

Let biomethane producers make the most economical choice: Allow both options to calculate CI-score for co-digestion

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Executive summary

- Current issue: RED III Annex V/VI mandates an averaged GHG value for co-digestion, preventing feedstock-specific carbon-intensity (CI) allocation.
- Impact: This limits transparency, leads to market distortions, and discourages low-CI feedstocks like manure.
- Industry's position: Allow to choose between averaged and feedstock-specific calculation methods, provided they are auditable via mass/energy balance.
- Benefits: Greater market efficiency and growth, enabling biomethane to play a meaningful role in achieving Europe's decarbonisation goals; accurate sectoral GHG reporting; and alignment with RED III principles of neutrality and proportionality.
- Next step: Clarify Annex VI interpretation through a Delegated or Implementing Act and harmonise guidance across registries and voluntary schemes.

1. Introduction

Under the Renewable Energy Directive (RED III), Annex VI requires that biogas or biomethane from co-digestion be assigned a single, averaged greenhouse-gas (GHG) emission value for the entire output. Individual GHG emissions are mandatory to be audited. However, stakeholders across the biomethane industry have identified practical and policy limitations in this one-size-fits-all rule.

The European Biogas Association (EBA), European Renewable Gas Registry (ERGaR) and Eurogas therefore call for a flexible approach that permits biomethane producers to use either:

- a weighted average emissions value, and
- a feedstock-specific allocation method depending on their preference.

Such flexibility can be provided through a clarification of the interpretation of Annex VI(b)(1) or an amendment of the Annex in question with the ongoing revision.

2. Why Flexibility Matters



(a) Technical Feasibility and Auditability

Co-digestion plants already monitor the quantity and biogas yield of each substrate entering the fermenter. These mass and energy balances are routinely verified under sustainability schemes such as ISCC or REDcert. Therefore, it is both technically possible and verifiable to allocate biomethane volumes to particular feedstocks. Comparable allocation systems exist in other sectors such as the liquid biofuel sector already. It is also allowed by Member States and Voluntary Schemes.

Recognising this reality would not add administrative burden but would better reflect the physical processes taking place.

(b) Market Transparency and Efficiency

A mandatory averaged CI value could conceal the true variation between feedstocks. For example, biomethane from manure or sewage sludge typically has a much lower CI than gas produced from food waste or maize silage. If only an averaged value can be used:

- **low-CI feedstocks lose their market value**, making co-digestion plants less competitive in markets where carbon intensity matters (e.g. FuelEU Maritime, ETS zero-rating, or national transport mandates);
- **high-CI feedstocks become diluted**, potentially re-entering undesired uses;
- **sectoral allocation** (e.g. manure-based volumes to transport, food waste-based to heating) becomes impossible.

A flexible approach would **enhance transparency and investment certainty**, allowing the most climate-efficient use of each biomethane batch. It would also help foster a competitive biomethane business case across all Member States by accommodating the particularities of national markets, while maintaining cohesion through a shared European framework.

(c) Alignment with RED III Principles

The RED III promotes **technological neutrality** and **proportionality**. Restricting biomethane producers to one averaging method conflicts with these principles when both options are auditable and compliant with sustainability rules. Maintaining dual methods would ensure proportionality:

- the **averaged method**, for simplicity, could remain a viable option;



- the **feedstock-specific method** could become an alternative, especially where the operator can demonstrate verifiable mass- or energy-balance accounting.

3. Policy Proposal

EBA, ERGaR and Eurogas proposes the following amendment or interpretative guidance for Annex VI:

Biomethane producers can choose themselves between auditable methods to determine GHG emission values for biomethane produced by co-digestion of more than one feedstock for the respective mass-balance period:

- **Aggregated average method:** calculate a weighted average of all feedstocks based on verified input data.
- **Feedstock-specific allocation method:** allocate discrete biomethane quantities to specific feedstock consignments using a verifiable mass- or energy-balance approach. Each batch retains its own CI-score in the Proof of Sustainability (PoS) and may be traded or reported accordingly.
- Both methods remain subject to identical audit and verification requirements.

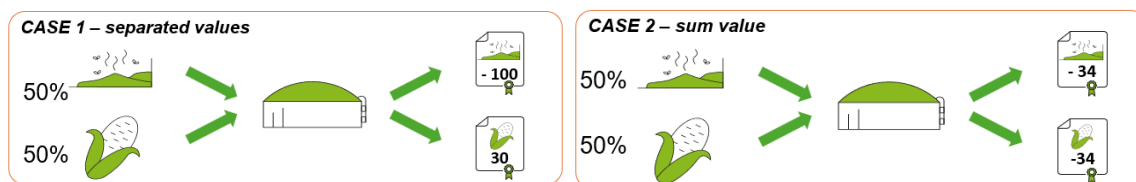
This proposal keeps the system simple for small operators while enabling more granular emission accounting for larger or integrated producers.

In the graph below both options are explained and in a simplified way shown why the feedstock-specific calculation method can be more advantageous.

In the first case, the biomethane producer is using a co-digestion mix consisting of 50% of manure and 50% of maize. However, he is allowed to apply a specific GHG value for the manure-based biomethane, which enables end-users to demonstrate higher GHG reductions. This is particularly valuable for sectors where strong GHG reduction targets or incentives are in place. Other sectors seeking to achieve emissions reductions at lower cost, can also benefit from this flexibility.

In the second case, the GHG reduction attributable to manure use is not fully reflected. As a result, both the GHG reduction potential and commercial value of the biomethane sold would therefore be reduced.

The situation with separated values can result in more value created for the biomethane producers. Consequently, more investments can be made by producers in new projects and new biomethane projects can be more economically viable.



Graph 1: Both options to calculate GHG-emission values

4. Implementation Pathways

To operationalise this flexibility, the Commission could:

1. **Clarify or amend Annex VI(b)(1)** explicitly allowing both options through the ongoing revision process .
2. **Align auditing rules** across voluntary schemes (ISCC, REDcert, etc.) to avoid divergent interpretations and maintain a level playing field.
3. **Provide harmonised registry guidance** (in cooperation with ERGaR and voluntary schemes) to ensure consistent digital implementation in the Union Database (UDB) and national registries.
4. Ensure that the implementation of these rules by Member States does not create barriers to cross-border trade.

With the Union Database being implemented, it is crucial that a good solution which works all over Europe will be implemented.

5. Conclusion

Allowing biomethane producers to choose between averaging and feedstock-specific allocation for co-digestion is a technical reality, an economic necessity, and a policy opportunity. It reflects the physical production of biomethane, supports accurate sectoral GHG accounting, and upholds the principles of neutrality and proportionality in RED III.

EBA, ERGaR and Eurogas stand ready to support the European Commission and Member States in defining practical guidance to enable this flexibility within Annex VI, ensuring a transparent, efficient, and innovation-friendly renewable gas market across Europe, in line with the goals of REPowerEU.