

EBA response to the Call for Evidence

'Carbon removals and carbon farming – methodologies for certifying carbon farming'

The European Biogas Association (EBA) welcomes the opportunity to contribute to the public consultation on the Carbon Removals Certification Framework (CRCF). A core objective of the CRCF is to promote carbon farming practices that either enhance soil carbon sequestration or reduce greenhouse gas (GHG) emissions from soils. EBA stands ready to provide practical recommendations to ensure that carbon farming methodologies fully leverage the climate and circular economy benefits offered by biogas and digestate-based solutions.

1. Eligibility as carbon farming activity

EBA identified three practices linked to the biogas sector that could be eligible as carbon farming activities in agriculture and agroforestry on mineral soils, as outlined in the annex:

1) **CO₂ emission reductions through the use of cover crops, crop rotations and crop residue retention**

Cover crops, crop rotations and crop residue retention are commonly used in biogas production and contribute to soil organic carbon build-up. EBA welcomes the recognition of “improved crop management that increases soil cover and/or the amount of carbon input from crop residues to the soil, such as cover crops, crop rotations, and crop residue retention” as agricultural practices that increase net carbon removals in soils or reduce net CO₂ emissions from soils.

2) **CO₂ emission reductions from the application of digestate or derived products**

Digestate, a co-product of biogas production, is rich in nutrients and organic matter. It can serve both as an organic fertiliser and a soil improver, and when applied to the soil, its organic matter content—including humus precursors—can contribute to soil organic carbon build-up. EBA therefore supports the inclusion of the “use of organic soil improvers or organic fertilisers” among the practices that increase net carbon removals or reduce CO₂ emissions from soils.

EBA would like to clarify one point regarding the term “use of organic soil improvers or organic fertilisers” (see 1.1.1.(a)(v)). We urge that this term encompasses not only products certified under the EU Fertilising Products Regulation (Regulation (EU) 2019/1009) but also **those approved under national legislation**. The FPR currently remains an optional framework, and its incomplete implementation has not yet enabled a fully harmonised market for organic fertilisers and soil improvers. Due to technical and administrative barriers, only one digestate-

derived product has achieved FPR certification in Europe. Requiring FPR certification exclusively would, in practice, prevent many digestate producers from claiming carbon removals under this activity within the CRCF.

3) N₂O mitigation from the application of digestate

Evidence indicates that, when properly managed (particularly regarding storage), digestate application can result in slightly lower N₂O emissions compared with synthetic mineral fertilisers¹, though outcomes are site- and management-specific. EBA supports the inclusion of practices such as “replacement of mineral nitrogen fertilisers by growing leguminous crops, using soil improvers or plant biostimulants,” or a “change in type of fertilising products” among agricultural and agroforestry measures aimed at reducing direct and indirect N₂O emissions from managed soils.

EBA would like to recall that replacing synthetic fertilisers with organic alternatives contributes to reduce CO₂ emissions upstream **by avoiding fossil gas-based fertiliser production**. As of 2024, digestate could already replace over 15% of this synthetic nitrogen (N) fertiliser use, cutting emissions by around 10 Mt CO₂ equivalent per year². While the CRCF Carbon Farming methodology at stake in the current public consultation may not be the most suitable framework for accounting for these upstream emission reductions—since they do not occur “in agriculture and agroforestry on mineral soils”—it is crucial that these benefits are recognised and captured under appropriate legislation.

2. Alignment between CRCF and RED

Under the Renewable Energy Directive (RED), the **Emission Saving from Soil Carbon Accumulation (ESCA) factor** already accounts for part of the GHG emissions savings associated with carbon farming practices. Focusing on increases in soil carbon stocks linked to improved agricultural management, the ESCA factor explicitly mentions practices such as improved crops and crops rotation, the use of cover crops, and the use of organic soil improver – two of the practices also included under the CRCF carbon farming methodologies.

At present, the ESCA methodology remains challenging to operationalise due to its reliance on a **single soil measurement option**. This raises questions about whether soil carbon accumulation can be implemented and verified robustly in practice, given spatial and temporal variability, methodological constraints, baseline determination challenges, associated economic costs, etc. In contrast, the CRCF annex proposes multiple approaches to quantify and monitor the temporary net carbon removal benefit and the net soil emission reduction benefit, including models, direct measurements, and default emission factors.

This gives rise to two important points:

- **Co-existence of allocation systems:** It is unclear how the RED and CRCF frameworks interact in practice. For instance, can a farmer producing RED-certified biogas, who implements cover crops and applies digestate as an organic fertiliser or soil improver, claim emissions

¹ The 2019 refinement to the 2006 IPCC guidelines for national greenhouse gas inventories on N₂O emissions from managed soils, and CO₂ emissions from lime and urea application, indicated that 0.6% of the nitrogen is emitted directly in the form of N₂O, compared to 1% for synthetic fertilisers.

² European Biogas Association. (2025). EBA Statistical Report 2025.

- reductions under the CRCF instead of under RED (thereby not claiming the ESCA bonus)? This raises broader questions about potential inconsistencies, as the RED and CRCF currently use different approaches to quantify emissions reductions.
- **Flexibility in quantification:** EBA welcomes the flexibility offered by the CRCF's multiple quantification approaches. This flexibility could enable certification of certain emissions-saving activities that are currently difficult or impossible to verify under the existing RED methodology.

3. Financial viability as an additionality criterion

The provisions in the annex related to the additionality criteria, particularly regarding financial viability, raise several questions.

From a financial perspective, a biogas producer can benefit from **several potential revenue streams**, including the sale of certified biogas under the RED, the commercialisation of biogas co-products (such as digestate and biogenic CO₂), and/or the generation of carbon credits linked to these co-products or other sustainable agricultural practices under the CRCF. While any of these activities may be financially viable, this does not necessarily apply to the specific activity for which CRCF certification is sought. It remains unclear whether these activities are **assessed individually** for the purposes of financial additionality.

Regarding the requirement that *“the simple cost test shall demonstrate that the implementation of the activity is associated with costs and does not generate any cost savings or revenues other than revenues from certification during the monitoring period”*, certain challenges arise. For example, using digestate as an organic fertiliser or soil improver could generate cost savings, as digestate generally has lower financial value—or no market value—compared with synthetic fertilisers. Furthermore, the use of digestate, as well as the implementation of cover crops, crop rotations and crop residue retention, may enhance soil health, potentially increasing crop yields and generating additional revenues. This raises questions about how such practices can meet the strict financial additionality requirement.

4. Peat-related sustainability requirement

Under paragraph 5.1.(a), the annex states that *“With the exception of peat present in composted biowaste or used as growing media for agroforestry seedlings or for tree nurseries, peat or peat-containing products shall not be used”*. This exception for composted biowaste should also extend to:

- **Digested biowaste:** while peat is generally less likely to be present in biowaste streams treated through anaerobic digestion, due to the typical composition of feedstocks, incidental occurrences cannot be entirely excluded.
- **Digested (and composted) manure:** in certain Member States, such as Finland, peat is widely used as livestock bedding (representing approximately 40% of primary bedding materials), particularly in broiler and cattle production. In these systems, peat becomes structurally incorporated into manure prior to collection and is not introduced as a distinct biomass feedstock at the biogas production stage.

If digestate derived from biowaste or manure containing incidental peat were to be interpreted as a “peat-containing product” under the CRCF methodology, this could inadvertently exclude a substantial share of biowaste and manure-based carbon farming, biogas production and nutrient-recycling pathways from eligibility.

Contact

Lucile Sever, Senior Policy Advisor, sever@europeanbiogas.eu

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.