

Response to MITECO's consultation on the seal of excellence for biomethane

Energy Traders Europe welcome the opportunity to comment on the topic. Our answers to the Questionnaire issued by MITECO are reported below. We remain available to continue the discussion and provide all required information or clarifications.

Brussels, 8 May 2026

Questionnaire

- 1. What specific and measurable criteria should be included in the social dimension of the label? How would compliance with these criteria be verified?**

No comments.

- 2. What specific and measurable criteria should be included in the territorial dimension of the label?**

No comments.

- 3. What specific and measurable criteria should be included in the environmental dimension?**

No comments.

- 4. How should compliance with these criteria be verified, whilst ensuring they are properly applied?**

Accreditation should be available to both new biomethane production projects in Spain and to projects that are already under development or in operation. However, the accreditation of biomethane under the Spanish excellence certification system should not and cannot be extended to biomethane imports.

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This is because this would effectively impose requirements on extraterritorial production, which would conflict with the legislation of the country of origin and the European regulatory framework. This would ultimately impose additional constraints and costs on consumers of renewable gas.

5. **What relative weight should be assigned to each dimension of the label – social, territorial and environmental – in the assessment process, and how should the case of plants that excel in some dimensions but have weaknesses in others be handled?**

No comments.

6. **Which instrument, if any, should set out the label's specifications, and what procedure for obtaining and accrediting the label should be established, ensuring that both comply with the principles of necessity, proportionality, effectiveness, legal certainty, efficiency and transparency? What role can initiatives by public administrations and private entities play, with criteria agreed between the parties under voluntary schemes and with the participation of certification bodies?**

The label should be structured under a scheme that is aligned with existing initiatives, developed on the basis of criteria agreed between public authorities and industry, and voluntary in nature.

It is imperative to reiterate that the label should not be requested for imported biomethane. It is not possible to impose this on extraterritorial production, as this could be interpreted as a barrier to competition. This concern is not merely theoretical: in April 2026, the European Commission opened an infringement procedure against France ([European Commission, April 2026](#)) for the incompatibility of a national biomethane certificate scheme with the free movement of goods within the Internal Market (Articles 34–36 TFEU). Under the French scheme, suppliers were required to either produce biomethane themselves or purchase certificates exclusively from producers located in mainland France, meaning that biomethane certified as sustainable in other EU Member States was

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not recognised for traceability purposes. The Commission acknowledged environmental goals but considered that prioritising domestic production over imports was disproportionate, given that less restrictive alternatives exist, such as counting biomethane at the point of consumption rather than production. Nevertheless, the system should be open to the recognition of equivalent frameworks or labels in third countries, if applicable.

- 7. What mechanisms for monitoring and periodic renewal of the seal would be necessary to ensure that plants maintain standards of excellence throughout their entire lifespan, and not just at the initial stage of obtaining the seal?**

No comments.

- 8. What existing difficulties or barriers does the seal of excellence address?**

No comments.

Contact

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