

## Response to Fluxys LNG Consultation No. 70 on the Introduction of Equivalence Liquefaction

Brussels, 17 October 2025 - *Energy Traders Europe* welcomes the opportunity to provide input on *Fluxys LNG's* **Consultation No. 70 on the extension of biomethane liquefaction services** through equivalence liquefaction. We are committed to advancing the objectives of RED III and to supporting harmonised, timely, and consistent implementation across the EU.

**We would like to commend *Fluxys LNG* for enabling all the biomethane liquefaction pathways recognised under the EU regulatory framework.** As outlined in our position paper "[Unlocking the Full Potential of BioLNG: Mass Balance Liquefaction Must Remain a Viable Pathway](#)", maintaining both physical and contractual liquefaction routes is essential to ensure flexibility, market integration, and investment certainty in renewable gas. We also **support the proposed methodology for calculating GHG emissions from processing**, which follows the consolidated and widely accepted ISCC approach.

On the other hand, we **warn against introducing requirements for economic operators to be certified by the same voluntary scheme as is used by *Fluxys LNG*.** While we agree with the requirement that only certified<sup>1</sup> economic operators can be eligible for *Fluxys LNG's* biomethane liquefaction services, we believe that limiting the options to the certification scheme used by the terminal operator would arbitrarily limit commercial freedom.

Overall, we would like to conclude by expressing our strong support for the direction taken by *Fluxys LNG* and the proposed extension of biomethane liquefaction services through equivalence liquefaction. **We encourage other Member States to adopt a similar approach**, as this proposal represents an important milestone towards the establishment of a biomethane market in Belgium and across Europe, as well as the achievement of RED III targets.

### Contact

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<sup>1</sup> According to an international voluntary scheme or national certification scheme approved by the European Commission.