

EBA response to the Call for Evidence for the revision of the Alternative Fuels Infrastructure Regulation (AFIR)

The European Biogas Association (EBA) welcomes the Commission's revision of the Alternative Fuels Infrastructure Regulation (AFIR). This legislation is an important driver for the scale up of the biogas and biomethane industry, especially for using biofuels as a renewable and sustainable means to decarbonize the hard-to-electrify transport segments.

Background:

1. Biomethane production potential and infrastructure

As stated in the Call for Evidence, decarbonisation of transport remains a high priority for Europe. The AFIR revision must recognise renewable gases, such as biomethane, as being readily available, cost-effective and immediately compatible solutions to bolster alternative fuels consumption. Biomethane's infrastructure, in the form of compressed biomethane (bio-CNG) and liquefied biomethane (bio-LNG) stations, has seen remarkable growth in the past years in Europe. Currently, 16 European countries are producing bio-LNG, with a total of 101 active bio-LNG producing plants in Europe, and an additional 153 bio-LNG stations to become operational by 2028. Taking into account both active plants and forthcoming projects, the combined bio-LNG production capacity by the end of 2027 is expected to reach 22.9 TWh per year, which will be essential to support the decarbonisation of the maritime and road transport sectors across Europe. Moreover, Europe currently counts 147 plants that compress biomethane to produce bio-CNG. Overall, since 2024, Europe amounted to a total of 1935 bio-CNG stations, and a total of 224 bio-LNG stations.

2. GHG emissions reduction

EBA's latest database shows that 80% of Europe's biomethane potential is being consumed to fuel heavy-duty vehicles, while 17% is used to fuel the maritime industry. Biomethane is an excellent performer when it comes to GHG emissions reduction: for heavy-duty vehicles, when using a well-to-wheel (WtW) assessment, depending on the feedstocks used, a vehicle running on 100% biomethane can achieve a negative GHG emissions balance. For vessels, a 100% bio-LNG blend can reduce GHG emissions by up to 93% in the combustion cycle (well-to-tank assessment).

3. Benefits to other EU legislation

The foreseen increase in biogases production in the coming years should be reflected and supported in the AFIR revision, not only to boost the demand for bio-LNG consumption, but also to help achieve the objectives set in EU legislation that impact the biofuels sector:

- **FuelEU Maritime**: the legislation adopts gradual targets to reduce GHG intensity while promoting alternative fuels, such as bio-LNG. The need to scale up biomethane to meet the FuelEU decarbonisation targets should be reflected in the revised AFIR by setting bio-LNG fueling targets and bunkering and storage facilities across key European ports.
- **CO₂ emission standards for cars and vans**: the revised proposal foresees a share of renewable fuels to be used to achieve the CO₂ emission reduction targets from 2035 onwards. Setting technology neutral, renewable gases fuelling targets would further incentivise the uptake of carbon neutral fuels, such as biomethane, and create a demand for biomethane production in the automotive industry.

- CO₂ emission standards for heavy-duty vehicles: building on the above recommendation, the foreseen revision of this legislation should also look at alternative options to decarbonise long-distance and heavy-duty fleets, which do not have the technical and infrastructure capacity to fully electrify.
- Ports and Industrial Maritime Strategies: both strategies mention biomethane as being part of the clean technologies pool that will decarbonise the maritime industry. To do so, ports must be seen as multi-fuel hubs with operational bunkering and storage facilities to supply biomethane directly to vessels.

Recommendations for the revision:

1. **Recitals 5,6,7:** Keep the recognition of biomethane as a renewable fuel that should progressively substitute transport fuels such as liquefied methane of fossil origin. For road transport, the revision should explicitly include targets for freight transport, where bio-CNG represents an immediately deployable renewable alternative for heavy-duty vehicles. For the shipping sector, the current legislation clearly states that hard-to-decarbonise transport sectors, such as maritime and inland waterway transport, need to gradually phase out fossil natural gas with liquefied biomethane (bio-LNG). To do so, the same infrastructure can be used for these fuels. This recognition must be kept in the revised regulation.
2. **Recital 8:** Keep recognising bio-LNG and bio-CNG as fully mature technologies to decarbonise heavy-duty vehicles. However, the current legislation does not foresee specific targets for methane filling stations in Europe. It is fundamental to set maximum distance targets for bio-CNG and bio-LNG stations across Europe to further incentivise the demand for biofuels in this sector.
3. **Recitals 43, 52; Articles 8, 11:** The current legislation states that the TEN-T core network should remain the basis for the deployment of liquefied methane infrastructure (refuelling points to be deployed every 400 km), but acknowledges infrastructure gaps to fulfil these targets in Member States. We recommend setting clear targets for liquefied methane – and thus biomethane – filling stations for road transport (bio-LNG and bio-CNG fueling stations for light-duty and heavy-duty vehicles), and for fueling stations and bunkering facilities for maritime transport, as done for other renewable gases (i.e. hydrogen). This would enable the revision to have a technology neutral approach towards low-carbon and renewable fuels and create a demand for the biomethane market as well.

Promoting biomethane infrastructure across Europe would bolster industrial leadership in biogases, increase the demand for renewable and low-carbon fuels, and build a single market for alternative fuels, all objectives reflected in the Commission's Call for Evidence document. Hence, this revision provides an opportunity to set maximum distance-based targets that remain technology-neutral and sends a positive signal to the biomethane value chain to support transport decarbonisation.

Contact

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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.