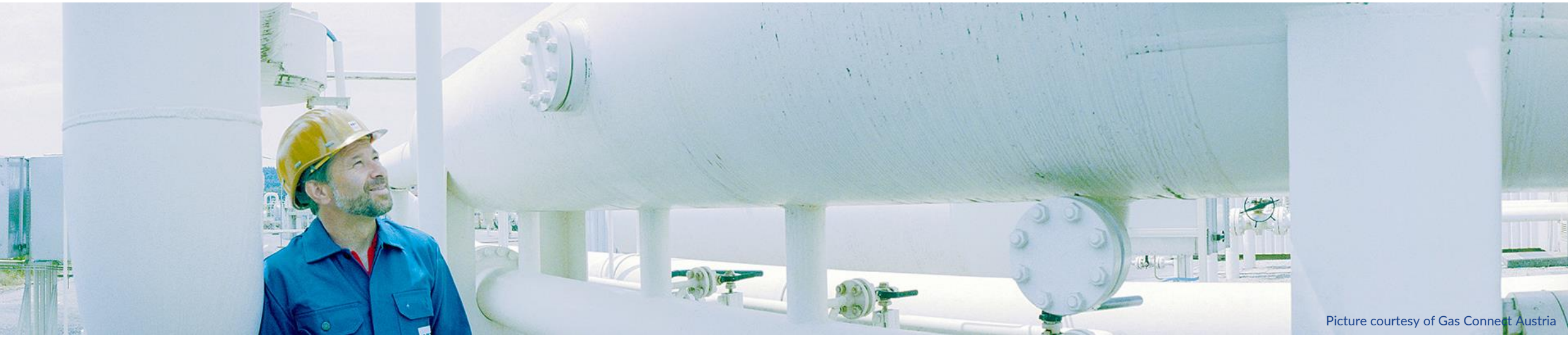


Biometan w regulacjach UE

„Biometan w Krajowym Systemie Przesyłowym”, 28 listopad 2023

Karolina Golonka, Legal & Market Adviser, ENTSOG

Biomethane in EU Regulations

No definition of **biomethane in the EU law**

In general, EU policies regulating gases does not classify them by their process pathways.

To clasify a gas as a biogas/biomethane following criteria has to be checked:

a) **Feedstock** it was produced from

b) a set of **sustainability criteria**/production requirements

c) a **GHG emissions savings threshold**

RED III

Energy from biogas/biomethane **shall be counted** towards Member States' shares of renewable energy and the targets referred to in Articles:

3(1) (gross final consumption),

15a(1) (building sector),

22a(1) (industry sector),

23(1) (heating and cooling),

24(4) (district heating and cooling) and

25(1) (transport)

Rozszerzenie sektorów objętych celami ograniczania emisji

Definitions

Biogas definition under RED II means gaseous fuels produced from **biomass**.

'Renewable gas' means biogas as defined in Article 2, point (28) of Directive (EU) 2018/2001, including **biomethane**, and renewable gaseous fuels part of fuels of non-biological origins ('RFNBOs') as defined in Article 2, point (36) of that Directive

The **additional requirements** proposed require economic operators to prove a certain threshold of GHG emissions savings.

Current proposals from Gas & Hydrogen Package

Current biomethane map of Europe can be found under the following link:
https://www.gie.eu/publications/maps/european-biomethane-map/

Biometan – rodzaj biogazu. Wprost wskazany jako zaliczany do gazów odnawialnych.

Sustainability and GHG savings criteria – art 29-30 RED II/III

Sustainability criteria: refer to the biomass origin and harvesting

GHG savings criteria

Art. 29 and 30 RED II include a 50% - 80% GHG reduction threshold for biogas depending on the sector and facility installation year:

- *50% - 65% GHG reduction for biogas consumed in the transport sector*
- *94 gCO_2e/MJ / 70% - 80% GHG reduction for biogas consumed in other electricity, heating and cooling sectors*

Annex VI.19 RED II specifies four fossil fuel comparators for GHG reductions for renewable gases depending of the final use:

- 183 grams CO2eq/MJ for electricity
- 80 grams CO2eq/MJ for heat
- 124 grams CO2eq/MJ for heat substituting coal
- 94 grams CO2eq/MJ for transport

Annex VI ma być poddany kolejnym konsultacjom przez KE,
ponieważ progi bazowane są na IPCC Guidelines z 2006 i

Guarantees of Origin for biomethane

- **Article 19 RED II:** *"an electronic document which has the sole function of providing evidence to a final customer that a given share or quantity of energy was produced from renewable sources."*
- GOs exclusively used for information to final consumers of biogas or hydrogen on the source of supply + issued producers' request and traded on the market as additional revenue stream to supplement financial support for production of renewable energy.
- GOs cannot be used by Member States as proof for meeting their renewable targets. **They cannot be used for demonstrating that sustainability or GHG savings criteria are met either.**
- GOs do not contain sufficient information to certify sustainability. The draft EN 16325 standard, which allows inclusion of RED II sustainability and greenhouse gas emissions information on biomethane under article 29 RED II as optional data-fields.
- As GOs can be traded independently from the physical volumes of biomethane, the EU Commission believes that they do not ensure by themselves that double counting is prevented. Which is why RED II Article 19 (2) explicitly requires MS to ensure that double counting is avoided.

Gwarancje pochodzenia nie mogą być użyte do udowodnienia celów EU ETS

RED III – Guarantees of Origin (art 19)

- **GO shall be valid for transactions for 12 months after the production of the relevant energy unit.** Member States shall ensure that all guarantees of origin that have not been cancelled expire at the latest 18 months after the production of the energy unit. Member States shall include expired guarantees of origin in the calculation of their residual energy mix.';
- For the purposes of disclosure, Member States shall ensure that **energy companies** cancel **GOs at the latest six months after the end of its validity**.
- Member States shall ensure that the data on their residual mix is published on an annual basis;
- When a customer consumes gases from a hydrogen or natural gas network, including gaseous renewable fuels of non-biological origin or biomethane, as demonstrated in the commercial offer by the supplier, Member States shall ensure that the guarantees of origin that are cancelled correspond to the **relevant network characteristics**.

Ważnosć GOs -12 miesiecy. GOs może być oddzielony od fizycznego substratu.

RED III – Guarantees of Origin (art 19)

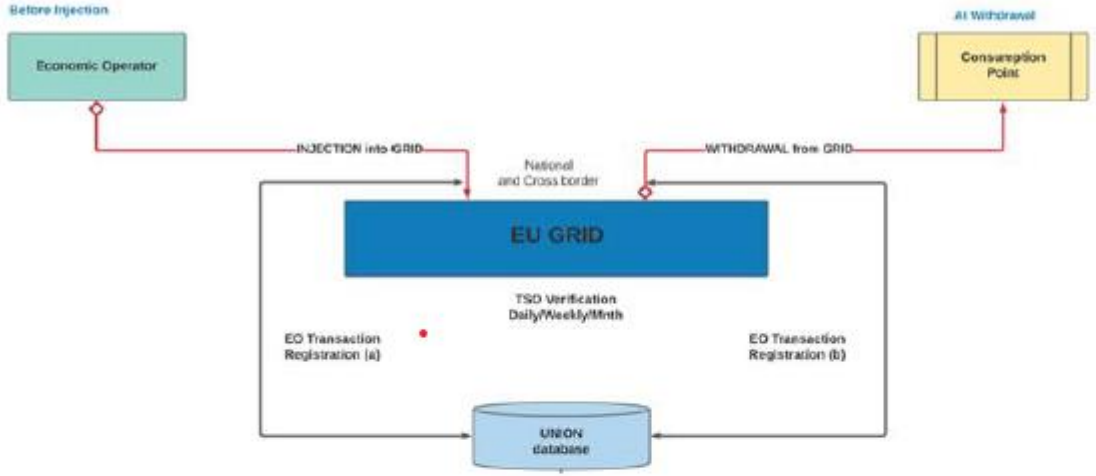
Member States shall ensure that a guarantee of origin is issued in response to a request from a producer of energy from renewable sources ***including gaseous renewable fuels of non-biological origin such as hydrogen, unless Member States decide, for the purposes of accounting for the market value of the guarantee of origin, not to issue such a guarantee of origin to a producer that receives financial support from a support scheme***. Member States may arrange for guarantees of origin to be issued for energy from non-renewable sources. Issuance of guarantees of origin may be made subject to a minimum capacity limit. A guarantee of origin shall be of the standard size of 1 MWh. ***Where appropriate, such standard size may be divided to a fraction size, provided that the fraction is a multiple of 1 Wh.*** No more than one guarantee of origin shall be issued in respect of each unit of energy produced.';

Państwo członkowskie może zdecydować o nie wydawaniu GOs producentom, którzy korzystali z systemów wsparcia finansowego.

Union Database

Draft RED III **art.31** on the Union database for tracing renewable liquid & gaseous transport fuels:

- For gaseous fuels, economic operators should only enter info on the transactions + sust. characteristics and GHG emissions up to the injection point, where the mass balancing traceability system is complemented by GOs
- GOs are cancelled after the consignment is withdrawn from the EU interconnected gas grid [but are not tradable outside the UDB]
- UDB for all end-uses of gas foreseen in a year's time after adoption of RED III (# 3 months proposed by the EC)



Obecnie Komisja pracuje nad uruchomieniem UDB

Sustainability and GHG savings criteria

For compliance with these criteria, RED II provides two options:
1. A national mass balancing scheme
2. Certification by voluntary certification schemes recognized by the EU Commission

Certification of compliance with sustainability criteria has to be based on the principle of mass balancing, which implies a certain degree of physical tracking.

GOs can be transferred separately or together with the physical transfer of energy –book & claim principle.

RED II art. 19 and RED II art. 25-30 on sustainable certification of biomethane thus outline a different set of requirements, with different purpose and scope, but both are binding.

For biomethane, for which both schemes apply, double counting should be avoided, and the same consignment should not be claimed for both GOs for end consumer disclosure and sustainability certificates.

Konieczne mechanizmy zapewniające, że nie będzie występowało double counting

EU Policies

REPower EU

- EU's biomethane production needs to reach **35 billion cubic metres (bcm) per year by 2030**
- **Not included in any binding EU level legal act so far.**

The Biomethane Industrial Partnership (BIP) was launched on 28 September 2022. Its objective is to support the achievement of the EU's 2030 target of 35 bcm annual production and use of sustainable biomethane and to create the conditions for a further ramp-up of its potential by 2050. It will promote active engagement between the Commission, EU countries, industry representatives, feedstock producers, academics and NGOs. The Commission will work closely with EU countries to support them in their development of national strategies on biomethane production and to promote cooperation on biomethane with neighbouring countries, including Ukraine.

To task ENTSOG with monitoring of the injection of renewable and LC gases - Current proposals from Gas & Hydrogen Package

Thank you for your attention

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