



**Workstream:** *Transatlantic Market Connectivity Alliance*

**Group Leader:** Sam Lehr, Executive Vice President of Policy

**Timeframe:** September 2026 - December 2027

## Overview and Purpose

Molecule Group convenes an international, cross-technology, and cross-stakeholder community of practice focused on sustainable fuels, chemicals, and materials (SFCM).

Within that broader platform, the Transatlantic Market Connectivity Alliance (TMCA) builds on several years of engagement with the U.S. Department of Energy (DOE), Office of the United States Trade Representative (USTR), and the European Commission, including the Directorate-General for Energy (DG-ENER), to establish a practical connection between third-country fuel supply chains and the European Union's Union Database for Biofuels (UDB), beginning with the United States.

The TMCA's current focus is the U.S.-EU Alternative Fuels Export Framework (AFEFE): an industry-led, no-frills approach intended to enable U.S.-produced renewable natural gas (RNG) and RNG-derived fuels to satisfy relevant UDB, Renewable Energy Directive (RED), and FuelEU Maritime requirements with minimal U.S. administrative involvement. A functional connection would support credible traceability, guard against double-claiming and fraud, and open commercially meaningful pathways to EU markets.

United States' products remain the primary focus in 2027. As a function of stakeholder interest, the alliance may evaluate how the same model could support connections involving Canada, Brazil, or other third countries.

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## Stakeholders

The alliance will convene fuel producers and exporters, trade associations, certification and tracking experts, shipping and end-user interests, U.S. government agencies, European Commission officials, and other stakeholders needed to establish and use a workable third-country connection.

## 2026 Work Plan

Accordingly, the immediate priority is to initiate a practice-oriented development process, concurrent with the UDB's deployment within the EU, that minimizes the lag between the

start of mandatory UDB use and its ability to track biofuel transactions on U.S. soil. The following deliverables will launch that process:

- **Upon publication of the revised Implementing Regulation 2022/996:** Analyze the final text and prepare the Alliance's response, using the regulation as the primary launching point for refining and advancing the AFEF. Develop a parallel letter to the European Commission.
- **Ongoing:** Continue working with domestic stakeholders to advance the AFEF concept and educate U.S. regulators with a focus on DOE, USTR, and USDA.
- **September 2026:** Rework and finalize the AFEF for an EU regulator audience and begin initial outreach to DG-ENER and Member State representatives.
- **October 2026:** Conduct in-person meetings in conjunction with European Biomethane Week, including with the U.S. Mission to the European Union, DG-ENER, and Member State representatives.

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## Activities and Deliverables

- **Convene the Transatlantic Market Connectivity Alliance**

Molecule Group will facilitate monthly working group meetings to share UDB developments, align priorities and external engagement, refine common materials, and assign follow-up actions. Additional working sessions may be scheduled when an emerging issue requires timely coordination.

- **Advance the AFEF and Support U.S.-EU Engagement**

Molecule Group will maintain the AFEF as the basis for seeking a clear U.S. government position and a pragmatic pathway acceptable to the European Commission. Activities will include coordinating stakeholder input; updating materials as needed; supporting meetings relevant U.S. agencies, DG-ENER, and other Commission services; and organizing follow-up.

The alliance will support technical review of the AFEF and, where authorities are prepared to proceed, implementation or pilot planning. The objective is to rely on existing compliance capabilities including qualified, producer-funded certification while providing the oversight and assurance needed for EU recognition.

- **Represent the Alliance and Assess Additional Third-Country Pathways**

Molecule Group will conduct meetings and follow-up on behalf of the TMCA when full alliance participation is not practical, report back to stakeholders, and maintain continuity across engagements.

#### **Indicative 2027 Milestones**

- **Q1 2027:** Confirm priorities, update the AFEF as needed, and establish the annual engagement plan.
- **Q2-Q4 2027:** Support U.S.-EU engagement, technical review, and follow-up toward an agreed connection pathway. Establish an ongoing cadence of meetings with EU stakeholders, including where possible surrounding key in-person events such as Molecule Forum EU and the Clean Energy Ministerial.
- **Ongoing:** Meet monthly, monitor UDB implementation, represent the TMCA as needed, and evaluate third-country opportunities. In 2027 we will continue to work to expand the TMCA working group to include key parties, potentially from other third countries who are relevant to the success of the AFEF.

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## **Funding**

The TMCA is funded through a sponsorship model. Contributions support monthly convenings, alliance management, drafting, preparation for government and Commission meetings, alliance representation, and follow-up.

#### **Sponsorship Tiers**

- **Leadership Sponsor: \$30,000**  
  
Serve as an anchor stakeholder, participate in all alliance meetings, help shape priorities and engagement strategy, receive public acknowledgment, and hold a seat on the Molecule Group Executive Committee.
- **Workstream Sponsor: \$10,000**  
  
Support the alliance's work, participate in meetings and engagement preparation, and receive acknowledgment on relevant public materials.

**Minimum Sponsorship Goal: \$50,000**

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## Relationship to Broader Molecule Group Activities

The TMCA applies Molecule Group's broader international community of practice to a focused market-access challenge. Its work may inform related activities involving impact accounting, traceability, certification, procurement, trade, and the Molecule Forum, while giving stakeholders ongoing opportunities to propose additional alliance activities.

This workstream is led by **Sam Lehr**, Molecule Group's **Executive Vice President of Policy**.