

SURE-Notification of 2024-07-16:

Clarification on the emission factor for methane losses (0,17 gCH₄/MJ)

After publication of the updated scheme principles in January 2024, both REDcert and SURE received several queries from the market regarding the emission factor for methane losses. The published value of 0.17gCH₄/MJ was communicated by the European Commission to the recognized certification schemes as binding prior to publication of the updated scheme principles.

Based on the queries from the market, REDcert and SURE conducted corresponding research and submitted the findings to the European Commission already in March. The research showed that the emission factor specified by the Commission reflects methane emission along value chain of fossil methane, including the production and conditioning at source.

REDcert and SURE have therefore come to the conclusion and informed the Commission that the value is not suitable for correctly taking methane losses into account in the greenhouse gas calculation of biomethane.

The European Commission has now confirmed the results presented by REDcert and SURE and corrected the value significantly downwards.

The following provisions apply with immediate effect with regard to the above-mentioned emission factor for losses of biomethane:

If biomethane is transported via the European gas grid, the economic operator injecting and transporting biomethane into the European gas grid must take gas loss of **0.01 gCH₄/MJ** into account under **e_{td}**.

The passage *“For gas losses, an emission factor of 0.17 gCH₄/MJ biomethane must be applied by the last interface. [...]”* in the chapter on calculating greenhouse gas emissions from processing (e_p) will be adjusted accordingly.

Default values of Implementing Regulation (EU) 2022/996

In accordance with the Technical Guidance for the calculation of GHG emissions, the values listed in Annex IX of the Implementing Regulation (EU) 2022/996 must be used.

Upon request from REDcert and SURE, the European Commission confirmed that the requirement included in the scheme documentation is in accordance with the legislation. The values have been included in the Implementing Regulation to harmonize the calculation of greenhouse gas emissions. Accordingly, alternative values to those listed in Annex IX of Implementing Regulation (EU) 2022/996 cannot be used under any circumstances, even if valid evidence can be provided.

The Implementing Regulation (EU) 2022/996 can be found [here](#).

Calculation of CO₂-equivalence

Currently, there is a discrepancy between the global warming potential (GWP) listed in Directive (EU) 2018/2001 (Annex V and Annex VI) and Implementing Regulation (EU) 2022/996 (Annex IX).

The European Commission has now clarified that in the case of actual equivalence calculation, the GWP in Annex IX of Implementing Regulation (EU) 2022/996 must be used. A table with the values in the Annexes is provided below.

| Greenhouse gas | GWP Annex IX Implementing Regulation (EU) 2022/996 | GWP Annex V+VI Directive (EU) 2018/2001 |
|-----------------------|---|--|
| CO ₂ | 1 | 1 |
| CH ₄ | 28 | 25 |
| N ₂ O | 265 | 298 |

Information on sustainability characteristics for cultivated biomass from the 2024 harvest/NUTS-2 values

In 2023, the European Commission announced that the NUTS-2 values, which had been developed and recognized under the RED I, were no longer valid and called on member states to submit new NUTS-2 values for recognition. Germany already submitted new NUTS-2 values to the European Commission in the spring of this year. Other member states have also already submitted new values or will do so shortly. The formal review and recognition process by the Commission will take further time, which means that the new values cannot be expected to be officially recognized during the 2024 harvest, which has already begun.

In coordination with the associations representing the area of biomass gathering and in accordance with the announcements already made here, it is recommended that the following information on sustainability characteristics is included on delivery documents, provided that no actual GHG emissions are available for the cultivation of the biomass (which cannot generally be expected):

| | |
|--------------------------------|---|
| Identifier of the certificate: | SURE-EU/xx-xxx/Zxxxxxxxxx |
| Type of biomass: | [Type of biomass], sustainable |
| GHG-emissions: | disaggregated default value according to RED II / Directive (EU) 2018/2001* |
| NUTS-2 code: | DExy (or the code for the respective member state) |
| Country of cultivation: | [Country] |

Once the new NUTS-2 values are officially recognized, the relevant NUTS-2 value can later be used instead of the disaggregated default value by using the existing NUTS-2 area code. We believe that this approach ensures the greatest possible room for manoeuvre.

*Please note that a suitable disaggregated default value is not available in RED II for every value chain or every type of biomass. In this case, only the option “individually calculated value” remains.

Thank you for your attention!

Your SURE Team