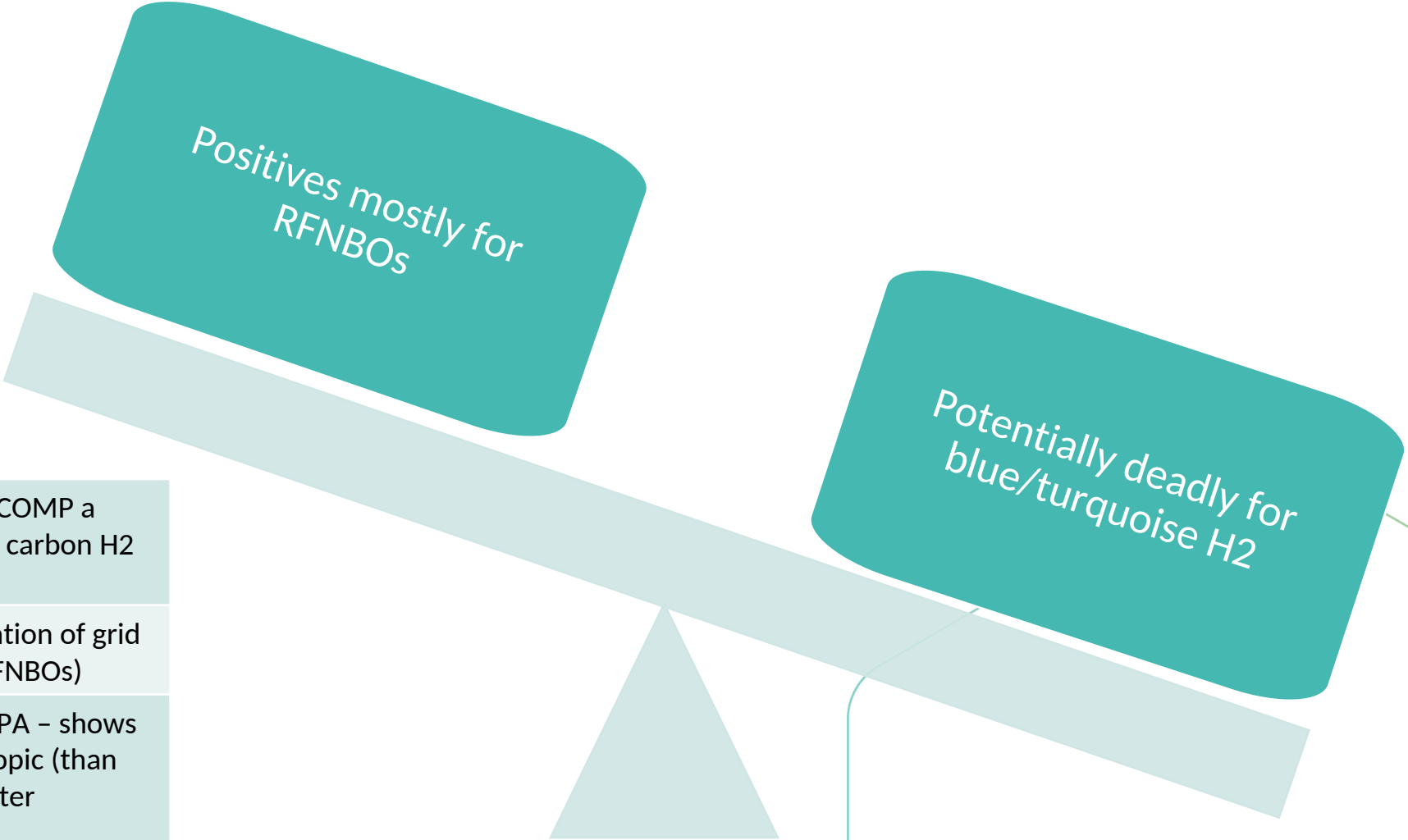


HE view on the draft Delegated Regulation on Low Carbon Hydrogen



Key takeaways from the draft LCH DA



Positives mostly for
RFNBOs

Potentially deadly for
blue/turquoise H2

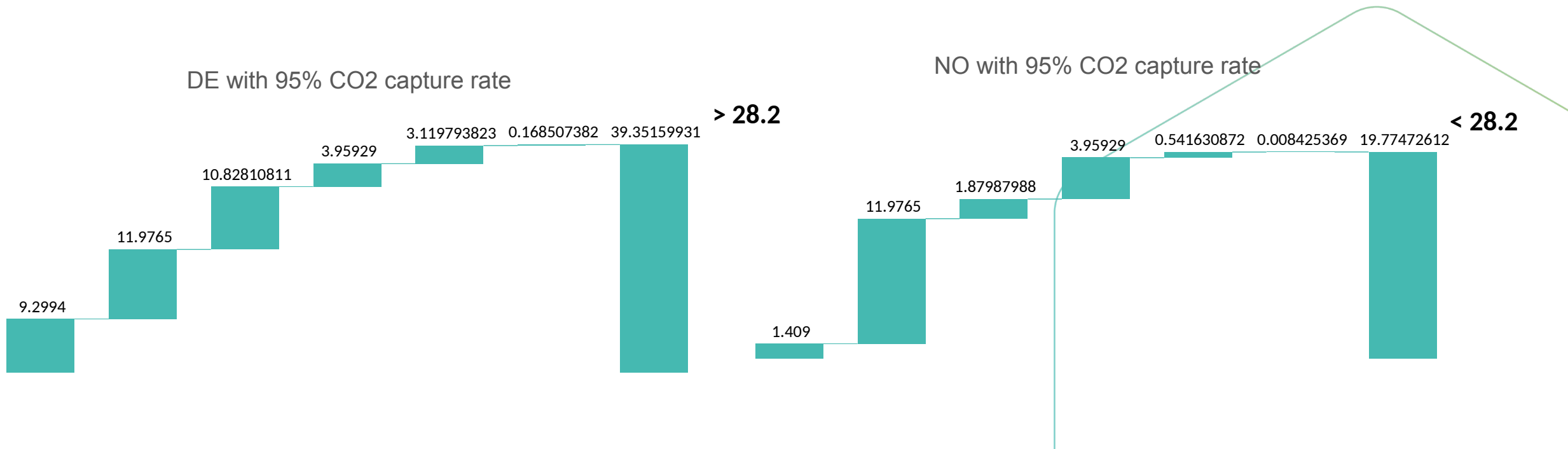
Recital 2 removed (the one giving DG COMP a possibility to add other criteria for low carbon H2 to be eligible for state aid)

Hourly average option for GHG calculation of grid electricity (positive for LCH and also RFNBOs)

2026 Impact Assessment for nuclear PPA – shows EC commitment to act earlier on the topic (than 2028 initially foreseen) - provides greater transparency for the process

Key takeaways from the draft

- CO2 emitted by end of life if co-products needs to be included (negative for pyrolysis)
- Increased natural gas upstream emissions from 10.5 to 15.1 gCO2/MJ
- CO2 (and N2O) upstream emissions for natural gas fixed with no possibility of using project specific values (and fixed at a higher level than previously – 8.4 vs 5.5)
- CO2 from waste incineration only eligible until 2036 (provided it is covered by an effective carbon pricing)



- CO2 emitted by end of life if co-products needs to be included (negative for pyrolysis)
 - **Enlarge the list of products considered to permanently chemically bind CO2 – to include products such as biochar and graphite (in the Commission Delegated Regulation 2024/2620 of 30 July 2024)**
- Increase natural gas upstream emissions from 10.5 to 15.1 gCO2/MJ
- CO2 (and N2O) upstream emissions for natural gas fixed with no possibility of using project specific values (and fixed at a higher level than previously – 8.4 vs 5.5)
 - **Allowing project promoters to certify project-specific values for upstream gas emissions**
 - **Allowing the use of biomethane and natural gas mix as a strategy to lower the average emission intensity**
- CO2 from waste incineration only eligible until 2036 (provided it is covered by an effective carbon pricing)
 - **Conduct an impact assessment regarding the availability of affordable CO2 sources**

Thank You



Avenue Marnix 23
1000, Brussels / Belgium

secretariat@hydrogeneurope.eu
hydrogeneurope.eu

