

JOINT LETTER TO MEMBER STATES' REPRESENTATIVES

Call to reject a 35bcm biomethane target in the Gas and hydrogen markets Regulation

Date: November 22th 2023

The co-signatories represent a mounting coalition of independent not-for-profit organisations active in the fields of food security, sustainable land use, clean transportation and climate change mitigation, who are concerned about the major environmental risks associated with a 35 billion cubic meter (bcm) biomethane target.

As the inter-institutional negotiations on the joint Gas and hydrogen markets Directive and Regulation are underway, we urge Member States not to bow to pressure from the European Parliament and to reject all mentions to a biomethane target in the Gas and hydrogen markets Regulation.

In particular, we call on Member States to reject the Parliament amendment article 3.c introducing a binding 35bcm biomethane target by 2030 and to reject the mention to a 35bcm target in the amendment article 17a.

No impact assessment has been carried out on the proposed 35bcm biomethane target and Member States should be aware that the European Commission study¹ quoted by the Parliament (in added preamble paragraph 14a) to justify the target actually concludes that a much lower level of 24bcm (259TWh) of biomethane could be produced sustainably by 2030.

The 35bcm figure has no independent scientific grounding. It originates from an industry report that had initially considered the supply potential of biomethane in the EU-27 AND UK and was subsequently picked-up by the European Commission in the RePowerEU action plan in the face of enormous political pressure to wean the EU off part of the imported Russian gas.

Whilst we support the aim of increasing EU energy independence and acknowledge that there is a niche role for biomethane production from unavoidable organic waste streams, the volumes of biomethane produced will need to be much smaller to avoid negative impacts on food security, the environment and the climate as confirmed by independent research².

We urge Member States to reject all mentions to a 35bcm biomethane target in the Gas and hydrogen markets Regulation.

We request a target-setting process that is independent, evidence-based and conducted in conjunction with sustainable food and land use experts to ensure that EU biomethane production helps rather than hinders climate and sustainability goals.

¹ European Commission, Directorate-General for Energy, Joint Research Centre, Bossmann, T., Cornaggia, L., Vautrin, A. et al., Assistance to assessing options improving market conditions for bio-methane and gas market rules – Final report, Publications Office, 2021, <https://data.europa.eu/doi/10.2833/912333>

² Amongst others: Feedback EU report: Biomethane. Setting a target that is fit for food and the climate <https://feedbackeu.org/wp-content/uploads/2023/11/FeedbackEU-Biomethane-Report-Setting-A-Target-That-Is-Fit-For-Food-And-The-Climate.pdf>; Agora Energiewende (2023): Breaking free from fossil gas. A new path to a climate-neutral Europe. https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021_07_EU_GEXIT/A-EW_292_Breaking_free_WEB.pdf; Yuanrong Zhou et al., "Life-Cycle Greenhouse Gas Emissions of Biomethane and Hydrogen Pathways in the European Union" (ICCT,n.d). <https://theicct.org/publication/life-cycle-greenhouse-gas-emissions-of-biomethane-and-hydrogen-pathways-in-the-european-union/>.

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