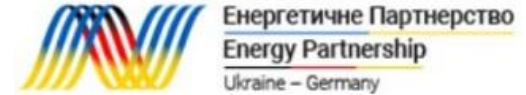


Toni Reinholz, dena, 27.09.23, Wien

Establishment of a Biomethane registry in the context of biomethane trade regulations and challenges

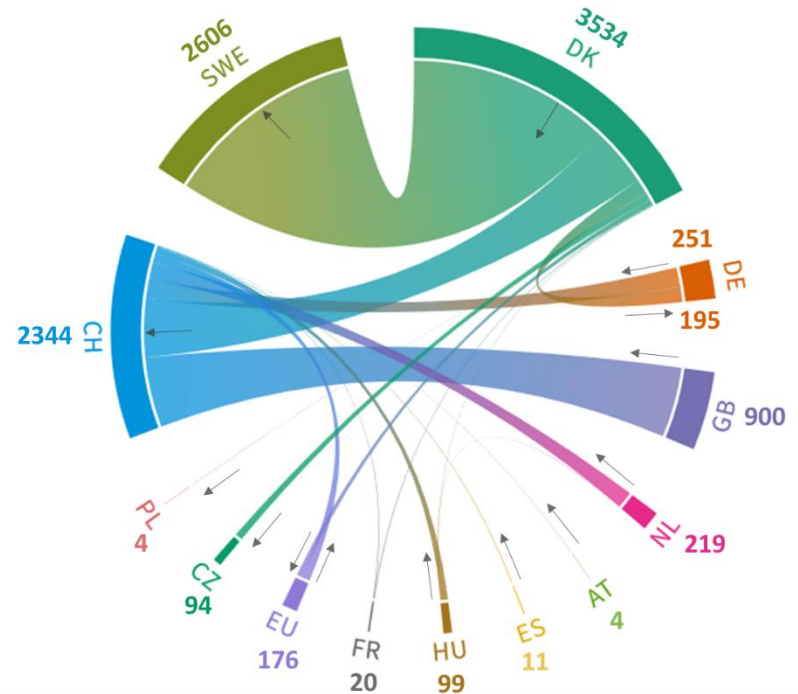
Development of a Ukrainian biogas registry

- **Dena supports Ukraine in the development of the registry within the German-Ukrainian energy partnership**
- **Software development has already been commissioned**
- **Timeline foresees the completion by the end of the year**
- **Main purpose:**
 - Documentation of sustainability, excluding double counting
 - Connection to other EU registries for export
 - to confirm to customs service that only biomethane was exported



International market for biomethane

- Currently, approx. 40 TWh of biomethane is produced in the EU
- Cross-border trade in 2022 amounts to approx. 3.5 TWh
 - Countries of origin mainly DK, NL and UK
 - Destination countries mainly DE, SWE and SUI
- Mainly short term deliveries because of different uncertainties



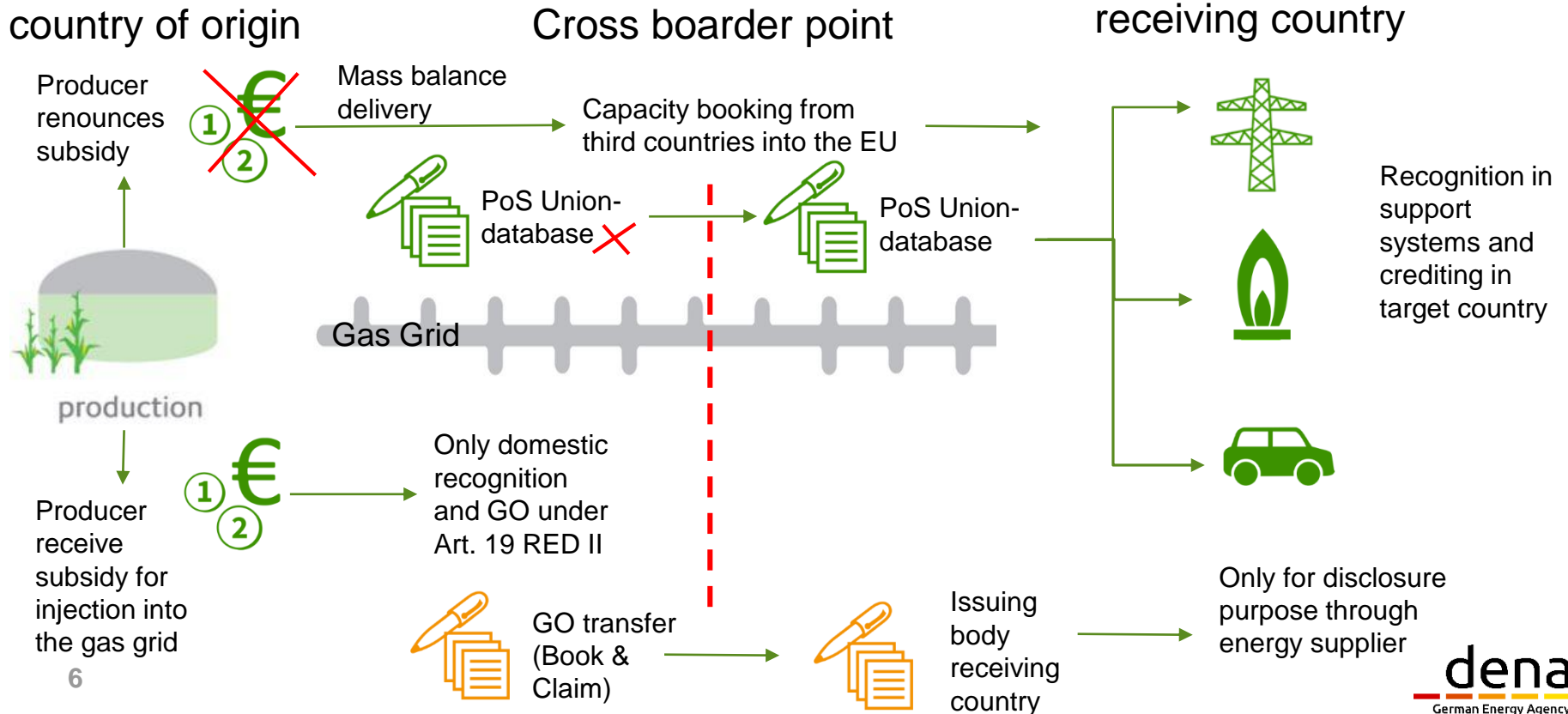
No standardised requirements for the international trade of biomethane (1/2)

- **Art. 31a No. 2 RED III and Art. 19 d Implementing Regulation for voluntary schemes consider an interconnected gas system as single mass balance system**
 - Regulation refers exclusively to the gas network within the scope of the RED
 - In this context voluntary schemes see no need for capacity bookings at the border crossing points in the gas grid any longer
- **But, how you handle imports from third countries like Ukraine?**
 - German custom service won't accept biomethane for transport targets from third countries which were transferred via the gas grid

No standardised requirements for the international trade of biomethane (2/2)

- **Unsufficient rules regarding the statistical transfer between member states via EUROSTAT Shares-Tools**
 - Can MS accept mass balance transferred biomethane volumes within national support schemes when volumes are counted in the origin country for RED or EU ETS targets?
- **Consideration of already subsidized biomethane in national support schemes**
 - How should double or multiple support be considered in the state's own support mechanisms?
 - How does this fit in with competition law?

possible requirements for biomethane imports



Conclusion

- **Lack of clear requirements for the import of biomethane and the target credit lead to uncertainties in the trade and use of biomethane**
 - Makes it difficult to establish long-term supply contracts and thus investment decisions for the extension of biomethane production
- **explicit requirements for imports from third countries support the establishment of biomethane trade with Ukraine**
- **The same challenges will arise when trading green hydrogen cross boarder via gas grid**
- **For a consistent approach requirements should come from EU Level**

The background features a vertical gradient from purple on the left to green on the right. Overlaid on this are numerous glowing, circular light trails in shades of pink, orange, and yellow. In the center, a silhouette of a person in a suit stands with their back to the camera, looking towards the light trails.

Thank you for your attention.

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dena

German Energy Agency