

September 10, 2026

Fluxys' Market Consultation 75 – Extension of Biomethane Liquefaction Services to RFNBO Methane Liquefaction

e-NG Coalition Response

The e-NG Coalition welcomes the launch of Market Consultation 75 and thanks Fluxys LNG for the opportunity to provide comments.

The e-NG Coalition is a global alliance of companies across the RFNBO methane (e-NG) value chain, including project developers, technology providers, renewable energy producers, energy utilities, equipment manufacturers and end-users. The Coalition works to promote RFNBO methane, support the development of global markets and certification frameworks, and foster collaboration among stakeholders to accelerate the deployment of RFNBO methane and RFNBO LNG as part of the energy transition.

The Coalition strongly supports the proposed extension of the existing biomethane liquefaction framework to RFNBO methane. Creating a single Renewable Methane Liquefaction Service covering both biomethane and RFNBO methane, at unchanged tariffs, is a significant and practical step towards the commercialization of RFNBO methane and RFNBO LNG in Europe and directly serves growing demand from maritime and heavy-duty road transport. Recognition of liquefaction as a certified conversion step for RFNBO methane at a regulated terminal has been a long-standing ask of our members, and we commend Fluxys LNG for acting ahead of most European terminal operators.

Our comments below are offered in a constructive spirit. They fall into three groups:

- Strong support for the proposal as drafted;
- Two substantive points where we believe the framework can be materially improved (the Equivalence Liquefaction pathway for RFNBO methane, and the scope of certification-scheme compatibility); and
- Requests for clarifications.

1. Support for RFNBO Methane Liquefaction Services

The Coalition welcomes the consolidation of the Biomethane Liquefaction Services into a single Renewable Methane Liquefaction Service covering both biomethane and RFNBO methane, and notes positively that:

- **Existing tariff levels are maintained** for both the Recondenser Liquefaction Service (1.78 €/MWh) and the Equivalence Liquefaction Service (0.84 €/MWh), with the tariff-cap treatment preserved;
- **The Recondenser Liquefaction Service is available to RFNBO methane from the outset**, providing an immediately usable physical conversion route; and
- **The definitional architecture is coherent**, with “Renewable Methane” introduced as an umbrella term for biomethane and RFNBO methane.

Recognition of RFNBO methane within the Zeebrugge LNG Terminal framework sends an important signal to project developers, suppliers, off-takers and investors that RFNBO LNG infrastructure pathways are becoming operational in Europe. Given Zeebrugge's role as a bunkering hub, this is particularly significant for the maritime sector.

2. Default value and timely implementation for Equivalence Liquefaction for RFNBO methane

Under the proposal, Equivalence Liquefaction for RFNBO methane becomes available only once (i) the relevant default value for RFNBO methane liquefaction is published by the Certification Scheme, and (ii) Fluxys LNG is certified for that route. Until then, RFNBO methane can access only the Recondenser Liquefaction Service. This is currently addressed in **footnote 4 to AC 3.10.3.1** only, with no indicative timeline.

The practical consequence is a structural asymmetry between the two renewable methane pathways within what is now presented as a single service:

- **Cost.** The Recondenser route is priced at 1.78 €/MWh against 0.84 €/MWh for Equivalence, almost double the Equivalence tariff. For an interim period of unknown duration, RFNBO methane therefore bears a materially higher terminal cost than biomethane for an equivalent conversion outcome.

- **Volume.** Recondenser Liquefaction Service availability is capped by the physical Recondenser Quantity and the crediting rules of the Certification Scheme, and is subject to pro-rata reduction in the event of a structural shortfall (AC 3.10.2.2.1). Equivalence Liquefaction is not constrained in the same way. Confining RFNBO methane to the Recondenser route therefore also constrains the volumes that can realistically be converted.

We recognize that publication of the default value lies with the Certification Scheme rather than with Fluxys LNG. We nonetheless ask Fluxys LNG to:

- **Actively engage with the relevant Certification Scheme(s)** to support timely publication of a representative default value for RFNBO methane liquefaction, and to report on that engagement through the usual customer channels;
- **Commit** to notifying the market promptly once the default value is published and recertification is complete; and
- **Move the substance of footnote 4 into the body of AC 3.10.3.1**, so that the availability condition and the process for lifting it are set out in the operative text rather than in a footnote.

On the substance of the default value itself, the Coalition's standing position is that the Emission From Processing attributed to liquefaction should reflect **only the climate impact of the renewable methane supply chain** and the energy actually associated with the conversion step, not wider terminal operations. A conservative or unrepresentative default value would consume headroom against the 70% greenhouse gas saving threshold applicable to RFNBOs and could render otherwise compliant volumes unusable. We would welcome Fluxys LNG's support for this position in its dialogue with certification bodies.

3. Scope of certification-scheme compatibility (AC 3.10.1)

AC 3.10.1 provides that a Shipper must be certified under the Certification Scheme with which the Terminal Operator is compliant, *“or under another EU recognized voluntary scheme which is compatible with Biomethane and Bio-LNG”* with that scheme. This

eligibility wording does not appear to have been extended to RFNBO methane and RFNBO LNG.

Read literally, a Shipper certified under a different EU recognized voluntary scheme for RFNBO methane would have no equivalent route to eligibility, even where that scheme is fully compatible. Given that the RFNBO certification landscape is still consolidating and that several schemes are at different stages of recognition for RFNBO methane, we consider this a material barrier rather than a drafting nicety. We propose that the compatibility route be extended expressly to RFNBO methane and RFNBO LNG (see Annex).

Relatedly, footnote 3 describes the elements that compatibility must address by reference to biomethane concepts of feedstock report rules and accepted greenhouse gas calculation methodologies. For RFNBO methane, compatibility must also address the criteria specific to renewable fuels of non-biological origin, particularly the requirements of Delegated Regulation (EU) 2023/1184 (additionality, and temporal and geographical correlation) and the greenhouse gas methodology under Delegated Regulation (EU) 2023/1185. We suggest that the footnote be extended accordingly.

4. Preservation of RFNBO attributes and downstream traceability

We support a single Renewable Methane Liquefaction Service and do not consider that biomethane and RFNBO methane require separate service architectures. We would, however, welcome clarification on how RFNBO-specific attributes are preserved through the conversion step, given that the two pathways now share one service and one physical mass-balance system.

In particular, we invite Fluxys LNG to confirm:

- **Separation of pathways in mass balancing.** That Certificates of Biomethane and Certificates of RFNBO Methane remain distinct within the terminal's mass balance and are not fungible with one another, so that a Certificate of RFNBO LNG can only ever be issued against an input Certificate of RFNBO Methane.
- **Carry-through of compliance data.** That the sustainability, greenhouse gas and RFNBO compliance information carried on the input certificate, including the data

evidencing compliance with the RFNBO Delegated Regulations, is fully preserved on the resulting Certificate of RFNBO LNG.

- **Downstream usability.** That Certificates of RFNBO LNG issued by Fluxys LNG are intended to be usable by downstream participants for compliance purposes, including under FuelEU Maritime and the emerging IMO framework, and how certificate issuance is expected to interact with bunker delivery documentation for vessels loading at Zeebrugge.
- **Allocation between pathways.** How available Recondenser Liquefaction Service will be allocated where biomethane and RFNBO methane demand together exceed the available Recondenser Quantity. Under a merged service, the two pathways now compete for the same constrained pool; transparency on available quantities and on the operation of the pro-rata reduction would help Shippers plan. We would welcome confirmation that no pathway is structurally disadvantaged in allocation.

5. The Commodity Transfer Point equivalence route

The Coalition welcomes the possibility for a Shipper to include, in its Equivalence Liquefaction Request, quantities of LNG transferred to another Terminal User at the Commodity Transfer Point (AC 3.10.3.3). This flexibility is commercially valuable, particularly for maritime fuel supply and bunker delivery arrangements where the party holding the certificates and the party physically loading are frequently different.

We would welcome further clarification on how this mechanism operates in practice, specifically:

- The interaction between the CTP equivalence route and mass-balance implementation within the terminal;
- How the anti-double-counting condition that the relevant quantities are not subject to an Equivalence or Recondenser Liquefaction Service offered to another Terminal User is verified and evidenced in practice;
- The relationship between the physical transfer at the CTP and the transfer of certificates, and which party is treated as holding the chain of custody at each step; and

- Whether the quarterly submission and conversion cycle (submission by the 20th calendar day and conversion by the 30th calendar day after quarter end) is expected to remain appropriate as RFNBO volumes grow, or whether more frequent cycles could be envisaged in due course.

Greater transparency on these points, ideally through a short explanatory note or worked example alongside the Access Code, would provide useful certainty to market participants and support wider uptake of the service.

6. International interoperability

Finally, the Coalition notes that RFNBO LNG produced or certified in Europe is increasingly traded into markets applying their own criteria, including Japan, Korea and the United States, alongside international maritime frameworks. Divergence between these regimes adds cost and uncertainty to every cross-border molecule.

We encourage Fluxys LNG, in developing this service and in its engagement with certification bodies, to support interoperability and mutual recognition between EU RFNBO rules and comparable third-country and international frameworks. The Coalition would be glad to contribute to that work.

Conclusion

The e-NG Coalition supports the proposed extension of liquefaction services to RFNBO methane and encourages its adoption. It is a meaningful step forward for the European RFNBO LNG market and reflects well on Fluxys LNG's leadership in this area.

Our priority requests are that Fluxys LNG provide clear market communication on the availability of Equivalence Liquefaction for RFNBO methane, and that the certification-scheme compatibility route in AC 3.10.1 be extended expressly to RFNBO methane and RFNBO LNG. We would welcome the opportunity to discuss any of the above with Fluxys LNG, and remain at your disposal.