

Dear Mr. Dekker, dear Mrs. Cancian,

Re: Response to the your letter on behalf of the European biogas sector dated 27 November 2023

Thank you very much for your interest in our latest report on the potential for biomethane production in the EU entitled *Biomethane: Setting a target that is fit for food and the climate*, which featured in a recent [Euractiv article](#)".

We are pleased to respond to the points that you have raised in relation to our research.

Regarding the **biomethane potential calculated by JRC**, we refer to paragraph 8.2.1.3 on p.280 of the Assessment report¹, which states that "For the most sustainable scenario [...], by 2030, [...] potentials equal 428 TWh/y of biogas, including 259 TWh/y of biomethane". Using the EBA's conversion factor of 10.61 kWh/m³ this means a **total biomethane potential of 24bcm** (259 Twh). The remaining 169TW/y of biogas calculated by JRC assessment would be used for electricity and heat production and cannot be considered to replace natural gas in the form of biomethane as envisaged in RePowerEU.

Please note that Feedback's analysis shows that this is **likely to still be too high from a sustainability perspective**, especially given the lack of consideration of the scientific consensus on livestock production and climate change, and the significant issues around sequential cropping and agricultural residue feedstock availability. However, specific **targets should be set by an interdisciplinary group of independent scientists, including food system experts** as set out in our policy recommendations.

We are **interested in hearing the industry's response** to our detailed analysis of the latest available scientific literature on **sequential cropping** including **issues around assumed yields and methane leakage**, which are set out in section 4.2 starting on p.32 of our report. Likewise, we would be interested in hearing the industry's response to our detailed analysis of **food waste and industrial wastewater feedstocks** set out in chapter 5 starting on p. 48 of our report.

We share your interest in an open dialogue that foster ongoing communication and knowledge exchange. To that effect, we are currently consolidating a group of experts from interested civil society groups to form the basis of an independent target-setting process for biomethane production in the EU. We would be happy to involve the European biogas sector in that process and will get back to you accordingly, also for a specific discussion on points raised above.

We have already planned a webinar on 6th December to present the findings of our report and are delighted of this opportunity to reiterate the invitation already made via the European Commission to members of Task Force 3 of the Biomethane Industry Partnership which as you know are working on *Assessing sustainable potential for innovative biomass sources to produce biomethane* but whose names unfortunately are not publicly available.

Yours sincerely,

¹ European Commission. Assistance to assessing options improving market conditions for bio-methane and gas market rules – Final report. Directorate-General for Energy, Joint Research Centre, Bossmann, T., Cornaggia, L., Vautrin, A. et al. (2021).



Frank Mechielsen
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