

**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**

**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?***

Answer: Significant, but other policies/developments will be of more importance

Note: We are on the position that the RED transport target has established a good potential for developments, however some additional measures are needed.

**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?***

Answer: - When there is a supply contract showing that that amount of biomethane was generated

- When the methane comes with a tradable certificate showing that that amount of biomethane was generated

Note: We would prefer option 3 but option 2 is also acceptable. After the biomethane was generated it can be used for heating, steam production or biomethanol production.

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

Answer: Additional biomethane generation

Note: In case natural gas consumption is growing in transport biomethane might be the source of this increase and replace fossil fuel consumption in transport. Natural gas consumption would be unchanged.

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

Answer: Other

Note: Rather low administrative burden as it would just require the measurement of the gas used in the transportation sector and measurement and proof of renewable origin of biogas used for heating or steam production where the biogas is produced. Controlling can be provided under the scope of sustainability reporting.

## **Section D: Energy content 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?***

Answer: Yes

Note: TAEE; biomethanol from biogas

- 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?***

Answer: No need for additional decimal values.