

REGULATORY BARRIERS TO BIOGAS DEVELOPMENT IN EUROPE

Key regulatory and administrative bottlenecks affecting the biogas and biomethane sector, and targeted policy recommendations to address them.

SUCCESS STORIES



FEEDSTOCK

National support scheme to increase use of livestock manure in biogas production, with target of processing 30% of manure through biogas by 2035, and direct payments to farmers supplying the manure.



PERMITTING

Digital-first approach to environmental permitting with a single environmental permit applied for through a centralised digital system (KOTKAS).



BIOGAS PLANT

Biomethane and biogas production target of 5.5 bcm by 2030 in its National Energy and Climate Plan, which is in line with the country's technical potential.



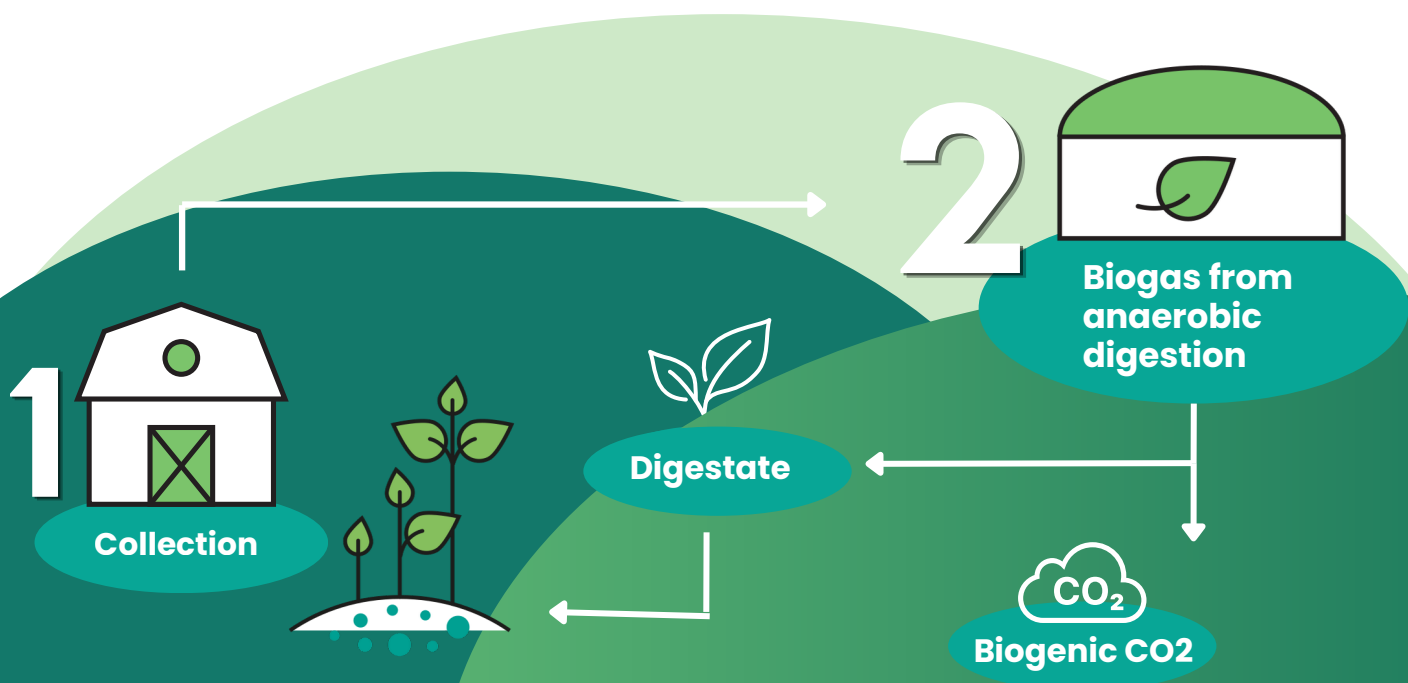
DIGESTATE

Support scheme aimed at developing a market for recycled fertilisers, which supports the processing of manure and other biomass in biogas plants by providing a payment based on the recycled phosphorus multiplied by a fixed recycling price per tonne.



BIOGENIC CO₂

Investment grants of €90 million for capture of bioCO₂ on the basis of a competitive tender. The support will be allocated to projects with a bio-based carbon capture capacity of at least 15,000 tonnes per year.





GRID INJECTION

Producer covers 25% of grid connection costs and grid operator the remaining 75% for plants within 10 km of the grid, plus reverse compression costs and legally guaranteed injection availability of 96% of the time.



HOUSEHOLDS

Social housing projects have coupled solar thermal systems with biomethane-fuelled gas boilers to provide citizens with affordable and reliable heating without over capacitating the electricity network.



INDUSTRY

Despite lack of clear guidance on acceptance of biomethane certificates within the GHG Protocol, certain companies, have performed the task of accounting for their biomethane certificate purchases.



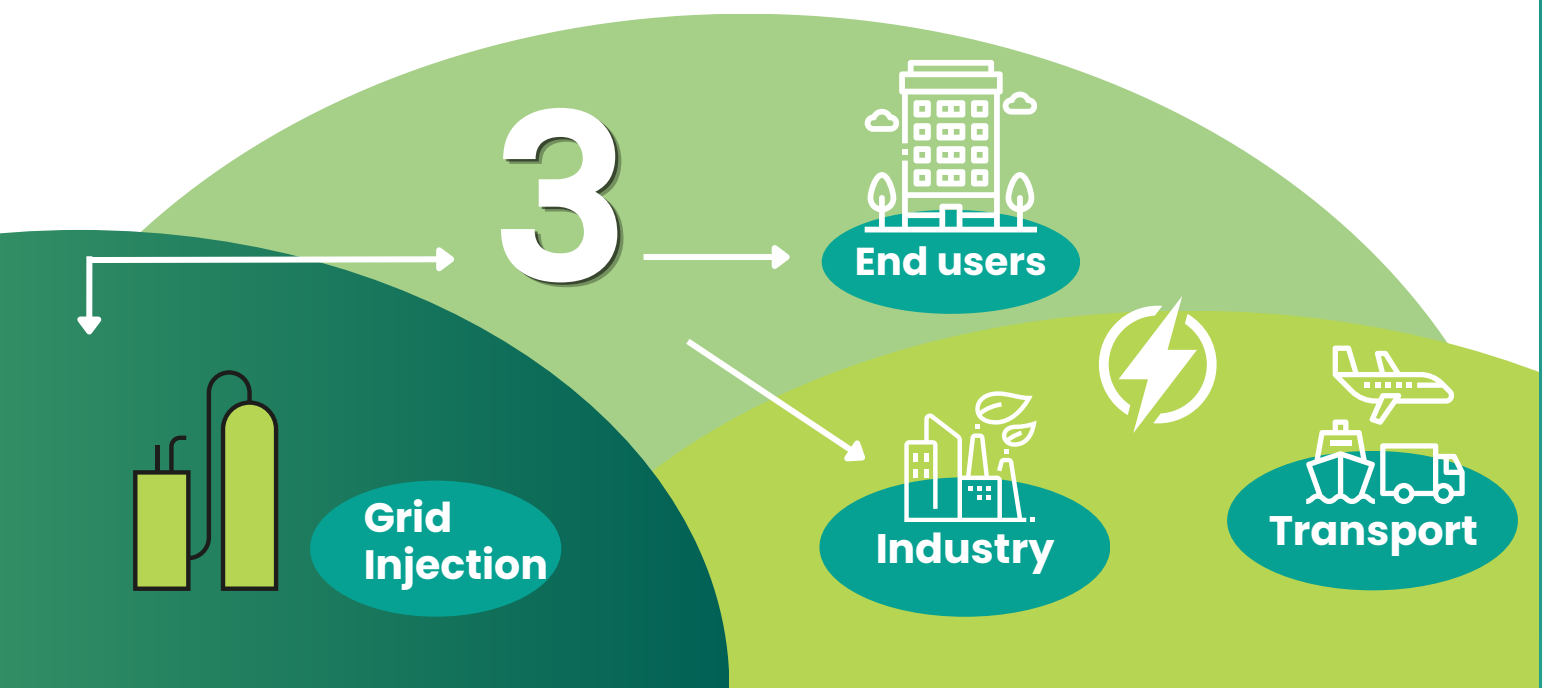
BPAs

ENGIE provides long-term off-take agreements for biomethane (BPAs), usually 10 years, ensuring stable supply by buying a specific amount of renewable gas alongside a guarantee of origin (GO) and proof of sustainability (PoS).



TRANSPORT

National transport fuel policy is placing greater emphasis on advanced biofuels and biogas, with their share set to rise from 2% of transport fuel consumption in 2026 to 10% by 2030. Meanwhile, the contribution of first-generation biofuels will continue to be limited to 3.1%, supporting a shift toward waste-derived and more sustainable fuels, including biomethane.



DIMENSION 1: PERMITTING AND PLANNING

Can biogas and biomethane projects get built, on time?

Biogas projects cross six regulatory sectors, triggering overlapping permits and long lead times.

BARRIER 1 : Slow and fragmented permitting delays sector development

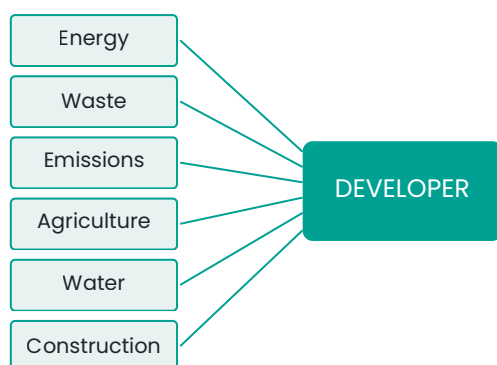
RECOMMENDATIONS

- ✓ **One-stop-shop** covering all **permits** a project needs
- ✓ Fully **digitalise permitting procedures**, in line with RED III
- ✓ Simplify and **fast-track permitting** for **existing biogas plants** upgrading to biomethane production or changing feedstocks
- ✓ Strengthen **cross-sectoral coordination** and **train permitting authorities**



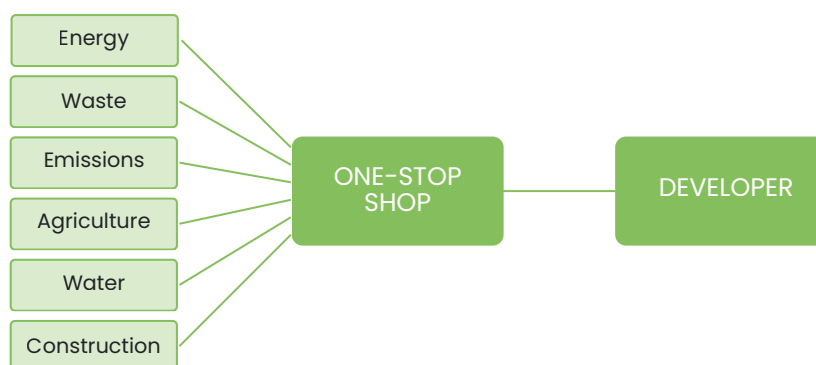
Today

Multiple approvals, one developer



One-stop-shop

One coordinated entry point



DIMENSION 2: INVESTMENT AND MARKET CERTAINTY

Is biomethane worth investing in?

Biomethane can cut the EU's import dependency and support the circular economy by making use of locally available organic resources, but without binding, long-term policy signals, investors hesitate and the sector cannot scale.

BARRIER 1: Biomethane's strategic value is not reflected in Europe's regulatory frameworks



RECOMMENDATIONS

- ✓ A renewable gas **blending obligation** at EU-level
- ✓ Dedicated **national biomethane strategies**
- ✓ Formal recognition of biomethane in **EU energy security frameworks**

BARRIER 2: Insufficient incentives for recycling organic waste through anaerobic digestion in EU legislation



RECOMMENDATIONS

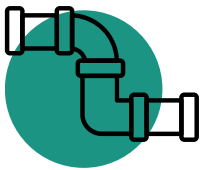
- ✓ Develop regional circular economy strategies
- ✓ Enforce **mandatory biowaste collection**
- ✓ Redirect **manure, sewage sludge and industrial residues** to anaerobic digestion
- ✓ Expand **nutrient recycling** under the **Urban Wastewater Treatment Directive**
- ✓ Recognise broader organic waste recovery under the **EU Taxonomy**

DIMENSION 3: MARKET INTEGRATION

Can the gas that is produced reach the market?

Connection and certification rules differ by country, posing the greatest challenge for small, decentralised producers.

BARRIER 1: Lack of a harmonised framework for grid access is blocking market entry for biomethane producers



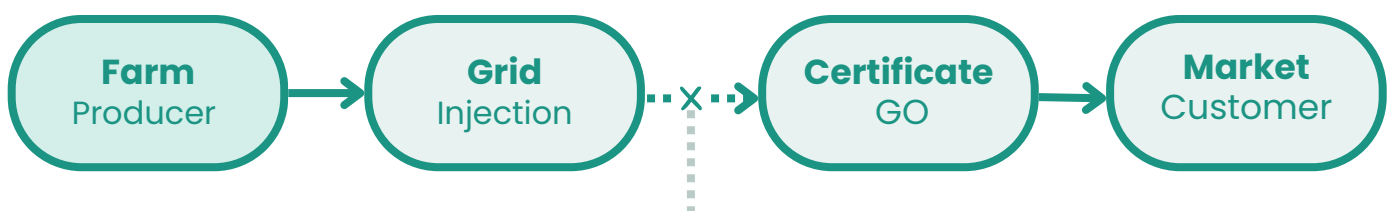
RECOMMENDATIONS

- ✓ Fast and consistent **implementation of the EU Gas Package**
- ✓ **Harmonised connection rights** and fair cost-sharing mechanisms
- ✓ Recognise **virtual pipelines** and **mobile injection** technologies

BARRIER 2: Fragmented national systems are undermining the Internal Market for renewable gases

RECOMMENDATIONS

- ✓ Accelerate national **Guarantee of Origin registries** compatible with the EU framework
- ✓ **A single EU hub** for cross-border Guarantee of Origin transfers
- ✓ A fully operational **Union Database** for traceability



Rules differ by country

DIMENSION 4: CLIMATE RECOGNITION AND CARBON ACCOUNTING

Is biomethane's climate value recognised?

Avoided methane, biogenic CO₂ capture, digestate replacing fertiliser: these benefits are not consistently counted across EU frameworks.

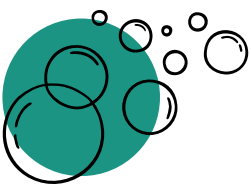
BARRIER 1: Uneven GHG accounting

RECOMMENDATIONS

- ✓ Harmonise GHG accounting across EU frameworks
- ✓ Recognise **biomethane certificates** in corporate accounting
- ✓ Ensure **corporate reporting frameworks** (GHG protocol, SBTi) are aligned
- ✓ Harmonise documentation requirements for the **ETS zero-rated emission factor**
- ✓ Ensure correct representation of biogas and biomethane activities in EU taxonomy



BARRIER 2: Lack of legal and infrastructure support for a biogenic CO₂ market



RECOMMENDATIONS

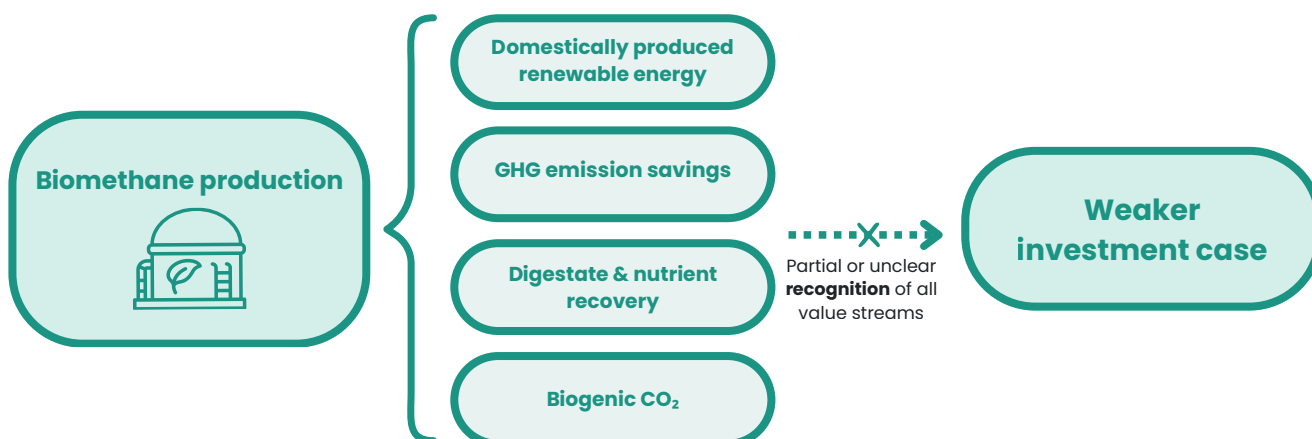
- ✓ Establish a common **carbon accounting methodology** for biogenic CO₂
- ✓ Common **sustainability and quality requirements** for biogenic CO₂, as well as a **traceability system**
- ✓ Ensure CO₂ infrastructure accommodates **decentralised, biomethane-derived sources**
- ✓ Remove the time limit for '**ECCR**' emission saving factor

BARRIER 3: Under-incentivised local nutrient circularity to substitute synthetic fertilisers

RECOMMENDATIONS

- ✓ Establish **clear national and EU-level standards** to recognise digestate as an **organic fertiliser**
- ✓ **Reform the Nitrates Directive** to allow digestate to substitute synthetic fertilisers
- ✓ Recognise **digestate application as a carbon farming** activity

Incomplete recognition of biomethane's climate and environmental value



DIMENSION 5 : DEMAND FOR BIOGASES AND CO-PRODUCTS

Is the current framework supporting the demand for biogases and its co-products?

Biogas and biomethane can help decarbonise **transport, heating and industry**, but current EU frameworks do not provide enough recognition to unlock demand.

BARRIER 1: Biomethane overlooked in EU road transport regulation

RECOMMENDATIONS

- ✓ Binding renewable transport **targets** for **bio-CNG and bio-LNG**
- ✓ EU-wide **definition of CO₂-neutral fuels** recognising biomethane
- ✓ Well-to-wheel emissions accounting for road transport
- ✓ Dedicated category for **vehicles running on CO₂-neutral fuels**

BARRIER 2: Risk of marginalising biogas and biomethane in heating decarbonisation

RECOMMENDATIONS

- ✓ Recognise biogas as a **flexible, complimentary** and **secure** energy source for buildings
- ✓ Include biogas and biomethane in **building renovation strategies**
- ✓ Promote **hybrid heating systems** combining renewable electricity with renewable gas appliances
- ✓ Incentivise biomethane through blending obligations and green gas contracts



BARRIER 3: Lack of frameworks enabling industrial demand and corporate long-term off-take agreements for biogases

RECOMMENDATIONS

- ✓ Remove barriers between supply and demand for biogases and promote **Biomethane Purchase Agreements**
- ✓ Recognise biomethane **GOs** in corporate carbon accounting

BARRIER 5: Lack of incentives for the uptake of advanced bio-based fertilising products



RECOMMENDATIONS

- ✓ Support **investment in digestate upgrading** and **biorefineries**
- ✓ Introduce a **mandatory bio-based content requirement** for fertilisers
- ✓ Provide **CAP incentives** for farmers adopting advanced bio-based fertilisers
- ✓ Link **ETS free allowances to the scale-up** of bio-based fertilising products

About the European Biogas Association (EBA)

EBA fully believes in the future potential of renewable gas in Europe. Founded in February 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 nearly 300 national associations and other organisations covering the whole biogas and biomethane value chain across Europe and beyond.

www.europeanbiogas.eu