

## POSITION PAPER

### Revision of the EU Energy Security Framework

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# Recognise biomethane as a security asset in the Energy Security Framework

The ongoing revision of the EU Energy Security Framework comes at a **decisive moment**. Europe continues to face heightened geopolitical instability, persistent energy price volatility, and structural vulnerabilities linked to external energy dependencies. Climate and cyber risks reinforce the need for resilient energy infrastructure.

The revision therefore offers a **critical opportunity** to upgrade this framework to a **new level of maturity**, ensuring that it not only manages crisis response but also actively supports the deployment of **European renewable gases, particularly biomethane, as structural contributors to energy security**.

**Biogases** are not only a decarbonisation solution, they are also an **energy security and resilience asset**:

- By 2050, their **production potential** can replace a major share of the EU demand for natural gas (up to more than 100% in a reduced natural gas scenario)<sup>1</sup>.
- They provide **decentralised supply from thousands of production points** across the continent (20,000+ biogas plants, nearly 1,500 biomethane plants in operation in Europe today).
- They contribute to **flexibility in the energy system**: upstream by delivering dispatchable power generation, and through gas grids and heating systems able to secure energy during power peak demand. They have a steady production profile.
- The **manufacturing base of the industry is European**, mitigating supply chain risks.

Diversification and decentralised production will make the energy system more resilient. Biomethane reinforces the position of existing gas grids as strategic infrastructure for the security of supply, competitiveness and long-term decarbonisation.

**This why EBA urges the European Commission to take the following five recommendations into account:**

- 1. Establish renewable gases as credible long-term diversification opportunity**
- 2. Set an obligation of a minimum renewable gas share in supply portfolios**
- 3. Reflect the potential of biomethane and gas system in risk assessments**
- 4. Safeguard biomethane injection in gas grids from cyber risks**
- 5. Ensure that legislation is fit for a well-functioning internal renewable gas market**

<sup>1</sup> Production of 1,600 TWh in 2050, Guidehouse, *Biogases towards 2040 and beyond* (2024); Total methane demand of 1,094 TWh in 2050 foreseen in TYNDP 2024 Scenario.

## 1. Establish renewable gases as credible long-term diversification opportunity

The current security of supply framework has historically supported diversification of natural gas import routes, but not diversification of gas sources. Regulation 2026/261<sup>2</sup> is focused on the phase-out of Russian gas imports, but it does not ensure that Member States systematically integrate domestic renewable gas potential into long-term energy security planning. Many Member States currently lack systematic mapping of this potential.

In the context of strategic autonomy, Member States urgently need a systematic mapping of domestic biomethane potential, in order to plan credible diversification pathways. Biomethane can be produced from sustainable feedstock, such as agricultural residues, manure, biowaste, industrial wastewaters landfill gas, or wood waste, leveraging both anaerobic digestion and gasification technologies.

**The revised framework should require Member States to integrate renewable gas potential into their long-term diversification approach through the following measures:**

1. Mandate Member States to develop long-term gas diversification policy, with regular updates, not just plans to phase-out Russian gas imports, including measures to support domestic renewable gas production (Article 9, Regulation 2026/261).
2. Require Member States to perform a systematic mapping of biogas and biomethane potential at local (NUTS-3) level, based on sustainable feedstock availability.

This mapping exercise will be a robust strategic basis for Member States to plan ahead the development of biogases and implement their diversification policy.

It will enable national regulatory authorities (NRAs) and grid operators to take the necessary measures to optimise biomethane integration into gas grids, including in the framework of Renewable Acceleration Areas. For better tracking, national diversification policies should be reported regularly under the upcoming revised Governance Regulation.

Local heating and cooling plans (Art. 25(6) of the Energy Efficiency Directive) should pursue resilience along with energy efficiency and renewable energy use. Developing biomethane production and use in a sustainable manner will help deal with emergencies at the local level, acting as a resilience lever. In practice, gas or hybrid heating systems using locally produced biomethane and combined with batteries can ensure that houses remain warm in winters even in case of power shortage. Similarly, biomethane used in back-up cogeneration can ensure that essential services keep running during crises.

## 2. Set an obligation of a minimum renewable gas share in supply portfolios

Long-term diversification is not sufficiently reflected at the level of gas supply portfolios. At present, the EU framework does not ensure that Member States or suppliers include renewable gases systematically.

**The revised framework should create a minimum renewable gas obligation in gas supply portfolios.**

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<sup>2</sup> Regulation (EU) 2026/261 of the European Parliament and of the Council of 26 January 2026 on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938.

- Guarantees of origin and other certificates of origin recognised by national law should be eligible for compliance.
- Flexibility should be built in the compliance design, aligned with the realities of the biomethane market, where gas can be stored and certificates may be used across compliance periods, provided that such flexibility does not undermine predictable offtake and investment conditions for producers.
- The Commission should review the functioning of this obligation every three years and, where appropriate, propose to strengthen it or convert it into binding targets.

This measure will ensure a minimum level of gas supply security through the effective procurement of domestic renewable gas. It would also help suppliers to comply with the supply standard by means of market instruments (Article 6, Gas SoS Regulation).

This measure will be more efficient within an energy policy that recognise renewable gas supply, including biomethane, as a means to meet sectoral decarbonisation targets.

### 3. Reflect the potential of biomethane and gas system in risk assessments

Current risk assessment exercises under the Gas SoS framework may not fully capture the present and future contribution of biomethane to security of supply. They may also overlook the flexibility and resilience that gas-based assets can provide on the demand side. Increasing shares of biomethane supply based on distributed points of production mitigate risks of import route disruption, while existing gas grids are highly resilient to weather hazards. Biomethane can use all existing gas infrastructures, including the underground storage capacities, which are vital to meet the seasonal demand.

This matters because risk assessments shape national and Union-level preparedness decisions. If they do not reflect future renewable gas supply and gas system flexibility, they will underestimate the contribution of biomethane to diversification and resilience.

#### **This is why EBA urges to:**

1. Model demand-side flexibility enabled by gas supply, hybrid heating systems and cogeneration in *national risk assessments* prepared by national competent authorities
2. Require *Grid Operators* to track and make publicly available lists of renewable gas production project with a 5-year horizon and regular updates (Gas Directive).
3. Require ENTSO-G to incorporate the foreseen supply from public project lists into the *EU-wide SoS simulation* (Gas SoS, Article 7) and in the *European supply adequacy outlook* (Gas Regulation, Article 26(4)).

These measures will provide better visibility on the growing role of biomethane in security of supply and its benefits for fuel diversification.

#### 4. Safeguard biomethane injection in gas grids from cyber risks

Transmission and distribution system operators (TSOs and DSOs) are within scope of the CER<sup>3</sup> and NIS 2 Directives<sup>4</sup>. Still, at the level of operators, biomethane infrastructure (injection stations, reverse flows, smart control centres) may not be covered by cybersecurity measures. Biomethane injection goes hand in hand with integration of smart equipment across gas grids, creating cyber risks. Cyber-incidents or attacks on the gas networks or the operating systems of TSOs and DSOs could have cascading effects on the biomethane supply.

Ensuring the continuous injection of biomethane under supply stress or energy crisis is critical to the contribution of a growing biomethane production to the security of supply. As biomethane becomes a more material energy security asset, the infrastructure enabling its integration must be protected accordingly.

**The framework should address cyber resilience for biomethane infrastructure through targeted obligations without creating administrative burden for the producers:**

1. Include cyber risks on biomethane infrastructure into the "*risk assessments*" of *Member States* (Article 7, Gas SoS Regulation) and of *Network Operators* (under Article 12, CER Directive, which define them as critical entities).
2. Oblige Network Operators to provide for business continuity plans for biomethane infrastructure, such as injection points and reverse flow facilities.

This will strengthen biomethane as a domestic security asset, capable of providing supply when other energy infrastructure is under attack.

#### 5. Ensure that legislation is fit for a well-functioning internal renewable gas market

Domestic biomethane production is increasingly relevant for energy security, but the wider EU legislative framework is not consistently fit for a sustained development of sustainable renewable gases. Considering its unique position at crossroads with different sectors (renewable energy, gas market, waste, to cite a few), the biomethane sector is heavily impacted by many pieces of EU law. Fragmented rules and unintended regulatory effects can weaken production incentives and internal market development.

To develop quickly and steadily, the biomethane sector needs a coherent enabling framework, from feedstock procurement to end-uses. The European Commission has a key role to play here. Without regular scrutiny of how EU legislation affects renewable gas production and market functioning, policy inconsistencies may undermine domestic supply growth.

**This why EBA recommends a more systematic fitness approach across relevant EU legislation:**

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<sup>3</sup> DIRECTIVE (EU) 2022/2557 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 on the resilience of critical entities.

<sup>4</sup> DIRECTIVE (EU) 2022/2555 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 on measures for a high common level of cybersecurity across the Union.

1. Establish a Biomethane Regulatory Forum, with strong presence of national ministries and energy regulators, to discuss the need for reforms and the coordinated implementation of EU law.
2. Assess the impact of new relevant legislative proposals on the growth of renewable gas production in the EU.
3. Regularly evaluate the fitness of the EU legal framework for the domestic production of renewable gases and for a well-functioning of the internal renewable gas market.

Such fitness checks will be a safeguard against unintended consequences of existing and new legislative initiatives upon the EU production of renewable gases. It will also support more stable, coherent and effective EU policies.