

Comments on the SBTi Corporate Net-Zero Standard V2

We welcome the opportunity to comment on the second consultation draft of the SBTi Corporate Net-Zero Standard V2 and recognise the ambition to strengthen corporate climate action. From the perspective of the biogas sector, we would however like to raise several concerns related to the treatment of bioenergy, biological carbon flows, and the use of carbon removals.

System-level climate benefits of biogas

The draft standard does not sufficiently recognise the system-wide climate benefits delivered by biogas. Unlike many other energy technologies, biogas contributes to emission reductions not only within the boundaries of the producing company, but also across the broader energy and agricultural system. These benefits include the avoidance of methane emissions from manure and waste management, the substitution of fossil natural gas in industry, heating and transport, and reduced emissions from fertiliser use through application of digestate.

These mitigation effects often materialise outside the immediate operational boundary of the biogas producer, but they are nevertheless real, measurable and highly relevant for achieving economy-wide decarbonisation. A credible net-zero framework should therefore allow for such documented system effects to be reflected more adequately, particularly within scope 3 accounting.

Scope 2 electricity requirements

We note that the draft introduces increasingly detailed and restrictive requirements related to low-emission electricity sourcing. For biogas plants, electricity and heat are often produced on-site as an integrated part of the biological process. In this context, it remains unclear how internally generated biogas-based electricity is treated. Greater flexibility is needed to ensure that biogas facilities are not required to procure additional "green electricity" without delivering additional climate benefits.

Scope 3 value-chain emissions

Biogas production is inherently linked to scope 3 emissions, especially upstream emissions from agriculture, waste and transport. Without clear guidance on how to credit avoided methane emissions and downstream fossil substitution, there is a risk that biogas producers are held accountable for upstream emissions while receiving insufficient recognition for the emission reductions their activity enables elsewhere in the value chain.

Treatment of biogenic CO₂

The draft standard lacks sufficient clarity regarding the treatment of biogenic CO₂. CO₂ originating from biogas production is part of a short biological carbon cycle and is fundamentally different from fossil CO₂.

This is particularly relevant for CO₂ separated during biogas upgrading as well as for the potential deployment of biogenic carbon capture and storage (bio-CCS / BECCS).

If biogenic CO₂ is accounted for in the same manner as fossil CO₂, the resulting emissions profile will not accurately reflect the climate impact of biogas. We therefore encourage SBTi to clearly differentiate biogenic and fossil CO₂, and to recognise that permanent storage of biogenic CO₂ can play a legitimate role in addressing residual emissions at the net-zero stage.

Use of carbon removals for neutralisation

We are concerned that the current wording of the draft standard creates significant uncertainty regarding the eligibility of permanent carbon removals for use in neutralisation claims. In particular, the provisions related to double counting, corresponding adjustments and additionality risk limiting companies' ability to rely on high-integrity permanent removals when addressing residual emissions at the net-zero stage.

For the biogas sector, this issue is especially important. Biogenic CO₂ combined with permanent storage represents a credible and scalable form of durable carbon removal. However, under the current draft, removals that are co-funded with public support or integrated into national climate frameworks risk being excluded from corporate neutralisation claims. This would significantly weaken investment incentives and slow down the deployment of solutions that are widely recognised as essential for counterbalancing hard-to-abate emissions.

We therefore encourage SBTi to ensure that the final standard enables the responsible use of permanent biogenic carbon removals for neutralisation purposes, provided environmental integrity is safeguarded. A net-zero framework should facilitate, rather than constrain, the scaling of high-quality removal solutions as a necessary complement to deep and sustained emission reductions.