

Future Support for Low Carbon Heat

The Gas Vehicle Network (GVN) is an established trade body which represents a diverse range of businesses involved in the production of gas-derived fuels and gas-powered vehicles, particularly heavy goods vehicles. Given that air pollution, and related preventable deaths, are at unacceptably high levels, the work of our members is vital in developing the next generation of cleaner transport fuels and vehicles.

The GV Network is one of the seven divisions of the Energy and Utilities Alliance (EUA), a company limited by guarantee and registered in England. Company number: 10461234, VAT number: 254 3805 07, registered address: Camden House, 201 Warwick Road, Kenilworth, Warwickshire, CV8 1TH.

9. What are your views on increasing the minimum percentage of waste feedstocks above 50%, now or in the future? What could be a suitable new threshold? *Please provide evidence to support your response.*

GVN is fully supportive of the proposals to increase the minimum proportion of waste feedstocks under the new Green Gas Support Scheme. We would support a minimum figure of 50% as soon as the scheme begins. Biomethane can offer significant well-to-wheel CO₂ savings compared to road transport fossil fuels but clearly the greater the usage of waste feedstocks, the greater the potential emission savings. We should be ensuring that biomethane produced and subsidised in the UK is making the fullest possible use of available waste feedstocks as opposed to energy crops, particularly in light of the Government's draft waste strategy for England which could significantly boost the amount of organic waste feedstocks available in the coming years.

GVN believes that as the biomethane market grows and develops, the minimum percentage of waste feedstocks should be reviewed and potentially increased should the amount of such feedstocks allow for most producers to increase their proportion above 50%.

10. In light of recent amendments to sustainability criteria in the RED II, do you have any views on whether the UK should look to take into account similar changes for the Green Gas Support Scheme?

In the renewable gas fuels sector, biomethane which provides CO₂ savings in excess of 85% compared to diesel is already readily available and being used by many major businesses. Figures recently compiled by GVN show that 78.2% of all gas transport fuels dispensed in 2019 was renewable biomethane, demonstrating that users of gas vehicles are willing to embrace the environmental benefits that gas fuels can provide. Given that CO₂ saved today is far more valuable than CO₂ saved in decades' time, anything that can be done to encourage the production and usage of low carbon biomethane now should be a priority for the Green Gas Support Scheme.

Development of gas fuels which utilise manure is also underway; under the REDII criteria these fuels would deliver CO₂ savings of 100% making it the first net zero fuel available for larger vehicles, such as HGVs, for which there is no viable electrified drivetrain. GVN is supportive of criteria like this being taken into account for the Green Gas Support Scheme.

17. Do you agree with our proposal to allow biomethane producers to decide how much biomethane they wish to claim Green Gas Support Scheme payments for within a given quarter? **Yes/No.** *Please provide evidence to support your response or provide an alternative proposal for scheme interaction.*

GVN welcomes the proposal to allow biomethane producers to claim from both the Green Gas Support Scheme and Renewable Transport Fuel Certificates in any given quarter. Many in the gas vehicles industry have been calling for this change for some time as the current restrictions have curtailed the amount of biomethane available under the Renewable Transport Fuel Obligation. If biomethane producers are able to access subsidies from a more diverse range of sources, this should encourage higher levels of production and higher levels of biomethane available to drive increasing usage in the gas vehicles sector.