



Biomethane is the key to decarbonizing the heavy duty transport sector in Europe and globally



Regulations should promote technology competition and allow for a mix of clean solutions



Emissions reductions should be viewed holistically, accounting for all elements of a technology's life cycle to permanently reduce the global carbon footprint of the transport sector.



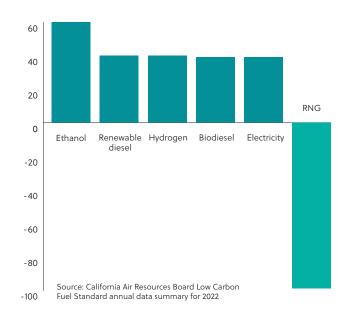
Trucks fueled by biomethane are ready right now

- Road tested, proven, commercially available and scalable.
- ✓ Over 4,100 CNG and 700 LNG stations throughout the EU
- ✓ Unmatched system resiliency & redundancy in times of storms & disasters

Only carbon negative fuel available today

- Carbon negative fuels result in more than 100% reduction of emissions by
 - fully replacing fuel from fossil sources (100% CO2 net-zero) and
 - 2) capturing methane that would have otherwise been released to the atmosphere if not used for fuel production
- Carbon intensity is determined by assessing
 a fuel's total carbon emissions from the entire
 lifecycle of a fuel from production to consumption
 — including feedstock types, raw materials,
 processing, transportation, and final use
- In 2022, the annual average carbon intensity value of the biomethane fuel portfolio was carbon negative at 99gg CO2e/MJ

Renewable fuels average carbon intensity score





Perfectly suited to decarbonize the long-haul, heavy duty transport sector, a traditionally hard to abate sector

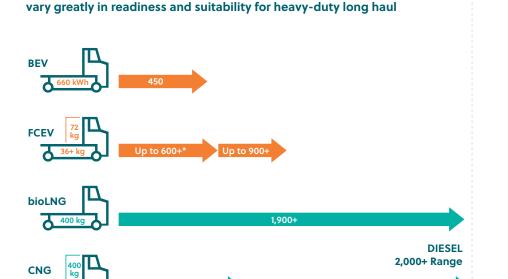
- Battery electric technologies are well suited for certain applications, but are not ideal for the longhaul, heavy duty sector
- Challenges exist with grid demands, infrastructure availability and megawatt charging, particularly during peak hours when wind and solar power may be in short supply

km between fill/charge

Clean energy solutions for today's European transport sector

400

- The power demand for megawatt charging one heavy duty trucks = over 2000 average German homes
- Commercial readiness for hydrogen technologies and infrastructure has potential, but is years away
- Biomethane is best suited for high payload and long-haul applications



800

Promotes Europe's goal of strategic autonomy and energy independence

- ✓ Domestically sourced
- ✓ Aligned with REPowerEU targets
- ✓ Scale-up of renewable biomethane in Europe would enable global deployment and facilitate developments of secondary markets

Note: Assumes directive for truck length increases is adopted for FCEV and CNG trucks

A holistic approach to Heavy-Duty Vehicle CO₂ standards

1,600

2,000

1,200

Recognizing Carbon-Neutral Fuels via Carbon Correction Mechanism

- The Commission's proposal on HDV CO2 standards overlooks the full life-cycle emissions of the vehicles and fails to acknowledge the contribution of carbon-neutral and carbon-negative fuels.
- The Carbon Correction Factor, as a regulatory coefficient, adjusts the measured CO2 emissions from vehicles based on the fuel type, facilitating an accurate and fair assessment.

This method acknowledges the environmental benefits of carbon-neutral and carbon-negative fuels, ensuring a balanced regulatory landscape and healthy competition among different clean technologies.