emission standards for cars and vans regulation is an opportunity to ensure a transition that is both effective and sustainable. The recognition of fuels and their lifecycle potential based on a Well-to-Wheel approach gives an opportunity to operators to preserve their competitiveness while upscaling the manufacturing capacity of renewable fuels.

[6] European Commission (2025) Industrial Automotive Action Plan (URL)

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About the European Biogas Association (EBA)
EBA fully believes in the future potential of renewable gas in Europe. Founded in 2009, the association is committed to the deployment of sustainable biogas and biomethane production and use throughout the continent. EBA counts today on a well-established network of over 300 national associations and other organisations covering the whole biogas and biomethane value chain across Europe and beyond.