

Feedback for the Platform on Sustainable Finance draft report with recommendations for the revision of the EU Taxonomy

The Danish Biogas Association (Biogas Danmark) acknowledge and appreciates the Platform's efforts to revise and update the Taxonomy to enhance the clarity and usability.

In this regard Biogas Danmark urge the Platform and the Commission not to impose additional uncertainties and administrative burdens by introducing new threshold values or new methods of documentation. Therefore, Biogas Danmark strongly recommends to stick to the criteria and methods outlined in the Renewable Energy Directive, where the conditions for being sustainable is defined. It will make no sense to introduce additional principles of sustainability in the financial sector

This will be in line with the expected coming working program of the Commission to strengthen the competitiveness of the European Union and pave the way for fulfilling the 2030, 2040 and 2050 climate goals.

Here we need a broad range of instruments to make Europe independent of fossil fuels, climate neutrality and sustainable waste handling and food production – sectors where anaerobic digestion in biogas and biomethane plants can deliver sustainable solutions. We do not need to impose restrictions and burdens on the technologies that is classified as sustainable in the relevant legislation in the European Union, which is the renewable energy directive.

In addition, if more strict criteria are imposed on existing production facilities, this will severely hamper their ability to make the necessary re-investments and this will be counterproductive to the objective of the Taxonomy of promoting sustainability.

Biogas Danmark acknowledge the principle of technology neutrality. Biogas Danmark does, however, believe that this is handled best in making the specific regulations and policies technological neutral – such as general CO₂-reduction obligations for the market players – rather than imposing untransparent adjustments to the taxonomy. This will create the optimal level playing field.

Biogas Danmark believe it is important to assess the different technologies in their own right. Biogas and biomethane is produced from waste and residues from industry, household or agriculture. Resources that would have a higher emission to the atmosphere or aquatic environment if they were not digested anaerobically with the recirculation and reuse of the nutrient content as fertilizer.

Biogas Danmark recommends that the taxonomy is broadened to cover biogas and biomethane production for all end uses (i.e. industry, transport, heating, injection into the grid etcetera) and for all sustainable feedstocks according to the renewable energy directive (e.g. agricultural residues, livestock manure, industrial waste and residues, household waste etcetera).

Biogas and especially biomethane plays a key role in stabilizing the energy system making sure there is sustainable electricity produced from biogas or biomethane stored on site or in the gas system on days where there is no wind or no solar power. This should be emphasized in the report. And especially that the anaerobic digestion of organic residues is a crucial element in the circular economy converting organic waste into valuable energy and agricultural fertilizers, thereby creating multiple environmental and economic benefits.

Finally, Biogas Danmark refer to the more detailed feedback from the European Biogas Association.