

Response of Federmetano on the European Commission consultation on the Alternative Fuels Infrastructure Regulation proposal

In Federmetano's view, the only way of achieving a quick decarbonisation of road transport is to support all existing solutions, including biomethane (both bioCNG and bioLNG).

As recognised by the European Commission in the Impact Assessment of the AFIR proposal, *"biogas and e-gases use the same refuelling infrastructure as natural gas. Fossil natural gas can therefore be increasingly blended and phased out with low-carbon and renewable fuels (biogas and renewable synthetic e-gas) and thus fully contribute to the climate-neutrality objective"* (p.19).

The CNG and LNG refuelling station network is therefore a **potent enabler for increasing the uptake of bioCNG/bioLNG and therefore for a drastic reduction in GHG emissions of road transport**. Earlier this year, Europe's gas fuelling station network has reached 4 000 CNG and 400 LNG stations. This network is crucial to support the decarbonisation of the 1.5 million natural gas vehicles which currently compose the European fleet, as well as future gas vehicles. **Biomethane (bioCNG and bioLNG) already represents 20% of the natural gas used in the European vehicles fleet, which contributes to reduce GHG emissions by more than 40% compared to gasoline (on a Well-to-Wheel basis). Moreover, natural gas vehicles and infrastructure can be a "bridge-solution" for a gradual/progressive introduction and use of hydrogen in road transport (methane-hydrogen blends), thus enabling an effective and prompt reduction of emissions at affordable costs.**

All these elements should have been better taken into account in the European Commission's proposal and related infrastructure targets. In order to ensure that the CNG and LNG refuelling stations are better supported across the EU, Federmetano has the following recommendations:

- **The infrastructure objectives are achieved maintaining an Alternative Fuels Infrastructure Directive**, in consistency with other related legislation (e.g. RED III). The national policy frameworks serve as a driver to achieve decarbonisation targets. Each country should be still given the possibility to implement renewable energy targets and to develop an alternative fuels infrastructure based on their priorities, resources and GDP, possibly following a common European methodology set out in the EU legislation and with a mechanism to control the implementation phase.
- **The AFID Directive should not anticipate the possible results of the revision of the CO2 standards for cars & vans as well as for heavy-duty vehicles by prematurely phasing-out support to CNG and LNG infrastructure**, which is key for the decarbonisation of road transport across the EU. In this phase it is essential to keep an approach of technology neutrality to decarbonisation.

- The AFID Directive should act in a coherent and complementary way with the Renewable Energy Directive, which already defines the types of fuels that should be produced and used to decarbonise road transport. The new sub-categories of alternative fuels introduced in the European Commission's proposal are not based on any clear legal criteria and bring additional unnecessary complexity to the overall FF55 framework. Instead, the definition of "*alternative fuels*" within the AFID should rather mirror the definitions of the REDII, and clearly include advanced biofuels such as bioCNG and bioLNG within its scope.
- Reintroduction of provisions to support the development and maintenance of CNG refuelling stations. While the number of CNG stations is growing steadily, distribution across Europe remains highly uneven. Additional investments are therefore needed to build and maintain a comprehensive network of CNG refuelling stations that is necessary to increase the uptake of bioCNG in road transport.
- Extension of the support to LNG refuelling stations beyond 2025. With a high blend of bioLNG achievable in the medium term, LNG is a mature, affordable and necessary technology to accelerate the decarbonisation of heavy-duty transport, since it is the **only immediately viable alternative fuel to diesel** for this specific sector. While the LNG stations network is developing quickly, in some areas of Europe it still remains largely insufficient to match the growing demand for bioLNG and increasing numbers of LNG trucks in Europe. It is therefore crucial to extend support measures for the development of LNG stations across the European Union beyond 2025.

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