

Stakeholder Contributions to TRIS - European Commission

EBA response to the Decree on the environmental performance requirements applicable to the installation of heating or domestic hot water production equipment in the construction of buildings or parts of buildings (2026/0278/FR)

The European Biogas Association ([EBA](#)) agrees with the European Performance of Buildings Directive (EPBD)'s objective to accelerate the decarbonisation of buildings and reduce greenhouse gas emissions from the heating and buildings industry. However, EBA stresses that the success of this initiative depends on integrating electrification with other renewable energy solutions. More specifically, this objective should be achieved through a **technology-neutral approach** that recognises the contribution of different renewable and low-carbon solutions. In particular, the **potential of renewable gases, including biomethane, should not be overlooked**.

In 2024, total EU electricity consumption amounted to 2,701 TWh, with 20% of it generated from natural gas. Meeting the climate neutrality goals will require not only more clean electricity but also renewable gases and heating solutions able to use these resources when and where they are the more relevant. The total production of electricity from biogas and biomethane in 2024 amounted to over 71 TWh. This means that biogases accounted for over 6% of the renewable electricity produced in the EU-27¹. While biogases remain important, biomethane is Europe's fastest-growing segment. Production reached 5.2 bcm in 2024, with an annual capacity rising from 5.5 bcm in 2022 to 7 bcm by early 2025. In 2024, 18 % of the biomethane produced in Europe was used in buildings, contributing to the sector's decarbonation².

In the French framework, EBA is concerned that the notified draft decree 2026/0278/FR exceeds the provisions provided by the EPBD. In the draft decree, France explicitly mentions its intention to end the use of gas in new buildings, by introducing a ban on installation of boilers other than those running on electricity solely, starting from 1 January 2027: *"introduce, for new buildings, a ban on the installation of boilers with greenhouse gas emissions above 79 g/kWh, which corresponds to the regulatory threshold for electricity emissions"*³. **EBA highlights the lack of consideration of renewable gases as part of the heating energy system, in clear contradiction with the EPBD framework.**

Biogas and biomethane are proven, dispatchable and scalable renewable resources that enhance renewable electrification and enable efficient energy system integration. Moreover, biomethane can decarbonise existing gas infrastructure while providing a locally produced and storable energy source, supporting security of supply and resilience during periods of high and seasonal heating demand. The role of biomethane in strengthening energy security also underlines the importance of recognising existing gas-compatible heating technologies, such as gas-fuelled boilers, which can operate with compatible renewable gases.

Biogases can be used in a variety of sectors, especially in hard to electrify sectors and buildings which cannot fully rely on electrification. By promoting the production of renewable gases, such as biomethane, Europe strengthens the efficiency, resilience and affordability of the whole energy transition and fulfills a complementary role to electrification.

¹ EBA (2025) Statistical Report

² EBA (2025) Statistical Report

³ Notification 2026/278/FR

Hybrid heating systems, such as hybrid heat pumps, can further contribute to this transition by combining renewable electricity with renewable gases, responding to external factors, such as long cold snaps, *Dunkelflaute*⁴ episodes and related energy peak demand. Therefore, hybrid systems can complement electrification while ensuring electric demand flexibility, affordability and security of supply. The French approach to an electrification-only decarbonisation objective of the heating system would however explicitly exclude hybrid systems, without considering the decarbonisation capacity of renewable gases, as the ban would apply from 1 January 2027 for private residential buildings onwards. This raises questions vis-a-vis the proportionality of the measure considered, its technological neutrality and its compatibility with the EPBD framework, which recognises the role of renewable and low-carbon energy and explicitly accommodates hybrid heat pumps.

EBA therefore encourages the Commission to assess whether the **79 gCO₂e/kWh** threshold proposed in the French framework, and the resulting phased exclusion of gas-based and hybrid heating systems from 2027, is necessary and proportionate to the objective pursued and consistent with the EPBD. The national framework should provide a credible means of recognising the contribution of renewable gases, including biomethane, rather than excluding compatible technologies by design. Preserving technological diversity would support consumer choice, investment certainty, competition and cost-effective, resilient and locally sourced decarbonisation pathways.

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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.

⁴ Dunkelflaute is a period of little wind and sunlight, resulting in very low electricity generation from wind and solar power