

IOGP response to EC consultation on the review of REDII

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 90% of oil and gas produced in Europe. IOGP supports the goals of the Paris Agreement and the EU's objective of climate neutrality by 2050, and will work with the Commission to help create the essential measures to enable this energy transition. Many challenges must be overcome to meet the Green Deal's ambition, and the energy transition requires significant investments, new technologies, effective policies and behavioural changes.

On 8 July 2020, the Commission presented the Communications 'EU Strategy for Energy System Integration' (ESI Strategy) and 'A hydrogen strategy for a climate neutral Europe' (Hydrogen Strategy). The ESI and Hydrogen Strategies propose several actions that could require the modification of REDII which were addressed in the Commission's inception impact assessment concerning the REDII review. IOGP has provided feedback to the Commission's inception impact assessment and welcomes the opportunity to provide further feedback in this consultation on the review of REDII.

IOGP recommends that the revision of REDII considers amending the Directive in order to:

- Enable that low-carbon solutions of non-renewable origin can effectively contribute to the purpose of REDII in reducing GHG emissions in line with the targets set by the EU: low-carbon and renewable fuels should be accepted in the framework of the revision of REDII and should be evaluated on the basis of their life-cycle GHG emissions and not origin, according to the same methodology. Where the EU framework defines targets and support measures to incentivise decarbonisation those should be open to renewable and low-carbon solutions based on the GHG saving they can achieve, while allowing Member States to choose their level of ambition and support policy.
- Recognise the role that CCS can play in reducing GHG emissions in the short- and medium-term and in creating negative GHG emissions in the longer term: the EU will need Carbon Capture & Sequestration (CCS) and thus REDII should be revised to encourage the uptake of CCS.
- Ensure that renewable and low-carbon gases can fully contribute to the achievement of the EU climate ambition: While the Hydrogen Strategy aims to prioritise the development of renewable hydrogen, it acknowledges that in the short- and medium-term other forms of low-carbon hydrogen are needed. Expanding the scope of REDII to include low-carbon hydrogen could help towards providing a business case for the development of new low-carbon hydrogen facilities as well as retrofitting existing hydrogen facilities with CCS. In addition, targets set under the revision of REDII should be set in a manner that renewable and low-carbon hydrogen are eligible. This would allow for more rapid scale-up of hydrogen demand and the development of hydrogen infrastructure, which would then support the uptake of renewable and low-carbon hydrogen. Despite the increasing focus on hydrogen, it is important to continue to recognise the high potential of biomethane in reducing GHG emissions and achieving climate neutrality.

- Establish a comprehensive terminology in a single legislative instrument that covers both renewable and low-carbon fuels applying a consistent EU wide methodology on a GHG life-cycle basis: For hydrogen produced through steam reforming, the life-cycle GHG emissions depend to a large extent on carbon capture rate in the low-carbon hydrogen facility. The life-cycle GHG emissions of electricity-based hydrogen depend to a large extent on how the electricity that drives the electrolyzers is produced. By amending REDII, renewable and low-carbon hydrogen could be accommodated under a single Directive.
- Establish a robust certification system for renewable and low-carbon hydrogen by amending the provisions on Guarantees of Origin under REDII: A credible and robust certification system at EU level is essential to ensure that the GHG savings of the different production pathways of hydrogen are captured and rewarded. The revision of REDII should aim to introduce a functional EU-wide system of Guarantees of Origin for renewable and low-carbon fuel certification.
- Include life-cycle GHG performance for all low carbon and renewable fuels into the Guarantees of Origin information: In order to determine the GHG impact of renewable and low carbon fuels, a life-cycle GHG emission assessment is required. As a first step, default GHG emission values should be defined for each standard production process with specific inputs for parameters which significantly affect GHG performance and the possibility to add new or improved processes based on independent verification. Information on life-cycle GHG emissions should be provided for all renewable and low-carbon fuels using consistent criteria, and should be included in the Guarantees of Origin to provide reliable information to customers on the sustainability of renewable and low-carbon fuels.
- Ensure a technology neutral approach in setting possible targets and providing support mechanisms: We note that the Commission as well as Member States will consider establishing targets such as minimum shares or quotas for renewable hydrogen in specific end-use sectors. Although this could help create a market by driving demand for hydrogen, we believe that the approach should be carefully assessed as it may lead to diversion of renewable electricity to hydrogen production simply to meet the target, without delivering additional GHG savings. Where hydrogen is produced using electricity from the grid, GHG emissions may well increase. We strongly recommend that all policy options (including targets) are assessed in order to ensure their consistency with other policy measures, and all forms of renewable and low-carbon fuels are considered eligible. The amended REDII and EU ETS should complement each other to stimulate investments in renewable and low-carbon solutions.
- Enable all hydrogen production technologies which can deliver significant GHG emission reductions to compete on a level playing field: According to the Hydrogen Strategy, hydrogen production from natural gas with CCS and a capture rate of 90% has well-to-gate GHG emissions of 1 kgCO₂eq/kgH₂, whereas well-to-gate GHG emissions for electricity-based hydrogen for the (2018) EU electricity mix are 14 kgCO₂eq/kgH₂. This demonstrates the importance of a life-cycle approach and that natural gas based hydrogen with CCS can deliver significant GHG emission reductions provided it can compete on a level playing field. We notice in the Hydrogen Strategy that the Commission will consider setting a low-carbon threshold for the promotion of hydrogen production installations. If this is introduced, it should be set in a technology neutral manner that is open to all hydrogen production technologies and based only on life-cycle GHG emissions.
- Provide regulatory predictability by avoiding that the possible changes to the Directive are disruptive to the long-term investment perspective provided under REDII. To ensure that the upcoming revision of REDII has positive impacts on economic growth and investments, investors need to have confidence in the stability of the regulatory framework. Possible changes to the Directive should not, therefore, undermine the long-term investment perspective. We would also recommend to implement some 'grandfathering' or 'no retroactive' clauses for first movers. This would ensure that the production of the fuel, which meets the requirements, can continue and will be considered compliant regardless of any subsequent changes to the mandate.
- Avoid overlapping with existing legislation: provisions under FQD/7A should be replaced entirely by the modified REDII.

The upstream oil and gas industry stands ready to provide further input to the revision of REDII and play its role in delivering low-carbon solutions aimed at tackling climate change.

Consultation on the Review of Directive 2018/2001/EU on the promotion of the use of energy from renewable sources

Fields marked with * are mandatory.

Introduction

This consultation aims to collect views and suggestions from stakeholders and citizens in view of the possible proposal for a revision of Directive 2018/2001/EU on the promotion of the use of renewable energy (RED II), planned for 2021.

Renewable energy is produced using the earth's natural resources, like sunlight, wind, water resources (rivers, tides and waves), heat from the earth's surface, or biomass. Using renewable energy, instead of fossil fuels, substantially reduces the emission of greenhouse gases, which is why renewable energy is also referred to as 'clean energy'.

Today, the energy sector is responsible for more than 75% of the EU GHG emissions, so increased uptake of renewable energy alongside energy efficiency has a key role to play in reducing GHG emissions in a cost-effective way. More energy from renewable sources also enhances energy security, creates growth and jobs, reduces air pollution when not based in combustion and strengthens the EU's industrial and technological leadership.

The review of RED II is carried out in the context of the European Green Deal[1] in which the Commission committed itself to review and propose to revise, where necessary, "the relevant energy legislation by 2021.

In the European Green Deal the Commission proposed to increase the Union's 2030 greenhouse gas (GHG) reduction target from 40% to at least 50% to 55%, with the objective of climate-neutrality by 2050.

On 17 September 2020, the Commission published its 2030 Climate Target Plan, which presents a new 2030 target of at least 55% net GHG emission reductions compared with 1990 levels on basis of a comprehensive impact assessment. Achieving at least 55% net GHG emissions reductions would require an accelerated clean energy transition with renewable energy seeing its share reaching 38% to 40% of gross final energy consumption by 2030.

This range of 38% to 40% is higher than the binding Union level target for 2030 of at least 32% of energy from renewable energy sources introduced by RED II. It is also higher than the share of renewables, between 33.1% and 33.7%, that would be achieved if Member States complied with the national contributions set in their integrated National Energy and Climate Plans (NECPs) for 2030.

In addition, the Commission has adopted, or will adopt, other strategies containing a number of key actions supporting the increased climate ambition, which could be followed through in the review of REDII. This is the case, for instance, of the Energy System Integration[2] and the Hydrogen Strategies[3], adopted on 8 July 2020, the Renovation Wave Strategy[4], adopted on 14 October 2020, and the Offshore Renewable Energy Strategy, planned for 19 November. In addition, the European Green Deal includes a "Green Oath to do no harm", in particular by preserving biodiversity and reducing air pollution. To this end, the Commission adopted on 20 May 2020 an EU Biodiversity Strategy for 2030, which also contains commitments of relevance for the REDII review.

The answers to this questionnaire will feed into the review process of RED II, and more in particular into the impact assessment that the Commission will carry out to assess whether a revision is needed and what revision would be the most appropriate. No evaluation of RED II will be done, since this Directive, adopted in December 2018, has not yet been transposed and implemented by Member States (its transposition deadline is on 30 June 2021), and a full-fledged evaluation of Directive 2009/28/EC (RED I) was done in 2016 when preparing the proposal for RED II.

The questions are formulated to respect the requirements of the Better Regulation rules[5]. The questions are divided into different sections: questions about the identity of respondents, general questions on revising RED II, questions on transversal elements derived from the Energy System Integration and Hydrogen Strategies, and technical questions on specific aspects of RED II, including questions on buildings and offshore renewables, in line with the Renovation Wave and the Offshore Renewable Energy Strategy. If you don't have an opinion on a question, do not reply.

- [1] COM(2019) 640 final
- [2] https://ec.europa.eu/energy/sites/ener/files/energy_system_integration_strategy_.pdf
- [3] https://ec.europa.eu/energy/sites/ener/files/hydrogen_strategy.pdf
- [4] https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave_en#documents
- [5] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en

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Please note that this questionnaire will be available in all EU-languages as from 09/12/2020.

About you

* Language of my contribution

* I am giving my contribution as

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1. General questions on the review and possible revision of the Renewable Energy Directive

REDII provides a general framework for the promotion of energy from renewable within the Union in order to ensure the achievement of the binding EU renewable energy target of at least 32% by 2030. It sets out rules on support schemes for renewable energy, on guarantees of origin for energy from renewable sources, on administrative procedures, on the integration of renewable sources in buildings, on selfconsumption and renewable energy communities, and on renewable energy in heating and cooling and in transport. It also sets out sustainability and GHG emissions criteria for bioenergy.

On 17 September 2020, the Commission published its 2030 Climate Target Plan, where it presents an at least 55% net target for GHG emissions reduction in 2030. As result of this increased ambition, the plan indicates that renewables should represent from 38% to 40% of the gross final energy consumption in 2030.

1.1 How important do you think renewable energy will be in delivering the EU's higher climate ambition for 2030 and carbon neutrality by 2050?

- Very important
- Important
- Not very important
- Not important

1.2 Do you think REDII needs to be modified? (multiple answers possible)

- Yes, it needs to be more ambitious as result of the higher climate ambition in the European Green Deal and Climate Target Plan
- Yes, it needs to be more prescriptive to ensure that the EU renewable energy objectives are reached
- Yes, it needs to be less prescriptive, giving Member States more freedom on how to achieve their renewable energy objectives
- Yes, but only those adjustments required to reflect the European Green Deal objectives
- No, it strikes the right balance as it is
- No, even if there could be areas of improvement, legislation should not be modified so shortly after its adoption
- Other

Comment Question 1.2:

REDII should be modified to enable all renewable and low-carbon solutions (including hydrogen production technologies with CCS) that can deliver significant GHG emission reductions to be included in the EU's decarbonisation framework. Furthermore REDII should be amended to establish a functional EU-wide system of Guarantees of Origin for renewable and low-carbon fuel certification that has standardised life-cycle GHG emissions at the core of the design of GOs, in line with point 5.4 of the December 2020 Council conclusions. Where the EU framework defines targets and support measures to incentivise decarbonisation those should be open to renewable and low-carbon solutions based on the GHG saving they can achieve, while allowing Member States to choose their level of ambition and support policy.

1.3 If you answered 'yes' to the previous question, which parts of RED II do you think should be amended? (multiple answers possible)

- Overall Union target of at least 32% for renewable energy for 2030
- Target of at least 14% for renewable energy in transport by 2030.
- Indicative target of an annual increase of 1.3% point for renewable energy used in heating and cooling
- Indicative target of an annual increase of 1% point for renewable energy used in district heating and cooling and provisions on access to district heating networks
- Provisions on how to design support schemes for electricity from renewable sources
- Provisions on cooperation mechanisms between Member States
- Provisions on how to promote renewable energy in buildings
- Provisions simplifying administrative procedures for renewables project developers
- Requirements on guarantees of origin for energy from renewable sources
- Provisions on self-consumption and renewable energy communities
- Sustainability and GHG emission saving criteria for energy produced from biomass
- Provisions on sustainable low carbon fuels such as low-carbon hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production
- Other

Please explain your answer

Comments Question 1.3

Natural gas based low-carbon hydrogen with CCS can deliver significant GHG emission reductions and should therefore be included in the amended REDII scope alongside renewable fuels in order to deliver on the EU's higher decarbonisation ambitions. Therefore the revision of REDII should include provisions to support the role of low-carbon solutions in the energy transition and their eligibility towards the Union targets in the revised REDII. In particular low-carbon hydrogen with CCS can play an important role in reducing GHG emissions in carbon intensive sectors where other alternatives, such as electrification, might not be feasible or have higher cost.

1.4 In which sectors do you think additional efforts to increase the use of renewable energy are most needed for a potentially higher renewables target for 2030? (multiple answers possible)

- Electricity
- Gas
- Heating and cooling
- District heating and cooling
- Buildings
- Services (including ICT)
- Industry
- Transport
- Agriculture
- Other

Comments Question 1.4

We have selected all sectors above under the premise that a higher renewables target includes all renewable and low-carbon solutions that can contribute to the EU's higher decarbonisation targets. The increased EU decarbonisation target for 2030 and the 2050 carbon neutrality target necessitate accelerated emissions reduction efforts. Expanding the scope of REDII to include low-carbon solutions can help to intensify decarbonisation efforts in sectors not covered by EU-ETS. REDII has served as an important instrument to increase the use of renewable energy. However, expansion of renewable energy is a tool to achieve the decarbonisation target and should not constitute a goal in itself. Integrating renewable and low-carbon solutions in the revised REDII enables all renewable and low-carbon solutions to collectively work towards decarbonisation of the energy system in an effective and cost-efficient manner. In effect, the amended REDII should become an important part of mainstreaming renewable and low-carbon energy in order to increase decarbonisation across each of the above sectors.

1.5 Do you see scope for simplifying RED II or reducing regulatory burdens, including administrative burdens?

Comments Question 1.5

Yes, IOGP believes there is scope for simplifying REDII and reducing regulatory burdens. The revision of REDII could establish a single regulatory mechanism for Guarantees of Origin for renewable and low-carbon fuels. Standardised life-cycle GHG emissions should be at the core of the design of GOs.

1.6 Do you think the level of the 2030 Union target for renewable energy should be raised within the range indicated in the 2030 Climate Target Plan (38 - 40%)?

- Yes
- No, it should be higher than 40%
- Other

1.7 Should the overall renewable target be binding at EU level or at national level?

- At both levels
- Only at EU level**
- Only at national level
- At neither of the levels

2. Technical questions on Transversal Energy System Integration Enablers

In order to achieve climate neutrality cost-effectively the energy system needs to operate in a more integrated manner, across multiple energy carriers, infrastructures and consumption sectors. The Energy System Integration and Hydrogen Strategies published by the Commission in July set the vision to build an integrated energy system fit for climate-neutrality and turn hydrogen into a viable solution. This vision is established around three main pillars: 1) a more circular energy system, with 'energy-efficiency-first' at its core; 2) accelerating the electrification of energy demand, building on a largely renewables-based energy system; 3) promote renewable and low-carbon fuels, including hydrogen, for hard-to-decarbonise sectors.

2.1 How important do you consider the following measures to build a more integrated energy system?

	Very important	Important	Not very important	Not important
Apply the Energy-Efficiency-First principle across the whole energy system				
Increase the mobilisation of waste heat, for instance from industry or data centres				
Accelerate the deployment of smart district heating and cooling networks that use renewable energy and thermal storage				
Accelerate the use of renewable energy in buildings				
Accelerate the use of renewable electricity in industry				
Accelerate the use of renewable electricity in the transport sector				
Accelerate the production of renewable liquid fuels				
Accelerate the production of sustainable biogas and biomethane				
Increase the production and use of renewable hydrogen				
Accelerate the digitalisation of the energy system				

Any other view or ideas related to the use of renewables that could contribute to building a more integrated energy system? Please specify.

Comments Question 2.1

It is important that all low-carbon energy sources and carriers are considered, not only renewables, to help achieve the ambitious emission reduction goals across multiple sectors. Measures to enable a better integrated energy system should be set in a technology neutral manner that is open to all solutions (including hydrogen production technologies and biofuels) based on life-cycle GHG emissions. Low-carbon hydrogen with CCS can play an important role in the energy transition and will be needed as an enabler for the early adoption of hydrogen and to scale up for the development of renewable hydrogen, without which the overall outlook for hydrogen would be challenging.

The Energy System Integration Strategy recommends to advance towards a more circular energy system, with 'energy-efficiency-first' at its core.

2.2 How do you think the energy efficiency first principle should be reflected in the Renewable Energy Directive?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Promote the use of renewables in low-temperature efficient heating systems				
Promote the production of heat directly from renewable energy or waste heat with minimal energy transformation				
Promote the installation of thermal energy storage together with the renewable heat generator				
Promote self-consumption of renewable thermal heat				
Promote the reuse of waste heat from industrial sites, data centres, or other sources				
Promote the use of renewable electricity in end-uses across all sectors where this is cost-efficient				
Prioritise the efficient use of renewable electricity by taking into account conversion efficiencies of renewable electricity in different end uses (eg. heat pumps have better efficiency than using hydrogen for space heating)				
Provide information to consumers about the energy content of the energy they are purchasing, across carriers and sectors				
Prioritise the use of available renewable energy carriers in those end use sectors where they have the greatest decarbonisation impact for each unit of energy consumed				

Other? Please specify

Comment Question 2.2

2.3 How appropriate do you think the following measures would be in supporting the electrification of energy consumption?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Sectorial targets for electrification of end-use sectors				
Further specific measures for electrification of buildings				
Further specific measures for electrification of transport				
Further specific measures for electrification of industry				
Further specific measures for consumer empowerment				
Guidance to Member States to address the high charges and levies borne by electricity and ensure the consistency of non-energy price components across energy carriers				
Align taxation of energy products and electricity with EU Climate and Energy Policy goals				
Further measures to foster digitalisation				
Further development of interconnections				
Further development of transmission and distribution networks				

Other? Please specify

Comment Question 2.3

Electrification of energy consumption should not be considered as a goal in itself, but rather as a means to achieve decarbonisation where this is a cost-effective solution. In certain carbon intensive industrial processes, such as the steel or chemical sectors, electrification might not be feasible or have higher cost. Those sectors may achieve more efficient and affordable outcomes through the deployment of low-carbon fuels of non-renewable origin, such as natural gas based hydrogen with CCS. The revision of REDII should therefore create the conditions to enable those options.

Going beyond and building on the existing certification and traceability framework, the Energy System Integration Strategy and the Hydrogen Strategy state that the Commission will consider additional measures to support renewable and low-carbon fuels, possibly through minimum shares or quotas in specific end-use sectors (including aviation and maritime), through the revision of REDII and building on its sectoral targets. Renewable fuels cover sustainable biofuels, bioliquids and biomass fuels, as well as renewable hydrogen and renewable synthetic fuels. Low carbon fuels cover hydrogen and synthetic fuels produced through a variety of processes, but with significantly reduced full life-cycle greenhouse gas emissions compared to existing production. According to the Strategies, the support regime for hydrogen will be more targeted, allowing shares or quota only for renewable hydrogen. They also state that the Commission will propose a comprehensive terminology for all renewable and low-carbon fuels and a European system of certification of such fuels, based notably on full life cycle greenhouse gas emission savings and sustainability criteria, building on existing provisions including in the Renewable Energy Directive.

2.4 How do you consider that “low carbon” fuels that are not renewable but provide significant GHG emissions reduction compared to fossil fuels, such as non renewable hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production, should be treated?

- They should be promoted equally to renewable fuels and thus be mandatorily integrated in any end-use target or quota
- They should be promoted but less than renewable fuels
- Member States should have the freedom to decide whether to promote them alongside renewable fuels in any end-use target or quota
- They should not be promoted

2.5 Do you think the use of hydrogen and e-fuels produced from hydrogen should be encouraged (multiple answers possible)?

- Yes, regardless of the source used to produce them
- Yes, but only if produced from renewable energy
- Yes, but under a certain level of conversion losses
- Yes, but only if produced and used in a way that leads to no or low GHG emissions along their life cycle, compared to the fossil fuel they are replacing**
- Yes, but only when its whole value chain is more energy efficient in comparison to alternative energy sources and carriers
- Yes, but only for limited uses where no other alternatives are feasible
- No
- Other**

Comments question 2.5

IOGP supports a technology neutral approach and believe that all options that can reduce GHG emission – renewable as well as low-carbon fuels – should be considered on equal footing. Low-carbon hydrogen, produced from natural gas with CCS, offers a cost-effective way to reduce GHG emissions and will be needed as an enabler for the early adoption of hydrogen and to build scale for the development of hydrogen from additional renewable electricity.

2.6 How effective do you think the following measures would be in supporting the uptake of RES and low-carbon fuels?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Minimum shares or quotas of renewable and low carbon fuels, including renewable hydrogen, in specific end-use sectors			X	
Carbon Contracts for difference ^[1]	X			
Supply-side quotas			X	
Market based support schemes	X			
Supply-side GHG-based targets				

[1] Carbon contracts for difference are long term contract with a public counterpart that would remunerate the investor by paying the difference between the CO2 strike price and the actual CO2 price in the ETS in an explicit way, bridging the cost gap compared to conventional fossil-based production.

Comment Question 2.6

Key to a successful uptake of renewable and low-carbon fuels is that all renewable and low-carbon fuels are accepted in the framework of the revision of REDII and are evaluated on the basis of their life-cycle GHG emissions according to the same methodology. An immediate large-scale application in industry is to reduce emissions by retrofitting existing hydrogen facilities with CCS and to develop new low-carbon hydrogen facilities. This still requires substantial support from EU and Member State policies to bridge the gap between the costs of those measures and the price of carbon.

The uptake of renewable and low-carbon fuels requires different measures in each Member State given the differences in national circumstances. Potential EU-wide targets for specific technologies or for the share of renewable and low-carbon fuels in the energy mix would not be cost-effective as national circumstances are so different in each Member State.

We want to underline the importance of providing support to renewable and low-carbon solutions through competitive support schemes on the basis of GHG emissions reduction potential, such as carbon contracts for difference and market based support schemes, to allow for the most cost-effective decarbonisation outcomes.

2.7 How important do you think the following principles are for a robust and comprehensive certification and verification system covering all renewable and low carbon fuels? (Multiple answers possible)

	Very important	Important	Not very important	Not important
The certification and verification system should cover all end-use sectors	X			
The certification and verification system should cover all renewable and low carbon fuels	X			
The certification and verification system should demonstrate that renewable hydrogen and renewable synthetic fuels are produced from additional renewable electricity	X			
The certification and verification system should follow as closely as possible the real energy flows and ensure that consumption of renewable and low carbon fuels takes place in certain target sectors (e.g. transport) in the Union, for instance by using a mass balance system.				X
The certification and verification system does not need to follow the real energy flows as it is sufficient to incentivise the promotion of renewable and low carbon fuels independently of where they are consumed in the Union, for instance by using a book-and-claim approach such as for Guarantees of Origin.	X			
The certification and verification system should follow as closely as possible the real energy flows only for liquid renewable and low carbon fuels, but allowing a book-and-claim approach such as for Guarantees of Origin is more appropriate for gaseous renewable and low carbon fuels injected into the natural gas grid				X

The certification and verification system should ensure that the GHG impact of energy conversions along the value chain (e.g. renewable electricity used to produce renewable hydrogen) are fully taken into consideration, while avoiding double counting

X

Where CO2 is used in the production of a fuel, the certification system should distinguish between fuels using CO2 of fossil origin and CO2 of non-fossil origin

X

Other principles? Please explain

Comment Question 2.7

A robust and comprehensive EU-wide system of certification and verification covering all renewable and low-carbon fuels is essential for supporting the uptake of renewable and low-carbon fuels. The revision of REDII should aim to introduce a functional EU-wide system of Guarantees of Origin for renewable and low-carbon fuel certification. Standardised life-cycle GHG emissions should be at the core of the design of GOs. Such a certification system could form the basis for incentivising investments in renewable and low-carbon gas technologies. We support EU-wide acceptance of GOs and decoupling of the emission benefits from the physical molecules. Such a book-and-claim approach would enable a common market for trading of certificates, and enable consumers to contribute to decarbonisation without being physically connected to a source of renewable or low-carbon gas. It should be emphasised that a book-and-claim system should avoid creating loopholes and the possibilities for double counting.

2.8 In the current system, only electricity suppliers are required to certify to consumers the share of energy from renewable sources by guarantees of origin. Do you think that this obligation shall be extended to suppliers of renewable fuels (such as biogas, biomethane or renewable hydrogen) as well, and possibly of “low carbon” fuels?

- Yes, for renewable fuels
- Yes, for renewable fuels and low carbon fuels**
- No

2.9 Do you think the cooperation mechanisms set out in RED II should be extended to cover renewable hydrogen regardless of its end use, so that Member States can support renewable hydrogen projects in other Member States and in third countries while counting the energy produced as their own?

- Yes
- No**

Please explain your reply

Comment question 2.9

IOGP supports a technology neutral approach to decarbonisation and believes that measures to incentivise specific technologies, such as electrolyser capacity outside the EU, should be carefully assessed. In particular it would be counter-productive where renewable energy produced in 3rd countries is diverted from domestic electricity production and used for hydrogen export to EU and leads to higher emitting alternative electricity production.

Alternatives to the cooperation mechanism set out in REDII should be considered, such as an EU-wide market for certificates that enable renewable and low-carbon energy produced in one Member State to be used in other Member States.

The EU's 2050 decarbonisation scenarios and other international reports suggest that renewables, energy efficiency and electrification will have to deliver most of the required emission reductions. However, carbon capture technologies will potentially be needed to create the negative emissions required to reach climate neutrality and address emissions from hard-to-abate sectors.

2.10 Carbon-capture and storage/usage in the EU should play a prominent role in...

	Strongly agree	Agree	Disagree	Strongly disagree
Decarbonising the power sector	X			
Decarbonising energy intensive industries (e.g. chemicals, cement, steel)	X			
Production of hydrogen (i.e. based on natural gas with CCS)	X			
Creating negative emission / carbon removal, e.g. via CCS applied to bioenergy[1] (BECCS) or direct air capture and storage	X			
Providing captured CO2 as a feedstock for other industries	X			

2.11 In addition to how CCS and CCU are treated in other EU legislation, do you think REDII should be revised to encourage the uptake of CCS and CCU?

Yes

No

3. Technical questions on specific sectors

This section covers specific sectors covered by REDII and asks for your opinion on whether they should be changed/ strengthened in order to improve the chances of achieving the EU's 2030 climate ambitions.

3.1 RENEWABLES IN ELECTRICITY

Mobilising private investment for the development in renewables is essential in the context of increased ambition. In REDII, there are new several provisions aiming to promote the use of renewable power purchase agreements (contract under which a natural or legal person agrees to purchase renewable electricity directly from an electricity producer "PPAs").

3.1.1 How would you rank the appropriateness of the following measures in tackling the remaining barriers for the uptake of renewable electricity that matches the expected growth in demand for end- use sectors?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Further foster regional cooperation in the deployment of renewable electricity				
Further streamline permitting procedures				
Further support the uptake of private renewable PPAs				
Establish minimum mandatory green public procurement (GPP) criteria and targets in relation to renewable electricity				
Further support the uptake of energy communities and self-consumption				

Other? Please specify

3.1.2 How do you think regional cooperation in deploying renewables electricity could be further promoted?

3.1.3 How appropriate do you think the following measure would be in promoting the use of private renewable power purchase agreements?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Financial solutions/instruments				
Removing administrative/legal barriers				
Creating green labels for buyers of renewables-based products				
None, market participants are already actively engaging				

Other? Please specify

Public authorities, thanks to their purchasing power and often high electricity consumption, can be real drivers for change. RED II does not contain any provisions on renewable energy obligations in public procurement.

3.1.4 Should there be specific obligations for public authorities to contribute to achieving a high level of renewable energy (multiple answers possible)?

- Yes, all public authorities should be obliged to buy green energy
- Yes, but only larger public authorities should be obliged to buy green energy
- Yes, but only if it does not cost more
- Yes, but only if the green tender is likely to trigger investment in additional green energy generation
- No

Please explain your reply

3.1.5 Do you think modifying REDII would be appropriate in order to further promote offshore renewable energy, following the adoption of the EU Offshore Renewable Strategy?

3.2 RENEWABLES IN HEATING AND COOLING

Under REDII, Member States must endeavour to increase the share of renewable energy in heating and cooling by an indicative 1.3 percentage point (ppt) per year up to 2030. Sources of waste heat and cold can be counted towards the 1.3 ppt up to 40%, and in Member States where waste heat or cold is not used, the yearly increase that the Member States must endeavour to achieve is 1.1 ppt.

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in heating and cooling would constitute around 40% in 2030. This would require an increase of the share of renewable energy in heating and cooling in Member States significantly higher than the yearly increase of 1.3 ppt.

3.2.1 How appropriate do you consider the following options for increasing the uptake of renewable energy in heating and cooling?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Increased energy efficiency	X			
Direct renewable heat use (from sustainable biomass, geothermal, solar thermal...)				
Direct renewable electricity use (in electric heat pumps using ambient energy)				
Use of renewable gases	X			
Use of district heating and cooling networks that can supply in the same system waste heat and renewable heat		X		

Other? Please explain

Comment Question 3.2.1

IOGP supports a technology neutral approach and believe that all options that can reduce GHG emissions – renewable as well as low-carbon fuels – should be considered on equal footing. REDII has served as an important instrument to increase the use of renewable energy. However, expansion of renewable energy is a tool to achieve the decarbonisation target and should not constitute a goal in itself. Integrating renewable and low-carbon solutions in the revised REDII enables all renewable and low-carbon solutions to collectively work towards decarbonisation of the energy system in an effective and cost-efficient manner in all sectors, including heating and cooling.

3.2.2 Should the current indicative target of 1.3 ppt (or 1.1 ppt, if waste heat and cold is not used), annual average increase of renewable energy in heating and cooling set for the period of 2021-2030 in Article 23 become a binding target for Member States?

- Yes
- No

3.2.3 Should the annual average target of 1.3 ppt be increased?

- Yes, to the level leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a lower level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a more ambitious level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- No

Under REDII, neither renewable electricity nor hydrogen and synthetic fuels produced from renewable electricity that is used for heating and cooling can be counted towards the target for heating and cooling, only thermal heating produced from renewable energy sources.

3.2.4 Do you think renewable electricity used for heating and cooling should be counted towards the target for heating and cooling?

- Yes
- No

3.2.5 Do you think that renewable hydrogen and synthetic fuels produced using renewable electricity and used in heating and cooling should be counted towards the target for heating and cooling?

- Yes
- No

The current Article 23 of REDII provides a list of measures that Member States can use to increase the share of renewables in heating and cooling. These are physical incorporation of renewables in energy fuels supplied, direct and indirect mitigation measures (e.g. installation of renewable heating systems), and other policy measures, e.g. fiscal measures and financial incentives.

3.2.6 Do you think the list of measures provided in the Directive that Member States can use to increase the share of renewables in heating and cooling should be expanded or made more detailed?

- Yes
- No

3.2.7 Do you think these measures should be made binding?

- Yes
- Only some of them
- No

3.2.8 How would you rank the appropriateness of the following measures in increasing the share of renewable energy in heating and cooling?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Pricing instruments (taxes, levies and charges)				
EU guidance on support schemes for renewable heating and cooling				
Renewable heating and cooling obligation on energy suppliers				
Stricter product regulation for heating and cooling appliances to ensure that gradually only renewable and climate neutral heating technologies can be placed on the market				
Binding regulations on technical building systems for heating and cooling				
Mandatory heat planning and implementation at the appropriate level (local, municipal, regional) to ensure fulfilling the renewable heating and cooling target				
Strengthen corporate energy purchase agreements for heating and cooling				

Other? Please specify

Comment Question 3.2.8

IOGP supports a technology neutral approach and believe that all options that can reduce GHG emissions – renewable as well as low-carbon fuels – should be considered on equal footing. The uptake of renewable and low-carbon fuels requires different measures in each Member State given the differences in national circumstances, in particular with heating and cooling. Potential EU-wide targets and instruments for heating and cooling would not be cost-effective as national circumstances are so different in each Member State.

3.2.9 Which of the following measures do you think could be appropriate to encourage public authorities to identify renewable heating and cooling potentials and plan their exploitation?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Strengthening the obligation to assess renewable potentials for heating and cooling in the frame of the comprehensive heating and cooling assessments under Article 14 (1) of EED and Article 15(4) of REDII				
A separate assessment obligation of renewable potentials for heating and cooling under RED II				
Mandatory long-term strategies for decarbonising heating and cooling with binding milestones and measures taking into account synergies with other policy areas, such as the comprehensive heating and cooling assessments under Article 14(1) of the EED and the longterm building renovation strategies under Article 2a of the directive amending the EPBD.				

Other? Please specify

3.3 RENEWABLES IN DISTRICT HEATING AND COOLING

Efficient district heating and cooling can play an important role in mainstreaming renewable energy in heating and cooling. Under REDII Member States must endeavour to increase the share of renewable energy in district heating and cooling by an indicative 1 percent point per year up to 2030. Alternatively, Member States must ensure, subject to limited exceptions, that third party suppliers can connect and sell renewable energy and waste heat or cold to district energy networks. The 1 ppt target of annual average increase in renewables can be fulfilled by waste heat and cold in district heating networks (waste heat flexibility).

3.3.1 Should the current indicative target of 1 ppt annual average increase of renewable energy in district heating and cooling set for the period of 2021-2030 become a binding target?

- Yes
 No

3.3.2 Should the level of the current indicative target of 1 ppt annual average increase of renewable energy in district heating and cooling be increased?

- Yes
 No

3.3.3 How would you rank the appropriateness of the following measures in encouraging the use of waste heat and cold by district heating and cooling networks?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Obligation for district heating and cooling network operators to connect waste heat and cold suppliers				
Obligation for industrial and service sector companies (e.g. data centres) producing significant waste heat and cold to make available their waste heat and cold to district heating and cooling companies				
Requirement for the relevant competent authorities to encourage cooperation between industrial and service sector companies				
Requirement for the relevant competent authorities to prepare the necessary plans (heat plans, energy plans, energy infrastructures plans, spatial plans, etc.), policies or regulations enabling the feeding of waste heat and cold into district networks				
Specific target for waste heat and cold use				

Other? Please specify

3.3.4 Do you consider that third party access to district heating networks by renewable heat suppliers should be strengthened?

- Yes
 No

Please explain your reply

3.3.5 Which of the following measures do you think would be appropriate in strengthening the rights of consumers in district heating and cooling networks?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Improve information to consumers on the energy performance and renewable shares of district heating and cooling, including to low-income and vulnerable consumers.				
Increased transparency of heat and cold supply prices to consumers and their components (e.g. energy and, network costs, taxes, levies)				
Strengthen disconnection [1] rules for consumers				
Make it easier for consumers to switch to renewable supplies within a network via either a single buyer model or third party access or guarantees of origin				
Make it possible for consumers to feed renewable heat or waste heat and cold into the network (prosumer rights)				

[1] RED II allows customers to disconnect from those district heating or cooling systems that are not efficient or do not become efficient by 31 December 2025, in order to produce heating or cooling from renewable sources themselves.

Other? Please specify and/or explain your choice of the previous questions.

3.3.6 How appropriate do you think the following measures are in making district heating and cooling systems be better integrated within the overall energy system?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Better coordination with electricity and gas TSOs and DSOs to plan network investment and integrate flexibility to maximise renewable integration				
Removing barriers to renewable thermal energy storage				
Promotion of the use of flexible renewable generation capacities (e.g. heat pumps, cogeneration, power to heat)				
Better integration of district heating and cooling systems in EU, national and local energy infrastructure planning				
Better integration of variable renewable electricity and heat in urban planning				

3.4 RENEWABLE ENERGY IN BUILDINGS

Buildings account for 40% of energy use in the EU, and heating and cooling is responsible for around 50-80% of that energy consumption. Three quarters of heating and cooling in buildings is still supplied from fossil fuels. The EU building stock should be carbon-neutral by 2050. The Renovation Wave initiative aims to address the current low renovation rates across the EU and accelerate the transformation of the EU building stock into a highly energy efficient and decarbonised building stock by 2050. Contributing in this perspective, REDII requires Member States to introduce measures in their building regulations and codes to increase the share of energy from renewable sources in the building sector, but does not set any particular target or level for this. On average the percentage use of renewables in buildings is 23.5%.

3.4.1 Do you think that Member States should require a minimum percentage of renewable energy in the energy use of new buildings or buildings subject to major renovation?

- Yes
- Yes, only for new buildings
- Yes, only for buildings subject to major renovation
- No

3.4.2 If yes, what minimum percentage of energy consumed by a building do you think must come from renewable sources?

- 10%
- 20%
- 30%
- 40%
- 50%
- 100%
- Other

3.4.3 How would you rank the following measures in terms of their appropriateness in ensuring that buildings' heating and cooling systems are increasingly based on renewable energy while fossil fuels are gradually phased out?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Set minimum renewable energy levels (see 3.4.1) in REDII and ensure conformity in building regulations and codes				
Simplify permitting and administrative procedures for the integration of renewable energy solutions in buildings				
Set minimum renewable energy shares for heating and cooling in national building stocks				
Set specific renewable energy requirements at district or neighbourhood levels, i.e. nearly zero-energy districts.				
Extend REDII provisions on self consumption, applicable to electricity, to heating and cooling				
Strengthen consumer information and accessibility of measures to deploy renewables in buildings' heating and cooling systems, in particular in low-income or vulnerable households				

Other? Please specify

Comment Question 3.4.3

IOGP supports a technology neutral approach and believe that all options that can reduce GHG emissions – renewable as well as low-carbon fuels – should be considered on equal footing. The uptake of renewable and low-carbon fuels requires different measures in each Member State given the differences in national circumstances, in particular with buildings' heating and cooling systems. Potential EU-wide targets and instruments for buildings' heating and cooling systems would not be cost-effective as national circumstances are so different in each Member State.

Heating systems in building are generally replaced when they break down, usually during winter when it is urgent, leading to suboptimal decisions favouring replacement with the same, generally fossil fuel appliance. A planned replacement of heating systems would enable consumers to make informed choices and prepare the installation of renewable and more efficient heating.

3.4.4 How would you rank the appropriateness of the following measures in improving the replacement of heating systems, in particular to encourage the replacement of fossil fuel appliances by renewable heating systems?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Heating system replacements should be coordinated with and be part of building renovation whenever there is major renovation of a building or at other trigger points in the life-cycle of a building for carrying out energy efficiency renovations[1].				
Building renovation programmes (at national, municipal and district levels) should specifically support the modernisation of heating systems by their replacement with renewable technologies				
Energy Performance Certificates and heating system inspections should indicate recommended dates, steps and possible options for renewable heating systems				
National building renovation strategies should specifically address the transition from fossil fuel to renewable and climate neutral heating with related investment plans				
Fossil fuel heating systems replacement with renewable and other climate neutral ones (like waste heat) should be part of neighbourhood and district approaches to building renovation and urban renewal programmes				
Information campaigns should also target heating system replacement programmes with appropriate advice and information, including regarding financing and public support opportunities and solutions				
Digitalization should give early warnings on the need for repair/maintenance				

[1] A trigger point could be: a transaction (e.g. the sale, rental or lease of a building, its refinancing, or a change in its use) a renovation (e.g. an already planned wider non-energy-related renovation).

Other? Please specify

3.5 RENEWABLE ENERGY USE IN INDUSTRY

Industry is a big energy user being responsible for 25% of the final energy consumption. However currently there are no specific provisions or targets related to the use of renewable energy for the sector. The Commission's Energy System Integration Strategy and Hydrogen Strategy have however identified industry as an economic sector where rapid progress is required to increase the use of renewable energy, be it through direct use of renewable heat, through electrification, or through the use of renewable and low carbon fuels to replace fossil fuels as feedstock and fuel.

3.5.1 Do you think there should be an obligation on industry or certain industrial sectors to use a minimum amount of renewable energy?

- Yes, on industry in general
- Yes, but for specific industries only
- No

3.5.2 How would you rank the appropriateness of the following additional measures to encourage the use of renewable energy in industry?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Creation of renewables-based industrial parks/clusters				
Technical support, including training and skills development, for uptake and integration of renewables in small- and medium-size enterprises				
Specific innovation programmes to develop renewables- and electricity based production processes				

Energy audits required under the Energy Efficiency Directive should cover renewable energy used by the enterprise

Simplified permitting and administrative support for corporate sourcing of renewables, including for on-site and near-site generation as well as corporate renewable power purchase agreements

Contracts for difference for zero-carbon products and services

Other? Please specify

Comment Question 3.5.2

As recognised in the EU Hydrogen Strategy, hydrogen will be key to lowering GHG emissions in some carbon intensive industrial processes, such as in the steel or chemical sectors. While the priority outlined in the Commission's strategy for the EU is to develop renewable hydrogen, the strategy recognises that in the short and medium term other forms of low-carbon hydrogen will be needed. To kick-start hydrogen development, European industry needs clarity and investors need certainty in the transition on i.a. what can be considered as renewable and low-carbon hydrogen. The review of REDII provides an opportunity to create a single legislative instrument that covers both renewable and low-carbon hydrogen. IOGP further recommends to apply a consistent EU-wide methodology to determine the life-cycle GHG emissions for the different production pathways of hydrogen. This would create a common EU-wide system for renewable and low-carbon fuels which could also be used for market-based measures on both supply and demand side to support and stimulate investments.

3.6 RENEWABLE ENERGY IN TRANSPORT

Under REDII, each Member State must set an obligation on fuel suppliers to ensure that renewable energy makes up at least 14%^[1] of the energy used in that Member State in the transport sector.

The achievement of the target is facilitated by **several multipliers on energy content**:

- a multiplier of 4 for renewable electricity consumed in **road transport**
- a multiplier of 1.5 for renewable electricity consumed in **rail transport**
- a multiplier of 1.2 for renewable fuels consumed in **maritime and aviation transport**
- a multiplier of 2 for advanced **biofuels and biogas**

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in transport would constitute around 24% in 2030, calculated according to the methodology described above. Both the aviation and maritime sectors will need to scale up efforts to increase the use of sustainably produced renewable and low-carbon fuels. This will be assessed in greater detail in the context of the ReFuelEU Aviation and FuelEU Maritime initiatives.

[1] Member States have the right to lower their target if they set limitations on food and feed-based biofuels going beyond RED II

3.6.1 Do you think that the level of the renewable target in transport should be increased?

- Yes, but less ambitious than indicated in the 2030 Climate Target Plan
- Yes, as ambitious as indicated in the 2030 Climate Target Plan (24%)
- Yes, but more ambitious than indicated in the 2030 Climate Target Plan (for instance 24% without multipliers)
- No

Please explain your reply

3.6.2 Member States can count renewable electricity, sustainable biofuel and biogas, hydrogen produced from renewable electricity (except if such electricity comes from biomass) and recycled carbon fuels^[1] towards the 14% target in transport. Do you think Member States should also be able to count other low carbon fuels which have fewer emissions than fossil fuels, such as low carbon hydrogen?

- Yes
- No

[1] 'recycled carbon fuels' means liquid and gaseous fuels that are produced from liquid or solid waste streams of non-renewable origin which are not suitable for material recovery in accordance with Article 4 of Directive 2008/98/EC, or from waste processing gas and exhaust gas of non-renewable origin which are produced as an unavoidable and unintentional consequence of the production process in industrial installations.

3.6.3 Do you think that some renewable and low carbon fuels should be specifically promoted in transport, beyond being part of the obligation on fuel suppliers ?

- Yes
- No

3.6.4 If you answered 'yes' to the previous question, which of the following types of renewable and low carbon fuels do you think should be specifically promoted ? (Multiple answers possible)

- Advanced biofuels and other fuels produced from biological wastes and residues
- Renewable hydrogen and renewable synthetic fuels
- Low-carbon hydrogen and low carbon synthetic fuels (including through applying CCS techniques)
- Renewable electricity
- Recycled carbon fuels
- Other

3.6.5 Which types of renewable and low carbon fuels can be best promoted by an obligation on fuel suppliers, based either on energy content or GHG emissions, compared to other instruments?

- Liquid renewable fuels
- Liquid low carbon fuel
- Gaseous renewable fuels such as hydrogen
- Gaseous low carbon fuels such as hydrogen
- Renewable electricity
- Other

3.6.6 How would you rate the appropriateness of the following measures regarding the use of renewable and low carbon fuels in transport?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
The scope of fuels that can be counted should be harmonised to ensure that all fuels that are eligible for counting towards the renewable energy target are supported in all Member States	X			
Member States should have flexibility to design the supply obligation using one of the following approaches: in terms of volume, energetic value or GHG emission intensity.				X
The fuels supply obligation should be based on GHG emissions targets to stimulate the uptake of best performing fuel options on the fuel market	X			
The level of ambition should be fixed at the same level for all Member States to create a level playing field and avoid market fragmentation				

The multiplication factors for different types of renewable energy sources should be abolished to simplify the legislation and to increase the ambition level (limitations and sub targets would remain)

Set out specific measures to promote the use of renewable and low carbon fuels in aviation and maritime transport such as dedicated supply obligations, sub-targets or other incentives.[1]

X

[1] In parallel, the ReFuelEU Aviation and FuelEU Maritime initiatives are assessing legislative options to boost the production and uptake of sustainable fuels in the aviation and maritime sectors.

Other? Please specify

3.6.7 How appropriate do you think the following measures would be in encouraging the use of hydrogen and hydrogen-derived synthetic fuels in transport modes that are difficult to decarbonise?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Include hydrogen and hydrogen-derived synthetic fuels in a dedicated sub-target together with advanced biofuels				
Set an additional dedicated sub-target for hydrogen and hydrogen-derived synthetic fuels				
Allow double counting of the contribution of hydrogen and hydrogen-derived synthetic fuels towards the transport target or the fuel supplier obligation				

Other? Please specify

3.6.8 How would you rank the effectiveness of the following measures in encouraging the use of renewable electricity in the transport sector?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Support the purchase of electric vehicles				X
Support the installation of electric vehicle chargers in households and enterprises				
Set stricter CO2 standards for cars				
Ensure the availability and interoperability of public recharging infrastructure				
Establish a minimum level of renewable electricity as a part of the target for renewable energy in transport				
Giving consumers information on whether they are recharging their electric vehicle with renewable energy				

Other? Please specify

3.7 BIOENERGY SUSTAINABILITY

The Biodiversity Strategy[1] acknowledges that, to mitigate climate and environmental risks created by the increasing use of certain sources for bioenergy, REDII already includes strengthened sustainability criteria (to be implemented on the ground starting 1 July 2021 at the latest) and promotes the shift to advanced biofuels. According to the Strategy, the use of whole trees and food and feed crops for energy production should be minimised. Moreover, the Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system[2] contains concrete measures for a sustainable use of biomass. The Commission is continuously assessing the EU and global biomass supply and demand and related sustainability. An ongoing study on the use of forest biomass for energy production is expected to be finalised and published by the end of 2020. This will inform the Commission's policy-making, including the review and revision, where necessary, of the level of ambition of the Renewable Energy Directive.

In order for Member States to count energy from forest biomass towards their renewable energy targets, Article 29 paragraphs 6-7 of REDII requires that the country of origin has laws in place to ensure the legality of harvesting and forest

regeneration. If that cannot be shown, sustainability compliance must be shown at the level of the biomass sourcing area (e.g. through forest management certification or equivalent tools)

[1] COM/2020/380 final
[2] COM/2020/381 final

3.7.1 Do you think the sustainability criteria for the production of bioenergy from forest biomass in RED II should be modified? (only one reply possible)

- Yes, they should be made stricter
 No, they should not be modified

Please explain your reply

3.7.2 The obligation to fulfil sustainability criteria for biomass and biogas in heat and power applies to bioenergy installations of at least 20 MW for solid biomass and 2 MW for biogas. Should these thresholds be lowered to include smaller installations?

- Yes
 No

3.7.3 Do you think that there should be limits on the type of feedstock to be used for bioenergy production under REDII?

- Yes, it should only be possible to use feedstock listed in Part A) of Annex IX of REDII[1] (therefore excluding used cooking oil and animal fats)
 Yes, it should only be possible to use the feedstock listed in Part A) and Part B) of Annex IX of REDII Yes, it should only be possible to use wastes and residues
 Yes, it should only be possible to use feedstock that does not have higher added-value in nonenergy sectors
 Yes, in some other way
 No

3.7.4 Do you think that the minimum GHG emission saving thresholds for biomass in heat and power, currently at 70% for installations starting operation from 2021 and at 80% for installations starting operation from 2026, should be extended and/or made stricter? (multiple answers possible)

- Yes, by extending them to heat and power installations that started operation before January 2021
 Yes, by increasing the threshold for GHG emission savings
 No
 Other

3.7.5 Do you think that the energy efficiency requirements applying to bio electricity-only installations (article 29, paragraph 11) should be made more stringent (multiple answers possible)?

- Yes, they should be extended to plants of less than 50 MW total rated thermal input
 Yes, the energy efficiency requirements should be higher
 No
 Other

Registered Office: City Tower, Level 14, 40 Basinghall Street, London EC2V 5DE, United Kingdom
T +44 (0)20 3763 9700 / reception@iogp.org

Brussels Office: Avenue de Tervuren 188A, B-1150 Brussels, Belgium
T +32 (0)2 790 7762 / reception-europe@iogp.org

Houston Office: 15377 Memorial Drive, Suite 250, Houston, TX 77079, USA
T +1 (713) 261 0411 / reception-americas@iogp.org

www.iogp.org
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