

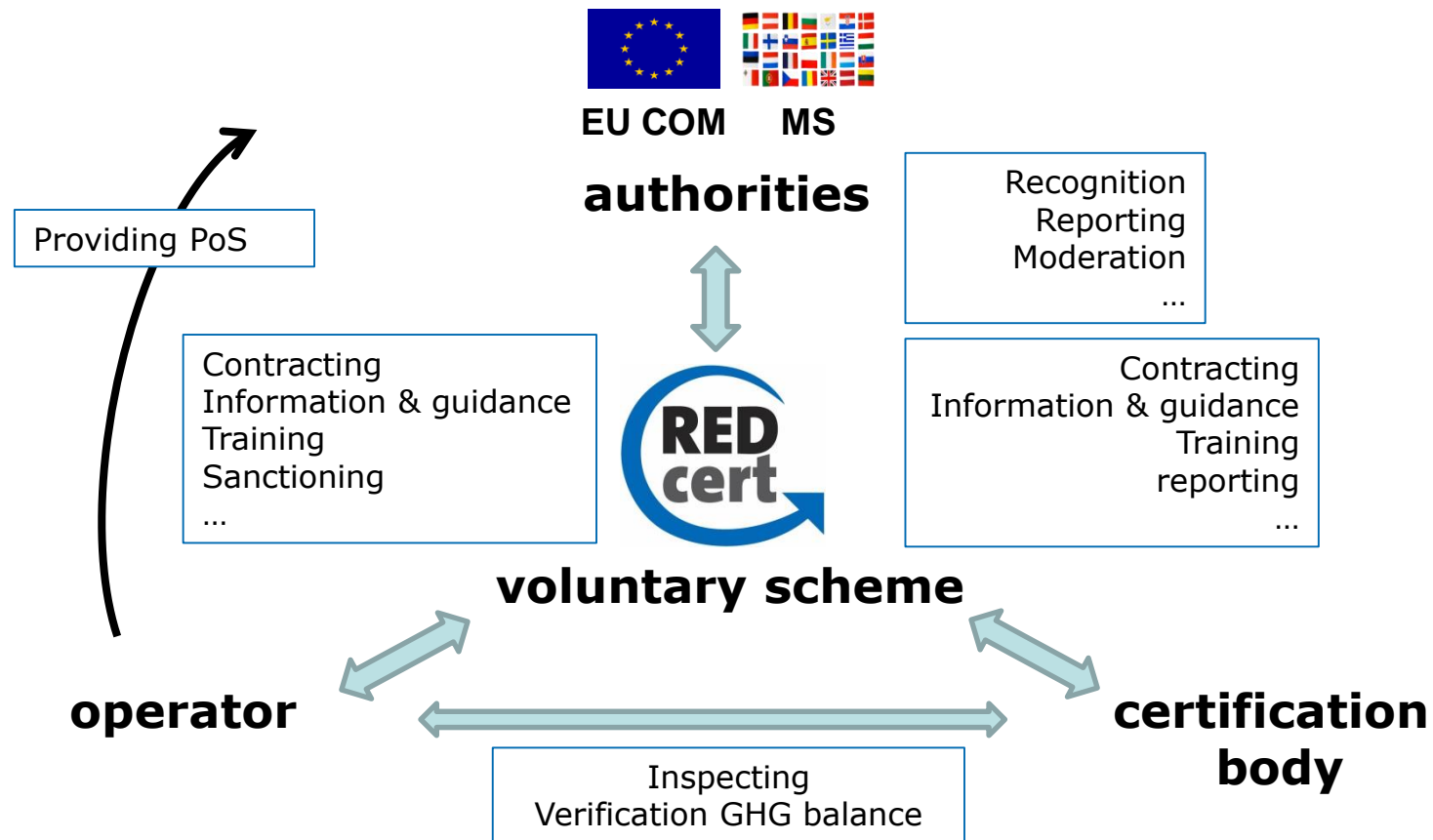


The role of sustainability schemes

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Peter Jürgens
REDcert GmbH

Role of voluntary schemes



Scheme as a service



Certification under a recognized scheme is mandatory to provide sustainable feedstock/biofuels to the market.

A scheme has to lay down all requirements by documentation.

Is this enough...?

What about

- Information and update on developments concerning sustainability
- Training on mass balance requirements and GHG calculation
- Integrity management (protection of the scheme)

...

REDcert's self-conception is 'service provider'!

Mass balancing

- VS are obliged to follow the mass balance approach defined by the COM – there's no space for ,ambitious interpretation`

Existing restrictions affect the definition of

- consignments
- spatial boundaries
- maximum time period of balancing

Challenge:

- The grid has to be accepted as a `mean of transport`
 - biomethane quantities entering/leaving the grid must be countable and provable (incl. loss/leakage).
 - cross border transport must be accepted on the same prerequisites like national transport

Inventing the wheel again...?



- Mass balancing is usually performed by each operator using his local equipment (warehouse management, accounting systems etc.). He can **himself** provide evidence for the balance.
 - Biomethane producers require a confirmation of a **third party** for the quantities injected to provide evidence.
 - harmonization on EU level...?
 - National restrictions (like in GERMANY)...?
- ➔ Therefor REDcert welcomes the ERGaR initiative to combine the existing tools and system for ‚biomethane traffic‘ in the grid and to get a recognition by the European Commission.

Handling the risk of double counting



To handle the risk of double counting REDcert requires

- Full access to all operations and relevant documentation of feedstock/biofuel und the RC scheme but also under different schemes as well as non-sustainable feedstock/biofuel on site.
- Full access to the PoS handed out to the market via an operators nabisy (or any other PoS-database) account
- Integrity management procedures facilitate REDcert to follow each hint/suspect/rumor of fraud and non-conformities like DC

But...

... as far as there's no consistent approach within the member states of

- registering and verification of PoS nor
- Common minimum requirements on the PoS data and its verification

there will be of course a higher risk of DC which the VS cannot handle alone !!

Transfer of state-aid related information



- Every reliable source of state-aid related information is welcome to assist the verification of
 - sustainability properties of biomethane
 - Accountability of biomethane quantities for national biofuel quota obligations

but

- the existing tools, databases and approaches must be
 - included in recognized VS,
 - should seek itself for a recognition or
 - should join forces and collaborate on a common platform like ERGaR

to assure a level-playing field with liquid biofuels !!

Outlook



- Biomethane should have a bigger share of the biofuel market (especially 2nd generation biofuels).
- Special infrastructure of the biomethane sector compared with liquid biofuels (grid transport) needs a convincing and recognized approach for mass balancing.
- European recognition of ERGaR should convince member states to lift off national barriers in the biomethane sector.