

EBA POSITION PAPER

Designing the Post-2030 Energy Framework

1. Introduction

Faced with the current energy crisis – where the EU is passively exposed to external political choices and their disruptive consequences on its economy – **the need to strengthen the EU domestic energy production has become more urgent than ever** to safeguard our autonomy and long-term competitiveness.

The challenge for the next energy framework is to **invest in renewable solutions that are produced within the EU and rely on local value chains**, as they are fundamental to reduce external dependencies and accelerate the energy transition.

Biogas and biomethane stand out as a prominent example in this sense.

2. The versatility and resilience of the biogas sector

Unlike other renewables, **biogas and biomethane represent exceptionally versatile sources**, that can be used across all end-uses, **equally serving the electricity, heating and transport sectors**. They also function as energy storage assets, helping to balance intermittent renewable sources by providing a system flexibility solution. Beyond energy applications, biomethane and its co-product, digestate, can also be used as feedstocks for the chemical industry, further reducing dependence on imported and fossil-based raw materials.

Over the past 15 years, **EU biogas and biomethane production has more than doubled**, increasing from 6.8 bcm in 2011 to 18.6 bcm in 2024, corresponding to **6% of current EU natural gas consumption**. More than half of this production is derived from domestic waste and residue feedstocks, and significant untapped potential remains.¹ Realising it requires the mobilisation of currently underutilised material streams, which are not directed into valorisation pathways due to the complexity of their value chains. Most importantly, **the feedstocks used by the biogas and biomethane sector are sourced entirely within the EU²**, with data for the broader bioenergy sector showing that less than 5% of biomass is imported from outside the Union (equivalent to 1% of total EU energy imports)³ – in stark contrast to the broader EU energy mix, heavily dependent on external supplies.

This positions the sector as a key, yet still overlooked, contributor to Europe's strategic autonomy and competitiveness, supporting the dual objectives of energy security and decarbonisation.

¹ EBA Statistical Report 2025, European Biogas Association, 2025, Brussels

² As they primarily rely on agricultural residues, sequential crops, manure, sewage sludge, landfill gas and municipal bio-waste.

³ See https://www.ieabioenergy.com/wp-content/uploads/2025/01/CountryReport2024_EU27_final_v2.pdf and <https://bioenergyeurope.org/wp-content/uploads/2026/02/Booklet-Single-Page-Website.pdf>

Recent studies also point to a significantly higher biomethane production **potential of 96 bcm by 2040 and 149 bcm by 2050⁴** ⁵.

Beyond fossil fuel substitution, the sector also contributes to the reduction of methane emissions from residual biomass and waste streams⁶, delivering additional climate benefits that reinforce its contribution to EU decarbonisation objectives.

Moreover, the biogas and biomethane sectors represent a **uniquely virtuous model** which generates two bio-based products along renewable energy within the same facility, **delivering a multitude of benefits to several sectors through a single production process.**








Sector	Benefit
 Agriculture	Use of agri residues and return to soil of organic fertilisers
 Wastes	Management solution for organic waste streams
 Fertilisers	Production of organic fertiliser and nutrient recycling
 Energy	Production of renewable energy
 Climate	Direct reduction of emissions compared to fossil sources + carbon removal solution
 Infrastructure	Compatibility with and reuse of existing infrastructure
 End-uses	Effective decarbonisation option for many end-use sectors (especially hard-to-electrify ones)

Figure 1.

From the end-uses point of view, bioenergy already plays a critical role in heating and transport, accounting for around three-quarters of the renewable energy used in those

⁴ In addition, e-methane potentials in the EU are estimated at up to 25 bcm by 2040 and 35 bcm by 2050, increasing total renewable methane potential to 121 bcm and 184 bcm respectively. Read the full study: <https://www.europeanbiogas.eu/wp-content/uploads/2026/04/Biogases.-Europes-overlooked-path-to-energy-independence-1.pdf>

⁵ a) A. Giocoli, C. Carbone, N. Pierro, G. Florio, V. Motola, M. Buffi, A. Agostini, Advanced biomethane potential from local sources in Italy, Journal of Environmental Management, V. 389, 2025, 126154; b) N.A.S. Tjutju, R. Feiz, A. Lindfors, Incorporating uncertainties in assessing biomethane production potential—Application to the case of Sweden, Biomass and Bioenergy, V. 208, 2026, 108777; c) N. Malet, S. Pellerin, T. Nesme, Agricultural biomethane production in France: A spatially-explicit estimate, Renewable and Sustainable Energy Reviews, V. 185, 2023, 113603

⁶ Recent assessments suggest that methane recovery and upgrading from existing landfill sites could provide an additional 1.4–1.8 bcm/year of biomethane production by 2030, even under scenarios consistent with the Landfill Directive objective of reducing municipal waste landfilling to 10% by 2035. https://waga-energy.com/wp-content/uploads/2023/11/2310_WAGA-SUEZ-VEOLIA_Landfill-Study_Report_vsent231011.pdf

sectors⁷. Looking ahead, a recent publication by the JRC⁸ confirms that biogas and biomethane will be increasingly used to decarbonise hard-to-electrify sectors – especially shipping and industry – recognising these energy sources **not as “merely supplementary, but as integral components of the EU’s decarbonisation pathway”**.

In conclusion, recent assessments show that scaling wind, solar and electric vehicles to meet climate targets will require huge amounts of critical raw materials⁹, several of which present high long-term supply risks¹⁰. These resource bottlenecks do not argue against electrification but underline that relying only on mineral-intensive technologies is unlikely to be sufficient or resilient. In this context, biogases play an essential role in a resilient post-2030 energy mix, as they depend primarily on European biomass and existing infrastructure, rather than on imported critical raw materials.

3. Where did the current legal framework fail?

Despite their strategic role, **the EU legal framework has so far failed to adequately support the biogas and biomethane sector**, omitting the necessary measures for its full development.

In particular, the current framework has revealed multiple shortcomings. A non-exhaustive list thereof is provided in the table below.

COST & PRICING	
Issue	Solution
<p>Price gap between biogases and fossil energy sources</p> <p>(which does not account for indirect costs linked to exposure to external dependencies and negative environmental impacts)</p>	<p>Dedicated policy measures should be introduced to bridge this price gap, including:</p> <ul style="list-style-type: none"> • Blending mandates; • Production support schemes (e.g. capital grants, Contracts for Difference, FIT/FiP); • Carbon pricing (ETS, CBAM); • Tax treatment; • Smartly phase out direct subsidies to fossil fuels;
<p>Under-valorisation of the sector’s co-products</p>	<p>On digestate: Recognise its potential to replace synthetic fertilisers and deliver additional benefits for soil health and carbon, while addressing existing</p>

⁷ According to data from the 2025 State of the Energy Union Report, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025DC0667&qid=1762869324977>

⁸ <https://www.sciencedirect.com/science/article/pii/S277242712600080X>

⁹ Such as copper, lithium, cobalt, nickel, silver and rare earths.

¹⁰ [Material bottlenecks in the future development of green technologies - ScienceDirect](#)

(namely digestate and bioCO ₂ , due to regulatory gaps and barriers preventing their marketability)	regulatory barriers ¹¹ ; ensure coherence between the GHG emissions accounting rules for digestate under the RED and the CRCF.
	On bio-CO₂ . Define a comprehensive regulatory framework covering legal status, environmental requirements and accounting rules; introduce EU targets and robust certification and traceability safeguards; support the integration of e-methane production at biomethane plants.
MARKET FUNCTIONING	
Issue	Solution
Overlapping market instruments	Streamline Guarantees of Origin and Proof of Sustainability by merging them into a single trading instrument.
Protectionist approaches at national level combined with unclear national reporting rules	Introduce a dedicated mechanism to avoid double counting , resolve potential disputes between countries, especially for claiming subsidised biomethane, and prevent restrictions on cross-border trade of biogas and biomethane.
Fragmented and divergent national frameworks	A more coherent and harmonised sectoral framework should be established at EU-level to ensure regulatory consistency.
Limitations on the reporting within international frameworks (GHG-P, SBTi)	Ensure recognition of biogas and biomethane certificates within international reporting frameworks.
PROJECT DEVELOPMENT & OPERATIONAL CHALLENGES	
Issue	Solution
Long and complex permitting processes	Provide EU guidance to implement RED III provisions on Renewable Acceleration Areas and ensure their effective application to biogas projects at national level.
Insufficient market demand signals	Provide clear political support through EU-wide targets; promote the use of long-term contracts (BPAs)
Underdeveloped feedstock supply chains	Map feedstock availability, encourage local consumption and improve demand-

¹¹ Link to the FertiCoveury Policy Brief (to be published), which will present recommendations across 11 EU legislations for digestate.

	offer matching, for instance through online marketplaces.
Overall regulatory complexity	Simplify regulatory compliance and make it more practical.

4. What should the next energy framework look like?

In light of the preparation of the next energy framework, and in addition to the points already presented in the [EBA Feedback Paper to the Call for Evidence](#) EBA would like to put forward the following set of recommendations:

Summary of the Paper's Recommendations	
Framework's architecture	<ul style="list-style-type: none"> • Keep a strong focus on renewable energy or shift to an energy security framework rather than a clean energy framework. • Keep the target-based approach and introduce an EU-level obligation to establish renewable gas blending mandates at national level. • Use regulations as the preferred legal tool to ensure rapid and harmonised implementation, complemented by directives allowing national flexibility for secondary aspects.
Sustainability criteria	<ul style="list-style-type: none"> • Harmonise and simplify sustainability criteria across Member States. • Allow greater feedstock flexibility to enable innovation at farm level. • Do not introduce additional or more stringent criteria. • Revise the current Annex IX system and adopt a more dynamic approach to feedstock classification.
GHG accounting	<ul style="list-style-type: none"> • Ensure greater harmonisation in GHG accounting across Member States. • Develop of a coherent overarching GHG accounting framework applicable to all sectors. • Ensure that GHG calculation methodologies recognize broader systemic benefits beyond climate impacts. • Clarify and enforce national RES reporting rules to ensure accurate and harmonized accounting across the EU. • Align EU GHG accounting rules with international methodologies (GHG-P, ISO, SBTi).

	<ul style="list-style-type: none"> • Rebalance the asymmetric treatment of emissions from biomass and fossil fuels with more flexibility for biomass fuels.
Certification and tradability	<ul style="list-style-type: none"> • Establish a harmonised EU wide system for traceability interlinking existing certificates in the short term, and exploring the creation of a singular trading instrument for biomethane in the long run. • Ensure the uniform application of mass balance principles and harmonised evidence requirements across certification schemes
End uses	<ul style="list-style-type: none"> • Introduce sector-specific blending obligations. • Promote market-based instruments such as BPAs and Tripartite Agreements.
BioCO₂	<ul style="list-style-type: none"> • Introduce a biogenic carbon capture target. • Provide a legal basis for the development of a certification scheme by voluntary schemes, as well as a registry ensuring traceability of CO₂ streams. • Remove the time limitation for claiming the ECCR factor in the biogas and biomethane sector.

❖ Framework's architecture

- **Key Principles**

EBA recommends that the next framework be informed by the following principles:

- 1) **Regulatory simplification, coordination and coherence** across all EU legislative sources.
- 2) **Greater harmonisation of Member States' legislation**, to achieve an integrated single market and overcome the current excessive fragmentation.
- 3) **Technological neutrality and level-playing field** among renewable energy sources (particularly renewable gases).
- 4) **Framework stability and continuity with the RED**, in order not to disrupt the business case and jeopardise long term investment decisions.
- 5) **Full recognition and valorisation of the biogas sector's multi-benefits** (as illustrated in Figure 1 of this paper)

- **Focus: Renewable energy**

Regarding the overall architecture of the new framework, EBA calls for maintaining **a strong focus on renewable energy**.

However, in light of the ongoing geopolitical concerns, EBA would not oppose a potential shift from a purely renewable energy-oriented framework to an **energy-security** oriented framework (rather than a vague *clean energy framework*). Such a framework should be designed to safeguard the EU's long-term security of supply, competitiveness and decarbonisation objectives in parallel¹². Should this approach be pursued by the legislators, EBA strongly recommends **maintaining distinct targets for renewable energy and low-carbon energy**, rather than merging them into a single heterogeneous category (given the significant differences between the two).

- **Targets: Blending obligation**

As regards the level of ambition, **EBA calls for maintaining a clear, target-based approach.**

Scientific literature highlights a clear correlation between the introduction of targets and the levels of investment / consumption of specific energy sources¹³. **It is therefore a matter of political choice whether to truly enable the development of a sector or not.** This would also be an effective way to address the longstanding issue of the price gap with fossil sources, which clearly requires policy intervention.

More specifically, given that demand-side measures – in particular blending mandates – proved to be one of the most effective policy tools to achieve targets¹⁴, **EBA calls for an EU-level obligation requiring Member States to introduce a renewable gas blending mandate at national level.**

Flexibility could be left to Member States as regards the exact design of the measure, in particular the sectors to be covered (among transport, heating and industry), the metric to be used (volumes or GHG emission reductions) and the specific penalties. Importantly, the national implementation of such obligation should go beyond the efforts already made under RED III.

To ensure adaptability in cases where sufficient national measures are already in place, EU legislation could also provide for an **opt-out clause**, allowing Member States to waive this obligation if they implement equivalent alternative policy measures.

- **Legal tools: Uniformity by design**

In light of the importance of this sector's legislation, the recurring delays in the national transposition of EU law, as well as the fragmentation generated by the use of directives, **EBA recommends that the next framework be structured primarily as a regulation covering**

¹² More details on the key contribution of biogases to energy security can be found in this paper <https://www.europeanbiogas.eu/wp-content/uploads/2026/04/20260409-EBA-Energy-Security-Position-Paper-FINAL.pdf>

¹³ For instance, analyses show that EU countries with biofuel blending mandates have achieved higher consumption levels compared to countries without such mandates, confirming that market-based regulatory measures effectively stimulate production. [The impact of blending mandates on biofuel consumption, production, emission reductions and fuel prices - ScienceDirect](#)

¹⁴ Ibidem.

all core and structural elements that require harmonised application across the EU. This would improve consistency and legal certainty, as well as enable a single market. **Such a framework could be complemented by directives for elements that may benefit from, or even require, national adaptation,** and which would not affect the overall functioning of the framework and the market even in the event of delays or divergences in transposition across Member States.

In addition, **EBA supports recognising a stronger formal role for regional and local entities** – such as agencies, municipalities and industrial clusters in mapping potential, developing project pipelines and engaging stakeholders. Cross-border and interregional cooperation can further accelerate learning and deployment, and the framework should explicitly recognise and encourage such collaborations.

❖ Sustainability criteria

The **highest priority should be the harmonisation and simplification of sustainability criteria across markets and Member States.** This should be achieved by aligning definitions and requirements at EU level, for instance through a harmonised feedstock classification.

Another key objective is to ensure **greater feedstock flexibility** by recognising all available sustainable feedstocks. This includes, for example, recognizing the eligibility of intermediate crops, crops grown on degraded land, arable grass and permanent grassland¹⁵, without undue legal restrictions (e.g. harvesting cycles or crop-type limitations), which overly complicate their practical application. **The framework should be designed to enable innovation at farm level,** reflecting evolving sustainable agricultural practices. Moreover, it should support collaborative land-use planning and the integration of renewable energy with sustainable agriculture, leveraging synergies between the two.

Importantly, **the revision of the framework should not result in the introduction of additional or more stringent criteria,** as this would widen the gap with fossil-based value chains and discourage the development of local bioenergy, thereby reinforcing our dependence on fossil energy.

Finally, it should also be acknowledged that the **RED Annex IX has failed to achieve its objectives.** It has contributed to a fragmented landscape and created uncertainty due to missing categories, unclear definitions and diverging interpretations. Moreover, the system has been misinterpreted as the exclusive list of sustainable feedstocks, with non-listed feedstocks perceived as unsustainable and thus not accepted by the market despite their high sustainability and circularity performance. In light of the above, **EBA strongly recommends revising the current framework and adopting a more dynamic approach to feedstock classification,** applicable across all end-uses and capable of rewarding sustainability performance based on market realities and industry standards.

¹⁵ Which provide significant environmental benefits, notably the protection of aquatic ecosystems through nitrate removal from vulnerable land.

❖ GHG accounting

Regarding GHG accounting rules, **the new framework should ensure greater harmonisation across Member States**. Current rules under RED Annexes V and VI often lead to divergent results due to the reliance on different data sources by operators and certification schemes. This barrier could be addressed by expanding EU-standardised default values (e.g. for additional feedstocks and production pathways, as well as for Esca values etc.), thereby reducing compliance costs and limiting market fragmentation¹⁶.

More broadly, in the context of the “Post-2030 Energy and Climate Framework”, **EBA recommends that the legislator pursue stronger coordination among EU GHG accounting frameworks**. This is becoming increasingly important given the multiplication of EU frameworks focused on emissions reduction (see rules for products and materials, energy, agriculture, land use and climate¹⁷), which are based on different methodologies and objectives, creating risks of overlaps, inconsistent treatment and double counting. **EBA therefore recommends the development of a coherent overarching framework applicable to all sectors**, enabling the reuse of existing data and the consistent claiming of emissions reduction efforts.

It should be noted that, to compare the performance of products/processes, an approach limited to calculating their direct emissions¹⁸ only provides a partial assessment of the overall impacts and benefits and, most critically, penalises those sectors capable of delivering positive externalities beyond climate. This is the case for biogas and biomethane, which not only deliver significant emission reductions but bring broader system benefits, including security of supply, economic resilience, local value creation and circularity (plus all the benefits illustrated in Figure 1 of this paper). We therefore strongly **recommend that EU GHG accounting frameworks be consistently complemented and integrated with calculation rules capable of reflecting other positive externalities, namely through the recognition of appropriate emissions credits**.

Importantly, **national reporting rules** under the RED, including the compilation of the SHARE tool, **should be effectively enforced to ensure the accurate accounting of renewable energy shares across the EU**. This is essential to maintain consistency, prevent double counting and support the proper functioning of cross-border energy markets.

Additionally, **EU GHG accounting rules should not only align more with, but also shape, international methodologies** (such as the GHG Protocol, ISO standards, and the SBTi framework), in order to improve market clarity and facilitate investment decisions.

Finally, the next framework should address the **regulatory asymmetry in the treatment of renewable and fossil fuel emissions**. At present, while biomass fuels are subject to stringent requirements ensuring full life-cycle emissions accounting, emissions associated

¹⁶ Read 2026 EBA Feedback Paper on Annex VI revision [here](#) for more details.

¹⁷ Some of the frameworks at stake are: RED, CRCF, ETS, LULUCF, ESR, ESPR and PEF methodologies.

¹⁸ Namely, a pure attributional model.

with fossil fuels are not subject to an equivalent level of inspection and are likely underestimated due to the complexity of international value chains. In particular, emissions linked to extraction, refining, transport and processing are often based on assumptions rather than actual measurements. This asymmetry has direct regulatory consequences: by underestimating fossil fuel emissions, the comparative benchmarks (i.e. fossil fuel comparators) used for renewable fuels are artificially lowered, thereby reducing their emissions-saving advantages. **EBA therefore recommends adopting either a more flexible approach to GHG accounting and savings for biomass fuels (allowing for a more gradual increase of thresholds and requirements over time) or a more robust approach to fossil fuel emissions accounting**, in order to rebalance a framework in which increasingly demanding requirements are imposed on biomass fuels, while – paradoxically – fossil-based value chains remain subject to less comprehensive scrutiny.

❖ **Certification and traceability**

A post 2030 framework **should harmonise the EU certification and traceability to** ensure the continued market ramp-up of the sector, overcome barriers to cross border trade, and **deliver a functioning EU single market for biomethane.**

Under the existing Renewable Energy Framework, two separate biomethane certificates have been established, namely the Guarantee of Origin (GO) and the Proof of Sustainability (PoS). These certificates follow two separate traceability models, demonstrate different attributes, and serve distinct markets, creating complexities, inefficiencies and unnecessary administrative hurdles for market participants. These issues are further compounded by a fragmented landscape for trading across borders, alongside the slow rollout of the Union Database and the uncertain status of third country access to the database.

EBA therefore recommends establishing a more harmonised EU wide system for tracing certificates. This requires a pragmatic linking of the Guarantee of Origin (GO) and Proof of Sustainability (PoS), while the benefits of creating a single certificate, through a possible merger of the existing **GO and the PoS, should also be assessed.** A consolidated biomethane certificate would represent a significant development in achieving the simplification and liquidity needed by market participants and ultimately securing the long-term uptake of biomethane.

This should be complemented by **a harmonisation of rules across certification schemes and member states** as means for enforcing the single market principle, facilitating mutual recognition, and simplifying compliance for multi-country operations. This includes the uniform application of **mass-balance principles**, whose interpretations currently differ among Member States and Voluntary Schemes. Moreover, considering the eventual interlinking of GOs and PoS, the application of mass-balance principles as the basis for a harmonised EU wide verification method should also be assessed. Finally, EBA calls for the **harmonisation of the evidence requirements** for certification across support schemes.

❖ End uses

To ensure continuity and regulatory certainty for companies and ongoing projects, the post-2030 energy framework should build as much as possible on the existing framework, while introducing targeted adjustments to enhance flexibility and overall coherence. This is necessary to safeguard investments made under RED III against the risk of becoming stranded. Moreover, existing market pathways should be preserved.

As regards the decarbonization of end-use sectors, while continued efforts to electrify energy demand remain essential, **the legislator cannot overlook the continued structural role of gaseous energy carriers in sectors that are difficult or impossible to fully electrify.** This is particularly the case for the heating, transport and industrial sectors.

- **Heating and cooling sector** – it represents **over 75% of the EU's household energy consumption**, making it one of the largest energy end-use sectors. It remains heavily dependent on fossil fuels, with renewables currently accounting for only 26% of supply (mainly through biomass)¹⁹.
- **Transport sector** – It represent around **30% of the EU total energy demand**²⁰ and is heavily reliant on fossil fuels (e.g. over 90% for road transport), with renewables accounting for only 11,2%²¹ and several segments (namely maritime, aviation and heavy-duty transport) lacking viable electricity-based alternatives.
- **Industry sector** – it accounts for approximately **20% of the EU energy demand**²², with over 50% still supplied by fossil fuels²³ and electricity covering 33 % of the overall industrial demand. Despite legitimate efforts towards electrification, several industrial sectors will continue to depend on high-temperature processes requiring the combustion of fuels. This is the case, for example, for the paper and pulp industry, the chemical sector, iron and steel, non-metallic minerals and the cement sectors, where renewable heat demand is currently met almost exclusively through bioenergy.

Biogas and biomethane currently represent the most reliable, cost-effective and fastest deployable solutions to defossilize non-electrifiable segments while leveraging existing infrastructure. **Industrial actors have strongly emphasised their need for higher volumes of biogas and biomethane** by joining the EBA initiative through the Joint Biomethane Declaration ([link](#)).

Given the technical and operational limitations to full electrification across these sectors, EBA calls for the explicit recognition of biomethane as a key enabler of decarbonisation, demand flexibility, and security of supply. Particular attention should be

¹⁹ [Heating and cooling from renewables gradually increasing - News articles - Eurostat](#)

²⁰ https://www.eea.europa.eu/en/analysis/publications/sustainability-of-europes-mobility-systems-2025/energy?utm_

²¹ [Renewable energy statistics - Statistics Explained - Eurostat](#)

²² https://ec.europa.eu/eurostat/web/interactive-publications/energy-2025?utm_

²³ https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240513-1?utm_

given to mature renewable gas pathways capable of delivering immediate volumes through existing infrastructure.

In particular, EBA recommends introducing sector-specific renewable gas blending obligations (as outlined above), to create the necessary market pull to accelerate decarbonisation. Importantly, the national implementation of such obligation should go beyond the efforts already made under RED III.

In addition, **the new framework should further support market-based instruments**. This includes promoting **Biomethane Purchase Agreements (BPAs) and Tripartite Agreements**, which can provide long-term price stability for both producers and consumers by facilitating predictable pricing arrangements and risk-sharing mechanisms. Such agreements can enhance investment certainty, support the development of a well-functioning single market for renewable gases, and strengthen the business case for biogas and other renewable gases across the EU.

❖ **Biogenic CO₂**

Given the deep interlinkage between the post-2030 energy framework and the EU's 2040–2050 climate targets, the acceleration of renewable energy's uptake cannot be separated from consideration of how to achieve climate neutrality. For this reason, **EBA recommends that the next energy framework includes dedicated provisions on carbon capture**, given its strong link with certain renewable energy sources such as bioenergy.

At present, the EU lacks a legally binding framework setting clear levels of ambition for carbon capture and removals²⁴. **EBA therefore recommends that the next energy framework introduce carbon capture targets, and in particular a dedicated target for biogenic carbon capture**. This is particularly important given that bioCCUS represents one of the most cost-effective and readily available solutions for carbon capture, which requires explicit political recognition to harness its potential.

Furthermore, to support the development of a functioning CO₂ market, **EU legislation should explicitly provide a legal basis for the development of a certification scheme by voluntary schemes, as well as a registry ensuring traceability of bioCO₂ streams** in the case of shared infrastructure. Finally, the next framework should **remove legal barriers such as the time-limit to claim the ECCR emission-saving factor in biogas and biomethane production beyond 2035**, which risks undermining the business case for CO₂ capture and slowing down this market development.

Conclusions

EBA appreciates the opportunity to provide its feedback on the preparation of the post-2030 Renewable Energy Framework and remains fully committed to continuing the

²⁴ Apart from the CRCF regulation, which is an enabling framework.

discussion with the European Commission on how to improve the legal framework to foster and support the development of the biogas and biomethane sector.

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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.