

AFIR Review Call for Evidence

Eurogas Response

As already recognised in the RED, renewable and alternatives fuels will play a crucial role in decarbonising hard-to-abate sectors such as maritime and heavy-duty road transport. Eurogas fully supports the Commission's effort of scaling up Europe's renewable fuel production and distribution infrastructure. The Sustainable Transport Investment Plan and the EU Industrial Maritime Strategy already propose important measures to increase funding for new projects (first and foremost earmarking ETS revenues for reinvestment in the maritime sector) and demand to ease the trading of renewable and alternatives fuels (notably through the Union Database). We encourage decision makers to follow-up with implementation measures in the shortest timeframe possible.

While the legal framework supporting the decarbonisation of maritime transport can be considered overall satisfactory, as it leaves enough space for the market to develop and scale up – including the freedom for fleet operators to choose the fuel that is best suited to support their business model – we urge the Commission to review the approach adopted for heavy-duty road transport.

The AFIR currently only foresees minimal distance deployment requirements for recharging and hydrogen refuelling on the TEN-T network. This excludes valid alternatives such as methane (in compressed and/or liquid form, notably CNG and LNG), which can be fully decarbonised if originating from biological feedstocks (biomethane) or is synthetically produced (e-NG).

Biomethane has a strong decarbonisation potential which, depending on the feedstock, can even be carbon negative, as in the case of manure. Moreover, using biomethane also contributes to the circularity of our economy by valorising what otherwise would be considered waste.

Today, the distribution of CNG/LNG refuelling stations is currently unevenly distributed across Member States which limits its utilisation. Also, the amount of biomethane in the CNG/LNG-mix varies considerably, as some countries, like Germany, already offer a fully decarbonised mix.

In that regard, Eurogas urges the Commission to amend the text to include an obligation for Member States to ensure that enough CNG/LNG refuelling stations are deployed along the TEN-T core network and urban nodes. In the context of heavy-duty road transport, this fuel is particularly important as it fully aligns with the EU's emission reduction targets for CO₂ and other polluting substances, is competitive with very interesting TCO results for operators, and fills the range gap.