

24th June 2026

**Commissioner Dan Jørgensen**  
**Directorate-General for Energy (DG ENER)**  
**European Commission**  
**Rue Demot 24-28**  
**1040 Brussels**  
**Belgium**

Dear Commissioner Jørgensen

## **RED Annex V, Annex VI and Implementing Regulation (EU) 2022/996**

SEA-LNG is a multi-stakeholder coalition working to accelerate the decarbonisation of maritime transport through the development and deployment of scalable methane pathways, including biomethane, e-methane and other renewable methane solutions.

Europe has a genuine opportunity to become a global leader in biomethane, e-methane and renewable methane pathways. Through initiatives such as RED III, the Sustainable Transport Investment Plan and the Maritime Industrial Strategy, the European Union has established an ambitious framework to strengthen competitiveness, energy security and industrial resilience while advancing decarbonisation.

We were particularly encouraged by your consistent recognition of the role biomethane can play in strengthening Europe's energy security, industrial competitiveness and strategic resilience, reflected in your recent comments at the launch of the Biomethane Mechanism. The EU's ambition to scale biomethane production to 35 bcm by 2030 represents a significant opportunity to support the development of competitive, integrated and innovative European markets for biomethane, e-methane and other renewable methane pathways.

As Europe moves from ambition to delivery, industry is already responding to the policy signals being sent by the European Union. European shipowners account for a significant share of global low- and zero-carbon fuel vessel orders, yet Europe currently represents only a relatively small proportion of projected global low- and zero-carbon fuel production capacity. This highlights the importance of implementation frameworks that create long-term confidence for industry.

The decisions taken in the coming months will influence investment, market development, fuel availability and industrial competitiveness for many years to come.

Before final decisions are taken on the implementation of RED III and related measures affecting renewable fuel deployment and market development, we would encourage a comprehensive consultation process. Given the significance, complexity and far-reaching

implications of the issues under consideration, we hope any consultation period will be sufficiently long to allow genuine, broad and constructive stakeholder participation.

This is particularly important given the wide range of sectors, value-chain participants and stakeholders affected, including renewable fuel producers, infrastructure operators, transport users, investors, certification bodies and technology providers. Should consultation take place during the summer period, we hope this will be taken into account when considering both timing and duration, in order to support broad and effective stakeholder participation. Such a process would also help provide industry with the clarity, predictability and confidence needed to support long-term investment and market development.

In the spirit of constructive dialogue, we have attached a short annex setting out a number of questions which we hope may help inform the discussion.

We would welcome the opportunity to contribute to this process and look forward to continued dialogue with you and your Cabinet. We would also welcome the opportunity for a meeting with you or your team to exchange views on how implementation can best support Europe's objectives on competitiveness, energy security, industrial leadership and decarbonisation.

Yours sincerely,



Steve Esau  
COO SEA-LNG

## ANNEX: QUESTIONS FOR DISCUSSION

### 1. Consultation and Stakeholder Engagement

How does the Commission intend to ensure sufficient time for meaningful stakeholder consultation on forthcoming implementation measures, taking into account both their complexity and the need for broad and effective stakeholder participation, particularly if consultation takes place during the summer period?

### 2. Competitiveness, Simplification and Better Regulation

How will proposed implementation measures support the Commission's objectives on competitiveness, simplification and better regulation, including commitments to reduce administrative burdens for businesses and SMEs?

### 3. Sustainable Transport Investment Plan and Market Integration

The Sustainable Transport Investment Plan highlights the importance of investment certainty, market scale and the mobilisation of private capital to accelerate Europe's clean transport transition. How does the proposed approach support these objectives, including the development of functioning, integrated European markets for biomethane, e-methane and other renewable methane delivery pathways, and the removal of barriers that could limit market integration and growth?

### 4. Biomethane, E-Methane and Market Development

How will the proposed approach support the EU's objective of scaling biomethane production to 35 bcm by 2030 while accelerating the development, integration and scale-up of European markets for biomethane, e-methane and other renewable methane pathways?

### 5. Fuel Availability, Competitiveness and Maritime Decarbonisation

How will implementation measures help ensure sufficient renewable fuel availability to support maritime decarbonisation, competitiveness and the objectives of FuelEU Maritime and the Maritime Industrial Strategy?

### 6. Enabling Scalable and Integrated Renewable Methane Markets

How will the Commission ensure that implementation frameworks support the development of scalable and integrated renewable methane markets, including liquefaction by equivalence and other compliant renewable methane delivery pathways, where robust sustainability, traceability and mass-balance requirements are met, in order to maximise fuel availability, infrastructure utilisation and market efficiency?



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## 7. Delivering Policy Objectives Through Implementation

How will the Commission ensure that implementation measures remain aligned with the wider objectives established through RED III, the Maritime Industrial Strategy, the Sustainable Transport Investment Plan and related initiatives, ensuring that implementation supports the outcomes policymakers have set?