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Answer given by Mr Jørgensen
on behalf of the European Commission
(4.12.2025)

Pursuant to Article 19(2)(d) of Implementing Regulation (EU) 2022/996¹, gaseous or liquid fuels that are introduced into an interconnected infrastructure can be considered part of a mixture if they belong to the same product group. The definition of a product group in Article 2 (21) of the same Act considers liquefied natural gas (LNG) and biomethane as part of the same product group. Therefore, this allows such fuels to be part of the same mass-balancing system within the integrated infrastructure. The transfer of sustainability attributes between biomethane and LNG would be possible if respective industry conversion factors are applied as well as if all the relevant live-cycle greenhouse gas (GHG) emissions are allocated to the bio-LNG as per a physical liquefaction. If all these pre-conditions are fulfilled such consignments of fuels can be certified as sustainable. Member States are obliged to accept the proof of sustainability declarations that are issued on this basis, if the certification has been performed by certification schemes recognised by the Commission.

The Commission may provide additional guidance for such cases to facilitate the calculation of the total of GHG emissions related to such a liquefaction process. In addition, the new EU traceability tool, the Union database, contains a functionality that would allow for tracing the allocation of GHG emissions and conversion factors in such liquefaction steps.

The relevant Commission services are currently reviewing the implementation of these rules across the Member States, including in the Netherlands, as part of the verification of the transposition of the revised Renewable Energy Directive with the objective to ensure a comprehensive and harmonious implementation of the legal requirements.

¹ OJ L 168, 27.6.2022, p. 1, ELI: http://data.europa.eu/eli/reg_impl/2022/996/oj.