

# **Public consultation on accounting methods and conditions for the 10% renewable energy in transport target – and on the need for additional types of biofuels being listed in Annex III of the Renewable Energy Directive**

## ***Introduction***

The European Union (EU) has set in the Renewable Energy Directive<sup>1</sup> ('the Directive') an overall 20% renewable energy target in final energy consumption and a 10% target of renewable energy in transport for 2020. For the transport sector each Member State has to ensure that the share of energy from renewable sources in all forms of transport in 2020 is at least 10% of the final consumption of energy in transport in that Member State. All forms of energy from renewable sources can contribute to the target, including biofuels - liquid or gaseous - and electricity produced from renewable sources. The Directive required Member States to submit by June 2010 National Renewable Energy Action Plans<sup>2</sup> setting out inter alia the contribution expected of each renewable energy technology to meet the 2020 targets, including in the transport sector. The Renewable Energy Directive contains rules for the calculation of the 10% targets<sup>3</sup>.

For biofuels, this involves using the energy contents that are listed in Annex III to the Directive.

This Annex can be updated. This public consultation, in section D, seeks views on whether and how the Annex should be updated.

For the contribution of electricity from renewable sources, the Directive prescribes that the average share of electricity produced from renewable energy sources (Member States or EU level) has to be taken into account in the calculation. In addition, the Directive requires the Commission to present by December 2011, if appropriate, 'a proposal permitting, subject to certain conditions, the whole amount of the electricity used to power electric vehicles to be counted towards the 10% target'. This public consultation, in section A, seeks views on what conditions could reasonably be applied for this.

As far as hydrogen originating from renewable sources is concerned, the Directive does not include any specific rules on how to account this towards the 10% target. Further, hydrogen is currently not part of the EU energy statistics system. This means that Eurostat and the Member States would develop statistical methodologies along the lines of the overall energy balance when the contribution of hydrogen to the fuel mix will become significant. The Directive requires the Commission to present by December 2011, if appropriate, 'a proposal for a methodology for calculating the contribution of hydrogen originating from renewable sources for counting towards the 10% target'. This public consultation, in section B, seeks views on what method(s) could reasonably be applied for this.

For the contribution of methane originating from renewable sources (biomethane<sup>4</sup>) and supplied via the natural gas grid, the Directive does not include any specific rules for the calculation towards the 10% target. In the absence of accurate statistical methods for measuring the share of injected biomethane consumption by sector, Eurostat would attribute

<sup>1</sup> Directive 2009/28/EC OJ L140 of 5.06.2009 p. 16

<sup>2</sup> All plans are available at: [http://ec.europa.eu/energy/renewables/transparency\\_platform/action\\_plan\\_en.htm](http://ec.europa.eu/energy/renewables/transparency_platform/action_plan_en.htm)

<sup>3</sup> In Article 3(4) and 5(5)

<sup>4</sup> Either biogas upgraded to the quality of natural gas or gas of similar quality produced from biomass by other production methods.

to each natural gas consuming sector a portion of the biogas injected to the natural gas network, proportional to each sector's natural gas consumption. The Commission considers that it is of interest to further explore the accounting of biomethane from the grid, in parallel

to those for electricity and hydrogen from renewable sources. This public consultation, in section C, seeks views on whether other accounting methods could be appropriate to apply for this.

The consultation is open from 14/04/2011 and closes on 14/06/2011.

This questionnaire exists only in English, but responses can be in any EU language.

If you have views on some questions and not others, feel free to send an answer covering only these questions.

Contributions will be published: [http://ec.europa.eu/energy/consultations/index\\_en.htm](http://ec.europa.eu/energy/consultations/index_en.htm)

*This document has been prepared by the Commission services as a basis for comments. It does not prejudice the final form of any decision to be taken by the Commission.*

## Réponse de DIESTER INDUSTRIE

**DIESTER INDUSTRIE est une société française, c'est également le principal producteur de biodiesel au niveau européen.**

### **Section A: Electricity from renewable sources in transport**

According to the National Renewable Energy Action Plans, Member States estimate that the contribution of renewable electricity will by 2020 account for approximately 1% of energy consumed in transport: 0.8% in non-road transport (mainly in trains) and 0.2%<sup>5</sup> in road transport, including electric cars, trolleybuses, etc.

Given that electricity is generated from both renewable as well as non-renewable sources,

1. how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of electric vehicles?

**- Not significant**

2. under what condition do you think it would be justified to count the whole amount of electricity in electric vehicles as renewable?

**- None**

**En effet, il serait contraire à la Directive 2009/28/CE de comptabiliser des sources d'énergies non renouvelables comme étant des sources renouvelables. Cela ne serait par ailleurs pas équitable vis-à-vis des autres énergies renouvelables.**

3. what benefits do you expect the option you selected under (2) will have:

**- None, it only changes the accounting method**

**Le mode de calcul retenu par la réponse à la question (2) incitera certainement les Etats membre à promouvoir l'électricité d'origine renouvelable.**

4. what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:

**- None**

<sup>5</sup> This 0.2% counts however with a multiplication factor of 2.5 towards the 10% target - Cf. Article 3(4) of the Directive.

## **Section B: Hydrogen from renewable sources in transport**

According to the National Renewable Energy Action Plans, only one Member State estimates that hydrogen from renewables will be used in transport by 2020.

1. Which are in your view the most likely ways to produce hydrogen from renewable sources (partly or fully) by 2020?
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**- None are likely to be significant by 2020**

2. For each option you selected under (2), if it would be used for transport, how would you suggest to calculate its contribution to the 10% target for renewable energy in transport?
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**Il conviendrait de prendre en compte l'hydrogène provenant de la gazéification de la biomasse ainsi que celui provenant de l'électrolyse de l'eau avec de l'électricité d'origine renouvelable.**

## Section C: Biomethane via the natural gas grid in transport

According to the National Renewable Energy Action Plans, Member States estimate that biofuels other than first and second generation bioethanol and biodiesel will by 2020 account for approximately 0.2% of energy consumed in transport, part or all of which may be biomethane.

Given that methane in the gas grid originates mostly from non-renewable sources (natural gas),

1. how do you value the impact of the 10% target for renewable energy in transport by 2020 on the development of methane vehicles fuelled by methane from the gas grid?

**- Not significant**

2. under what condition do you think it would be justified to count the whole amount of methane extracted from the gas grid for the use in vehicles as renewable?

**- None, until the time that all methane injected into the gas grid concerned is originating from renewable sources**

3. what benefits do you expect the option you selected under (2) will have:

**- None, it only changes the accounting method**

**La part de biométhane injectée dans le réseau de gaz doit être utilisée pour calculée la contribution du biométhane dans l'atteinte de l'objectif de 10%.**

**Cela permettra de contribuer au développement de la production de biométhane.**

4. what costs in terms of administrative burden do you expect the implementation of the option you selected under (2) will have:

**- None**

## **Section D: Energy content of biofuels**

According to the National Renewable Energy Action Plans, Member States estimate that the contribution of biofuels will be approximately 9.5% of energy consumed in transport, most of which is expected to be biodiesel and bioethanol.

1. Do you think additional types of biofuels need to be listed in Annex III of the Directive? If yes, which ones and could you provide values?
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**Non, cela ne nous semble pas nécessaire.**

2. Do you think more precision in terms of decimals is necessary in the values in the Annex? If yes, could you provide such values?
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**Non, cela ne nous semble pas nécessaire.**