

## Energy Traders Europe response on amendments to the Dutch Energy Transport Decree

Energy Traders Europe appreciates the opportunity to submit our comments to the consulted amendments to the Energy Transport Decree for 2025, with a view to implementing the recast Renewable Energy Directive (RED III) in the Netherlands by 01 January 2026.

We welcome the intention to align with the sectoral targets of the recast Directive, yet we note that the proposed approach to biomethane steers away from the broader principles set out for the internal EU market. Below we point to some key aspects that we believe need to be addressed to enable achieving the decarbonization targets also via cross-border trade.

### Key messages

1. Biomethane needs to be treated at par with hydrogen and biodiesel as an eligible renewable fuel under the Dutch quota scheme and the forthcoming emissions reduction scheme
2. Eligibility of imports of all renewable fuels, both via pipelines and LNG terminals, needs to be ensured in the Netherlands through universal use of proof of sustainability certificates, as envisaged under EU law

### Detailed comments

Cross-border transactions in all renewable and low-carbon gases, no matter their production pathway, will help achieve decarbonisation. **For this reason, we call on the Dutch authorities to align with the overall compliance certification criteria as envisaged**

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**under the RED and the Hydrogen and Gas Market Decarbonisation Package.**  
Specifically, we observe that:

- Whilst hydrogen and biodiesel consumed in the shipping sector are entitled to claims of renewable fuel units for energy delivered to the Dutch transport market (HBEs), this is not the case for biomethane;
- Whilst guarantees of origin (GoOs) are no longer the de facto certification instrument for hydrogen, they are still required for eligibility of biomethane towards the Dutch fuel quota schemes, contrary to what the RED III foresees for compliance trades in the regulated market;
- Whilst imported hydrogen can be counted towards the Dutch mobility sector, transport demand in biomethane is to exclusively be covered through domestic production.

To ensure equal treatment of biomethane, as well as to leverage the potential of existing LNG infrastructure for the delivery of bio-LNG<sup>1</sup>, **the Dutch authorities need to ensure eligibility of biomethane injected into the interconnected European gas system, regardless of where it is produced, towards both the HBE scheme, as well as towards the forthcoming Emissie Reductie Eenheden (EREs) system of GHG emission reduction units for different transport-related sectors.** This will require:

- Recognition of proof of sustainability (PoS) certificates as the primary certification instrument for biomethane injected into or imported through the Dutch gas grid<sup>2</sup>;

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<sup>1</sup> The Energy Traders Europe presentation on bio-LNG held in front of the EU Commission during the workshop of the Prime Movers Group on Guarantees of Origin can be accessed [here](#) (pgs. 14-25)

<sup>2</sup> We welcome the alignment of the Decree with the RFNBO Delegated Acts in terms of sustainable certification of Dutch renewable hydrogen production, as well as for the eligibility of imports of renewable hydrogen.

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- Aggregation of GoO data into the PoS, if the former has been issued at production level for biomethane, will ensure proper sustainability certification, traceability and accounting of biomethane consumed in the Netherlands, in line with EU legislation;
- Swift connection of the Netherlands to the Union database, covering the EU-wide interconnected gas network, which will facilitate the use of PoS for both imported and exported volumes;
- Ensuring that the Dutch LNG terminals are recognised and treated as part of the interconnected EU gas network, which will underpin trade in biomethane and bio-LNG.

## Contact

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