CONSULTATION RESPONSE

Implementing RED III: Ensuring a Harmonised and Open Approach to Renewable Gas in the Netherlands

Brussels, 16 October 2025 - *Energy Traders Europe* welcomes the opportunity to provide input on the ongoing public consultation on the proposed amendments to the Energy Transport Regulation in the context of the implementation of the revised Renewable Energy Directive (REDIII). We are committed to advancing the objectives of RED III and to working with Member States towards a harmonised, timely, and consistent implementation across the EU. Please see below some key messages on the proposed amendments followed by more detailed reasoning.

Key messages

1. We strongly emphasise that **the Netherlands must allow biomethane imported via the interconnected infrastructure**, as well as any certified volumes imported from a third country, to be eligible towards the Fuel Transition Obligation in the same way that the Netherlands allows the eligibility of imported liquid biofuels.
2. Similarly, we ask that **the Netherlands allows bioLNG bunkers supplied to shipping to be eligible** towards the current and future obligations in the same way that the Netherlands allows eligibility of liquid biofuel bunkers.
3. The Netherlands should also **allow bio-liquefaction using existing LNG terminals based on the accepted EU principle of mass balance**, as this allows existing infrastructure to help contribute to the energy transition at lower financial and environmental costs.

Detailed comments

We support the government's effort to implement the RED III (EU/2023/2413) in the transport sector by 1 January 2026. Based on the RED III transport obligations, the Netherlands needs to **increase its supply of biomethane** to meet the targets, which would be done both through domestic production and import.

While we welcome this ambition, we warn that meeting such ambition at affordable costs would be impossible without opening up the national market to **import via the "interconnected infrastructure"**[1].

1. **Any biomethane imported using the interconnected European grid should be recognised as eligible towards the fuel obligations outlined in the Energy Transport Regulation**. Biomethane constitutes an obvious low-carbon, technologically mature substitute for natural gas, contributing to both emission reduction and energy security. On the one hand, imported biomethane would allow for the Netherlands to meet its targets **in the most cost-efficient manner**; on the other hand, the Dutch biomethane and agriculture industry would highly benefit from exports opportunities stemming from the removal of barriers to cross-border trade in Europe and the creation of an integrated market.
2. With respect to **certification**, we keep stressing that the use of Guarantees of Origin (GOs) must not be allowed for certifying the compliance of biomethane with RED III sustainability and GHG reduction criteria outlined in Directive EU/2023/2413 Art. 29(2) and 29(7-10). Therefore, in order to ensure compliance with EU rules set out in the same Directive, we invite the Dutch authorities to:
    - Remove the role of GOs in registering grid biomethane and instead use the Proofs of Sustainability bundled with relevant gas shipping evidence (i.e., a supply contract) consistent with mass balance principles.
    - Alternatively, add GOs to the information on the Proof of Sustainability in the Union Database, to clarify the hierarchy between Proof of Sustainability and Guarantee of Origins in the context of proving conformity with sustainability criteria.
3. **Bio-liquefaction at existing LNG terminals in the Netherlands like the Gate terminal at the Port of Rotterdam using the accepted EU principle of mass balance should be permitted**. This is a legitimate and sustainable way to liquefy biomethane that is recognised by both the EU commission and voluntary schemes and has already been successfully implemented in other LNG terminals, particularly Zeebrugge in Belgium. It is also an efficient way to utilise existing infrastructure to contribute towards

[1] As currently defined under European Commission Implementing Regulation (EU) 996/2022, Art. 2.18.

the energy transition. Bio-liquefaction has already been performed at Gate for export to other EU countries. Use of existing terminals will aid the delivery of bioLNG to the Dutch transport market, currently constrained by a lack of small-scale liquefaction capacity.

4. **BioLNG bunkering should be allowed under the existing RED II implementation and the future RED III implementation**. LNG is the future shipping engine of choice, with the order book being dominated by LNG vessels. As such the Port of Rotterdam is poised to become the LNG bunkering hub of the world. It would be a missed opportunity if the Netherlands did not allow bioLNG to contribute.

To conclude, as explained in our position paper "Unlocking the full potential of bioLNG: mass balance liquefaction must remain a viable pathway"[2], we remind that the EU framework set out in Implementing Regulation (EU) 2022/996 recognises **two equally valid regulatory pathways are available for supplying bioLNG**. The first is physical liquefaction, where biomethane is produced and converted into liquid form at a liquefaction facility directly connected to the production site or to the grid. The second is mass balance liquefaction (or liquefaction by equivalence), where **gaseous biomethane is injected anywhere in the grid and directly recovered as liquid using the LNG facilities within the interconnected European gas infrastructure**. The integrity of the chain of custody is ensured by the implementation of a certified mass balancing system (according to EC-recognised international voluntary schemes or national certification schemes).

As the ability to rely on both physical and contractual pathways provides great opportunity to develop the sector, enable flexibility in infrastructure use, and support investments in production, we encourage the Dutch authorities to **allow bio-liquefaction using existing LNG terminals based on the accepted EU principle of mass balance**.

Contact

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[2] Energy Traders Europe, *Unlocking the full potential of bioLNG: mass balance liquefaction must remain a viable pathway* (2025).