

*eNG Coalition contribution to the Sustainable Transportation Investment Plan (STIP)
Consultation, September 2025.*

The eNG Coalition welcomes the European Commission's initiative to develop a Sustainable Transport Investment Plan (STIP). This plan is not only timely but also strategically critical. It provides a unique opportunity to create the right investment framework for the decarbonization of transport across all modes including maritime, aviation, road, and rail, while strengthening Europe's competitiveness, energy security, and industrial leadership. We strongly support the STIP's stated objectives of de-risking private investment, scaling renewable and low-carbon fuels, and strengthening Europe's strategic autonomy.

In this context, we urge the Commission to explicitly recognize e-methane/e-NG and e-LNG as central pillars of Europe's transport decarbonization strategy. These fuels are technologically ready, infrastructure-compatible, and essential for complementing electrification and renewable hydrogen deployment.

1. Strategic recognition of e-NG and e-LNG

The STIP must explicitly include e-NG and e-LNG in its investment roadmaps for all relevant transport modes, from heavy-duty trucks to shipping and aviation. Unlike other options still under development, e-NG and e-LNG offer an immediate and scalable pathway to reduce emissions. They are fully compatible with existing LNG infrastructure, engines, and logistics chains, minimizing the cost of transition. In addition, synthetic methane serves as an efficient hydrogen carrier. It provides a stable, energy dense molecule that can be stored, shipped, and used globally without the significant challenges posed by hydrogen's low volumetric energy density. This ensures that hydrogen produced in one region can be transported to another, creating real opportunities for international energy partnerships.

We therefore recommend that STIP policy roadmaps, R&D; programmes (Horizon Europe, CEF), and TEN-T infrastructure planning explicitly recognize the role of e-NG/e-LNG as part of the EU's long-term decarbonization vision.

2. Financial de-risking and investment frameworks

A central element of STIP must be the creation of financial de-risking mechanisms. Synthetic fuels such as e-NG and e-LNG currently cost between two and ten times more than fossil alternatives. This cost gap makes it extremely difficult for project developers to reach Final Investment Decision (FID) despite significant interest and a growing project pipeline across Europe.

Dedicated EU-level financial instruments are therefore needed. These could include the expansion of the Hydrogen Bank to cover e-NG, the development of an Industrial Decarbonization Facility under the Innovation Fund, and inclusion of e-NG infrastructure in the Connecting Europe Facility.

In addition, STIP should facilitate the use of long-term contracts, revenue stabilization schemes such as CfDs and innovative mechanisms such as double-sided auctions to give investors' confidence in future returns. Equal treatment of e-NG alongside hydrogen and biofuels in all EU support schemes will be vital. Without this, Europe risks losing industrial projects to other regions where support frameworks are already in place.

3. Certification, tracking and global trade

Transparency and trust are prerequisites for scaling synthetic fuels. The EU Union Database (UDB), created under RED III, must be extended to cover all transport sectors, including maritime and aviation, and must include RFNBOs and low carbon fuels like e-NG. This is essential to ensure certification, traceability, and avoidance of double counting. Certification systems must recognize mass balance approaches, liquefaction equivalence, and third country verification schemes that meet EU sustainability criteria. This will enable Europe to integrate international supply chains while safeguarding environmental integrity. The STIP should also prioritize bilateral energy partnerships with third countries to secure imports of e-NG, while ensuring that such imports are fully integrated into EU certification frameworks. This will not only expand Europe's supply base but also enhance global credibility for e-NG as a climate solution.

4. Demand creation and industrial uptake

Demand creation is as critical as supply side measures. Without clear signals, investors and

shipowners will hesitate to commit to renewable and low-carbon fuels. STIP should therefore establish dedicated renewable gaseous fuel targets for hard to abate sectors, including shipping and aviation. These targets should be implemented via blending mandates, sub-targets under FuelEU Maritime and ReFuelEU Aviation, or through carbon intensity-based procurement rules. Public private alliances should also be encouraged under the STIP framework. Initiatives like Green Corridors and Clean Energy Marine Hubs show that cooperation across ports, shipowners, energy producers, and governments can rapidly accelerate deployment. The same model should be expanded to heavy duty trucking and aviation hubs. Early demand support will give confidence to first movers, foster industrial-scale production, and reduce costs over time. It will also position Europe as a global leader in synthetic fuel markets, with e-NG at the core of this transition.

5. Alignment with IMO rules

To maximise global competitiveness and avoid fragmentation, STIP must be fully aligned with IMO's Net Zero Framework and fuel standards. EU accounting, certification, and tracking rules must be interoperable with IMO methodologies, including life cycle GHG accounting. The Union Database should be extended to cover maritime fuels in a way that ensures mutual recognition with IMO tracking systems. This will ensure a level playing field for EU shipowners and fuel producers in international markets.

Conclusion

The Sustainable Transport Investment Plan is a timely and strategic initiative that can unlock investment, accelerate decarbonization, and strengthen Europe's industrial leadership. To succeed, STIP must adopt a technology neutral approach and fully integrate e-NG and e-LNG as scalable, certifiable, and tradeable fuels. By doing so, the EU can deliver on its binding decarbonization targets (ReFuelEU Aviation, FuelEU Maritime), leverage existing LNG infrastructure for rapid deployment, strengthen its strategic autonomy, and secure Europe's role in the global sustainable fuels market. The eNG Coalition stands ready to contribute technically and strategically to the development and implementation of STIP, ensuring that renewable and low carbon gases play their rightful role in Europe's sustainable transport future.
