

Blue Is Not Green: Getting the Low-Carbon Hydrogen Delegated Act Right

Brussels, 22 May 2025

Dear Commissioner Jørgensen,

The Renewable Hydrogen Coalition reaffirms the critical need of prioritising renewable hydrogen in these critical times for Europe.

Europe has rightly established the world-first regulatory framework to scale up renewable hydrogen. Made with renewable electricity, renewable hydrogen is essential for Europe. It is uniquely positioned to decarbonise hard-to-electrify sectors and achieve climate neutrality, while strengthening energy security, and secure leadership in the industries of the future.

But not all hydrogen is made from renewables nor present the same benefits. These need to be clearly defined and distinguished to ensure investors' confidence and enable informed decisions by market players and offtakers. To this end, the draft Low-Carbon Fuels Delegated Act goes in the right direction. However, recent calls for technological neutrality and weaker standards risk undermining these efforts if the environmental footprint of low-carbon hydrogen is not accurately and transparently reported. This is not just a technical regulation. Together with the Delegated Act on Renewable Fuels of Non-Biological Origin (RFNBO), they define the future of hydrogen world-wide, Europe's climate credibility and energy sovereignty.

We call on the European Commission to:

- **Ensure renewable hydrogen remains the centrepiece of Europe's hydrogen strategy.** Any future demand targets and public funding must prioritise renewable hydrogen. In particular, the European Hydrogen Bank must remain dedicated to supporting and deploying renewable hydrogen in line with the legally binding RFNBO targets. Diverting scarce public funding to non-renewable hydrogen would undermine the Bank's impact and Europe's energy and climate goals.
- **Take a more robust approach towards accounting transparently the emissions of fossil hydrogen, based on science.** The climate credentials of renewable hydrogen are undeniable, those of fossil hydrogen still must be proven. While increased default values for methane emissions are positive, more accurately accounting for all GHG emissions, using latest science data¹, is needed for EU and non-EU projects. Being truly low-carbon requires meeting high carbon capture and storage rates compatible with carbon neutrality and sufficiently low upstream methane emissions, transparently monitored and verified by an independent third-party. If not, fossil hydrogen cannot and should not be considered low-carbon.
- **Set strong safeguards to avoid deepening dependency on imported fossil fuels and broader impacts on the energy system.** The production rules for RFNBOs contribute to the EU's renewables deployment, grid decarbonisation, energy security and resilience goals. The Commission must ensure consistency in safeguards for low-carbon hydrogen, notably for fossil hydrogen to avoid increasing demand and price of natural gas and jeopardising our energy security and resilience and prevent delays in investments in cleaner solutions.

Science evidence shows the proposed 6.6g CO₂eq/MJ + 40% penalty (translating into a 2.3% methane leakage) still does not reflect the reality. IEA's Methane Tracker shows average global leakage at 3.2%. MethaneSAT data show rates up to 7.8% in some basins in the U.S. In addition, the latest draft uses the outdated GWP100 = 25 factor, while the more accurate IPCC value of GWP20 82,5 factor and/or the GWP100 29.8 factor should apply to better reflect methane's near-term climate impact.

Europe can lead globally on renewable hydrogen. But this can only happen if the European Commission ensures regulatory integrity, technology clarity, and reaffirms that renewable hydrogen is the preferred solution to guide markets in the right direction.

We urge the Commission to take immediate actions to address persisting obstacles slowing down the ramp-up of the European renewable hydrogen sector, inter alia, slow permitting, infrastructure gaps, lack of public-backed de-risking tools such as guarantees across the value chain, pending national transposition of legally binding RFNBO targets, to lack of demand support and limited public funding. Providing fit-for-purpose implementation tools are crucial to unlock much needed investments and help meet climate and competitiveness goals. With your support, we can deliver your ambition.

Yours sincerely,

François Paquet

A handwritten signature in black ink, appearing to be 'François Paquet', with a stylized flourish extending to the right.

Managing Director
The Renewable Hydrogen Coalition

The Renewable Hydrogen Coalition (RHC) promotes the critical role of renewable hydrogen to deliver the EU's long-term decarbonisation goals. The Coalition is the voice of the renewable hydrogen value chain, from leading renewable companies, innovative start-ups, investors, to frontrunner industrial off-takers, all dedicated to making Europe the global leader in renewable hydrogen solutions.