

Question for written answer E-001494/2025
to the Commission
Rule 144
Martin Sonneborn (NI)

Subject: Possible double counting of CO₂ and distortions caused by unclear rules on the use of subsidised options such as biomethane to meet requirements

Regulation (EU) 2023/1805 on the use of renewable and low-carbon fuels in maritime transport aims to cut greenhouse gas emissions produced by maritime transport. The regulation refers to the sustainability and emissions performance criteria in the Renewable Energy Directives (RED II/III). The question of whether or not already subsidised options for meeting those criteria, such as subsidised biomethane and similar energy sources, can be used to meet the targets is left open, however.

This creates a risk that the same CO₂ is counted twice: once in the country of origin – through national support programmes such as feed-in tariffs – and again in calculations relating to the obligations arising from the regulation. In the absence of a clear legal framework, there is a risk that subsidised options are promoted over non-subsidised options, given that subsidised options are often available on the market at lower prices.

Revised Directive 2003/87/EC on the inclusion of shipping in the scheme for greenhouse gas emission allowance trading (EU ETS) expressly and repeatedly calls for double counting to be avoided. It remains unclear whether that requirement is also incorporated into the regulation.

1. Is there a guarantee that greenhouse gas reductions are not counted twice for the purposes of this regulation?
2. Can subsidised options to meet requirements be taken into account, provided that they meet the criteria of the Renewable Energy Directives?
3. Does the Commission intend to issue corresponding guidelines or delegated acts? If so, when are they planned to be published?

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