

ACT

Biotickets for Road Transport

Hit your compliance obligations
with confidence and control



Index.

01. The Impact of RED III on Road Transport
02. Biotickets as a Compliance Solution
03. Secure Biotickets with ACT



WE
EMPOWER
YOU TO
ACT ON

YOUR
ENVIRONMENTAL
AMBITIONS

We combine deep market expertise with digital simplicity to help your organization achieve environmental goals efficiently and transparently. **no matter how ambitious.**

ACT ON IT.



01.

**The Impact of RED III
on Road Transport**



RED III introduces two exclusive target types for transport

The Renewable Energy Directive (RED III) entered into force in 2024, reaffirming the EU's 2030 renewable energy targets. Under the new directive, several industries now face higher sector-specific targets.

For the **transport sector**, RED III allows Member States to choose which target to enforce: a greenhouse gas (GHG) emissions reduction target or a renewable energy share target.

By 2030, Member States must require fuel suppliers to either:

A.

Reduce the GHG emissions intensity of the fuels they place on the market by **14.5%** (by supplying renewable fuels).

B.

Ensure that **29%** of the total energy supplied through fuels comes from renewable fuels.

Figure 1: Industries for RED III Targets for 2030



Transport



Industry



Heating



Cooling



Buildings



District Energy



Biotickets help obligated fuel suppliers hit both types of sustainability targets

Renewable Energy Share target

$$\text{\% Renewable energy share target} = \frac{\text{Renewable energy delivered to transport sector}}{\text{Total energy delivered to transport sector}}$$

EXAMPLE

$$29\% \text{ target} = \frac{1 \text{ (GJ)}}{10 \text{ GJ}}$$

GHG Emission Intensity Reduction target

$$\text{\% GHG emission intensity reduction} = \frac{\text{Baseline} - \text{Target GHG emission intensity}}{\text{Baseline}}$$

EXAMPLE

$$14.5\% \text{ target} = \frac{94 \text{ gCO}_2\text{e/MJ} - 85 \text{ gCO}_2\text{e/MJ}}{94 \text{ gCO}_2\text{e/MJ}}$$



2030 targets are set. The path isn't.

Member States must create their own renewable fuel mandates to ensure that fuel suppliers on their territory collectively meet the RED III transport 2030 targets.

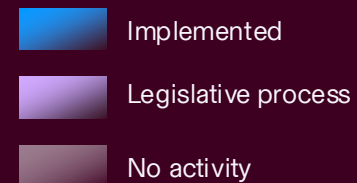
The development status of renewable fuel mandates varies across Member States:

- Many countries are still in the transposition process to adopt RED III into national law
 - Until the process ends, their RED II renewable fuel mandate remains in force.
- Some Member States did not start the transposition process. Their RED II renewable fuel mandate is still in force.
- Some Member States finished the transposition process. Their RED III renewable fuel mandate is in force.



*As of March 5, 2026

Figure 2: Overview of RED III Implementation





Biotickets offer a practical way to respond now

Biotickets are a tradable commodity that can be used to meet the renewable share and GHG emission reduction targets.¹

Fuel suppliers generate them when they blend renewable fuels into their fuel supply, or when vehicle owners charge their electric vehicle with renewable electricity.²

¹ Not all renewable fuel mandates work with biotickets (e.g., Czech Republic & Norway)

² In most cases only fuel suppliers obligated under Member States' renewable fuel mandates can generate biotickets. An exception to this rule is Germany, where also non-obligated fuel suppliers can generate biotickets.





02.

Biotickets as a Compliance Solution



How can I generate biotickets with biomethane or bio-LNG?

Biotickets let obligated fuel suppliers demonstrate compliance with Renewable energy share targets or GHG emission reduction targets Member States' renewable fuel mandates.

They are issued to obligated fuel suppliers when they blend eligible biomethane or bio-LNG into their CNG or LNG supply.

Obligated fuel suppliers can sell any surplus bioticket to other obligated fuel suppliers, who can use them to meet targets **without physical fuel supply.**

Typically, to generate biotickets using **bio-LNG**, only a PoS is required. For **biomethane**, PoS + GO are usually the only documents needed, but this varies per Member State:

Proof of Sustainability (PoS)

- GHG savings(gCO₂/MJ)
- Feedstock classification (Annex IX-A, other)

Guarantee of Origin (GoO)

- Production capacity
- Production details
- Registry & legal information

Obligated fuel suppliers can use biotickets to comply with the targets of the renewable fuel mandate of the Member State they operate in.

Note: Biotickets for each renewable fuel mandate include for example include HBE/ERE (NL), TIRUERT (FR), RTFO (UK), HHE (BE), THG-Quote (DE), CIC (IT).



RED III can incentivize biomethane & bio-LNG by assigning them twice as many biotickets

RED III encourages companies to supply biomethane / bio-LNG produced from Annex IX-A feedstocks (“advanced feedstocks”):

- Under Annex IX-A, a single GJ of biomethane / bio-LNG produced from advanced feedstocks can count as two GJ (“2x multiplier coefficient”). By supplying the GJ needed to generate one bioticket (e.g., in Italy it’s 41.85 GJ per Italian bioticket (CIC)).
- In Member States with a GHG emission reduction target, biomethane and bio-LNG help obligated fuel suppliers generate more biotickets because they are measured in tCO₂eq saved and biomethane and bio-LNG can have very low if not negative GHG emission intensity. This is the real drive point, because double-counting also other renewable fuels get as long as they are made from Annex IX-A feedstocks.

→ Biomethane and bio-LNG make it 2x as easy to comply.

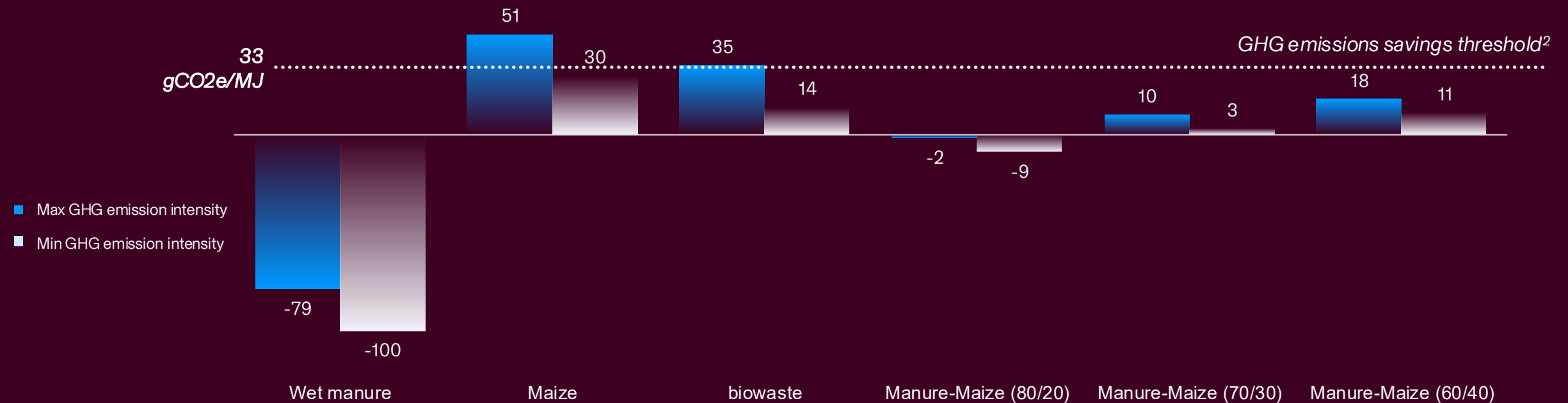
Biomethane & bio-LNG advantages

- ✓ Very low or negative GHG emission intensity, crucial under GHG-based target mandates.
- ✓ Compatible with existing CNG/LNG vehicle and station infrastructure.
- ✓ 4,250+ CNG stations and 769+ LNG stations across EU enable rapid scale-up.
- ✓ Suitable for passenger cars, light duty vehicles, heavy duty vehicles



Advanced feedstocks help you comply more easily with targets

Figure 3: Default GHG emission intensity compared to RED III minimum GHG emission savings requirement¹



Note: This diagram is illustrative

1. Default values for a closed digestate biomethane (RED II Annex V Part D) 2. GHG savings shall be at least 32.9 gCO₂e/MJ or a 65 % reduction for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations starting operation from 1 January 2021 when compared to the 94 gCO₂e/MJ fossil fuel comparator for transport (RED II Article 29)



EXAMPLE: GERMANY

Germany is already using biotickets effectively

The Federal Emissions Control Act (BlmSchG)¹, also known as the THG-Quota, is a German policy tool that aims to reduce the GHG emissions of the transport sector. It creates a market mechanism for German biotickets (THG Quoten).



Fuel suppliers are required to supply renewable fuels that generate THG Quoten

- Fossil diesel and gasoline suppliers (not including LNG / CNG / LPG) suppliers are required to participate
- Every year, GHG emission reduction targets progressively increase, 16% (2027) to 25% (2030) and 59% (2040)
- To hit these targets, fuel suppliers must supply renewable fuels that generate THG Quoten denominated in tCO₂eq
- The THG Quota enforces sub-targets related to advanced biofuels such as biomethane produced from advanced feedstocks and limits on biofuels generated from food and feed crops
- Companies can carry over excess THG Quoten for the following year²



Excess THG Quoten can be sold within the German market

- Excess THG Quoten generated are transferable and tradeable
- Different fuels (biomethane, biodiesel, EVs, hydrogen) generate THG Quoten at different costs, which generates a merit order
- Shifts in supply and demand create price and volume risks for trading participants
- Certain fuels have multiplier coefficients. Supplying EV certificates counts as 3x units towards your THG Quota. Biomethane and bio-LNG produced from advanced feedstocks count as 2x units towards your THG Quota
- A penalty of 600 EUR/tCO₂eq creates a price cap

1. The BlmSchG is the national transposition of the RED II and now RED III

2. Carryover period has been suspended for compliance year 2025 and 2026. Excess quota from 2024 can only be carried over into compliance year 2027



EXAMPLE: GERMANY

Biotickets in practice, continued

EXAMPLE: GERMAN FEDERAL GOVERNMENT TARGETS

Sets the annual THG Quota's GHG emission reduction targets

THG Target Obligation

Obligated parties:

Fossil diesel and gasoline fuel suppliers¹ must meet the annual GHG emission reduction target

Compliance options

Blend renewable fuels to generate THG Quoten for target

Buy THG Quoten in OTC market

Pay penalty

Excess THG Quoten (above target)

Carryover


Trade THG Quoten in OTC market

Renewable Blending Options

Obligated fuel supplier

- Diesel
- Gasoline

Renewable alternative

-  Biomethane/Bio-LNG
- Biodiesel (FAME)
- HVO
- Bioethanol

THG Quoten Certificate Trading

Buy/sell THG Quoten generated from:

-  Biomethane
- Biodiesel
- Bioethanol
- Renewable Fuels of Non-Biological Origin
-  THG Quoten generated from non-obligated parties ²

1. CNG / LNG / LPG suppliers are exempt

2. Non-obligated fuel suppliers (supply only CNG/LNG/LPG) that deliver renewable fuels.



What's driving bioticket prices across markets?

NATIONAL MANDATE

EU Member states with ambitious targets can put higher pressure on companies to deliver renewable fuels.

BIOFUELS SUPPLY

Biodiesel is the most affordable fuel in most transport markets. Its supply will affect the price of biotickets from other sources like biomethane.

PRODUCTION COST OF BIOMETHANE

Biomethane production cost can vary depending on subsidies, feedstock, vintage, and sustainable quality. Some countries may have subsidies to support production.

MULTIPLIER COEFFICIENTS

Some biotickets can be weighted more heavily than others. Right now, biotickets generated from biomethane from advanced feedstock receive a 2x multiplier, which makes it easier to achieve compliance goals.

CHANGES IN POLICY

Bioticket prices can change when new policy information is introduced to the market.

BIOTICKETS MARKET SUPPLY

Supply and demand for biotickets can shift between low-carbon fuel makers and fuel suppliers.



03.

Secure Biotickets with ACT



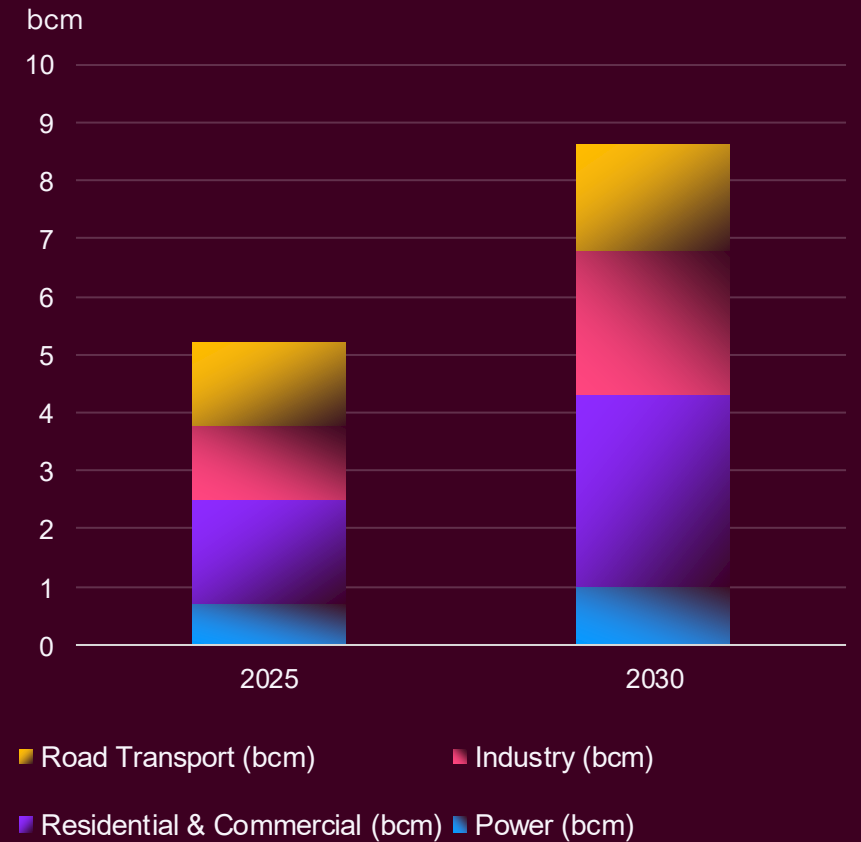
Biomethane is becoming harder to secure

Demand for biomethane is rising fast under RED III.

- Supply is increasing, but not evenly.
- Competition for high-quality biomethane is intensifying across fragmented national markets.
- **Market access, quality control, and cross-border sourcing make the difference.**

Figure 5: Biomethane demand by sector in Europe

Production of biomethane in Europe reached 7 BCM per year in 2026.





We continue to build trust with our clients

A diverse range of companies, from small businesses to the Fortune 500, rely on us to provide comprehensive decarbonization solutions at every stage of their journey to net zero.

Serving clients in over **75 countries**

Chosen by **19** of the top 20 Fortune 500 companies

Products used by over **1,000** of top retail providers globally

Working with more than **90%** of the auto manufacturers in Europe





We provide a practical, proven path to road transport compliance

Our **500+ team** will help you understand your local biomethane market and create a strategy that fits your operational reality.

Dedicated biomethane expertise

Our extensive network for physical flows and mass balancing means we can help you validate quotes and secure the best pricing options.

Experience in global transportation

We work with clients across the entire transportation sector, from maritime to aviation.



EU-wide biomethane sourcing

Our trading desks cover all EU markets, giving exclusive access to certified biomethane that aligns with your sustainability and price preferences.



Feedstock access

Origination experts ensure you can access a portfolio of low-Cl and IX-A feedstocks to maximize GHG reductions.



Seamless structuring and administration

We provide **free advice** on the transfer, cancellation, and audit documentation for country-level bioticket schemes.



Cross-scheme combination

We can combine biotickets with **ETS and other compliance strategies**, including for RED III, ETS2, UK RTFO, THG-Quote, FuelEU Maritime

OUR GLOBAL TEAMS WORK WITH DIFFERENT INDUSTRY GROUPS AS BOARD MEMBERS AND CONSULTATIVE BODIES





This is what compliance looks like with ACT

The Challenge

One of our clients in the shipping industry only wanted bio-LNG that came from a top-quality feedstock. This type of fuel is limited in supply, given the highly competitive biomethane market.

The Solution

To secure enough bio-LNG for scale by evaluating and sourcing the required biomethane via our production network. The acquired premium feedstock biomethane was then converted to fully-traceable bio-LNG through regasification plants in Spain.

The Results



Sourced enough bio-LNG to power their fleet of LNG vessels for 3 months



150.000+ tons of CO₂ saved



Our **500+** global team of client-obsessed experts working in **9 offices**



Have helped **9,000+** customers achieve their environmental goals.



We provide essential products to drive your sustainability success

Discover more of the 200+ products in our portfolio [Visit our website](#)



RENEWABLE ENERGY

Energy Attribute Certificates

- Electricity
- Biomethane / Renewable Natural Gas
- Hydrogen
- Reduced Emission Natural Gas

Energy Purchase Agreements

- Power Purchase Agreements (PPA)
- Gas Purchase Agreements (GPA)



CARBON EMISSIONS

Carbon Credits

- Carbon reduction credits
- Carbon removal credits

Emission Allowances

- Emission Allowances such as EUAs

Climate Project Development



BIOFUELS

Biotickets

Renewable Fuels

- Bio-LNG



ENERGY EFFICIENCY

Energy Efficiency Certificates

Energy Efficiency Project Development



RESPONSIBLE AGRICULTURE

Responsible Sourcing of Agricultural Products

Agricultural Project Development



We aim to create a world where sustainability is no longer just an ambition — where every organization has the tools to take climate action.

This is our ambition.

[Tell us yours.](#)



Next Steps

1.

Add text

2.

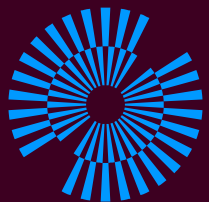
Add text

3.

Add text

4.

Add text



ACT

[Visit our website](#)

[See all our offices](#)

This document/presentation contains proprietary and confidential information of ACT [Commodities (Group) B.V.]. Nothing of this document may be reproduced, duplicated, transmitted, stored in a retrieval system, nor translated into any human or computer language, in any form or by any means, electronic, manual, or otherwise, without the prior written permission of ACT. If you have received this presentation in error, please notify the sender immediately and delete/destroy any and all copies.



04.

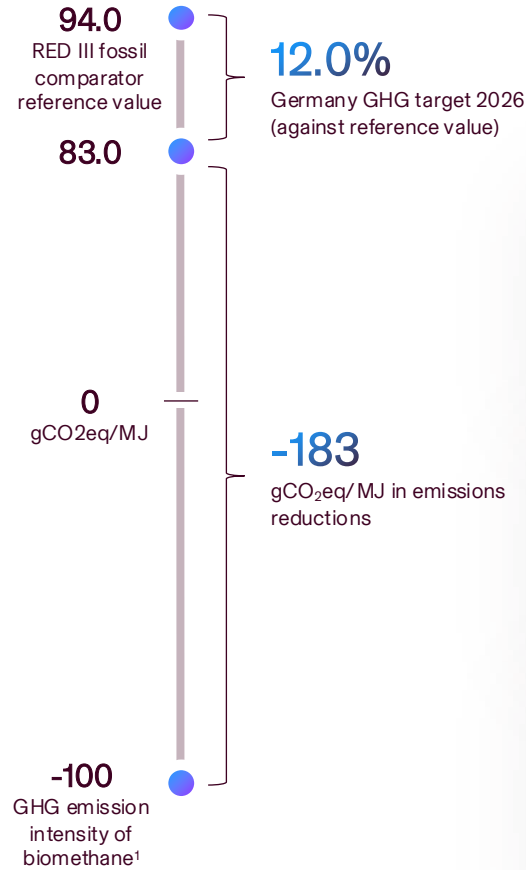
APPENDIX



EXAMPLE: GERMANY

High-quality biomethane can deliver more compliance per euro

To hit the German target, a company may need to reduce emissions by **183 gCO₂eq/MJ**



Using biomethane can help your company hit RED III transport targets with fewer THG Quoten

GHG reduction = **183 gCO₂eq/MJ** or 659 gCO₂eq/kWh

2x counted = 1,318 gCO₂eq/kWh or 1.3 tCO₂eq/MWh

1 tCO₂eq = 1 THG Quoten

1 MWh of Biomethane = 1.3 THG Quoten

If Price of THG Quoten = 200 EUR/tCO₂eq

1 MWh of Biomethane = 263.60 EUR/MWh