To
Dr Ursula von der Leyen
President of the European Commission

cc: Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy
Teresa Ribera, Executive Vice-President for Clean, Just and Competitive Transition
Wopke Hoekstra, Commissioner for Climate, Net Zero and Clean Growth
Dan Jørgensen, Commissioner for Energy and Housing

- via E-Mail -

Dear Madam President,

Europe's hydrogen ambitions stand at a critical juncture. While industry, Member States and Parliament have supported the strategic shift towards renewable and low-carbon hydrogen, empirical evidence from major project developers across Europe now shows a widening gap between regulatory design and industrial feasibility.

Several flagship projects with secured financing, advanced permitting and identified off-takers have stalled or been withdrawn because the current RFNBO framework creates economic conditions under which investment decisions cannot responsibly be taken. It is in particular additionality, temporal correlation, and the restrictive definition of green PPAs that have proven decisive cost drivers and risk multipliers at early project stages.

Therefore, to restore credibility, investment reliability and level playing field conditions across the Union, we respectfully urge the Commission to **advance the review of the RFNBO Delegated Acts to the first half of 2026**. Waiting until 2028, or until the long-promised study on the effectiveness of the RFNBO criteria is commissioned, would mean losing several years in which European projects could otherwise reach bankability and establish domestic supply chains.

A targeted and pragmatic revision should focus on:

- Introduce a **more workable approach to renewable electricity sourcing**, including by a deletion of the **additionality** criterion and the option to contract electricity from existing or publicly supported renewable generation.
- **Keep monthly temporal matching available as a long-term compliance route**, so that projects can operate efficiently and achieve viable utilisation rates instead of being forced into hourly alignment.
- **Enable renewable PPAs to be concluded across interconnected bidding zones**, avoiding structural disadvantages for landlocked or border regions.
- **Allow hydrogen production to qualify when it demonstrably supports the power system**, particularly during periods of surplus renewable generation or when low prices indicate high renewable availability.

Europe's strategic objective must remain a competitive, investable hydrogen economy that strengthens industrial resilience and climate ambition simultaneously. An accelerated review of the RFNBO framework is indispensable to achieve that goal.
Additionally, we are demanding an alignment of the rules on sourcing electricity from the electricity grid with the recently adopted Delegated Act on low carbon fuels. Greenhouse gas emission intensities of the bidding zone must be allowed to be measured on an hourly basis, thereby making use of the high penetration of renewable energy sources in peak generation hours already today. This would increase highly increase the number of load hours for electrolysers, decreasing costs of production and per unit of hydrogen output.

Furthermore, we demand changes of the underlying accounting rules stemming from the Renewable Energy Directive (RED) on the allocation of emissions to a production process. Basing the output of a hydrogen production facility on the hourly share of renewables in the electricity system would give more incentives to hydrogen producers, in particular for grid-connected electrolysers, as they would simultaneously produce low carbon and renewable hydrogen.

We remain at your disposal for a structured dialogue and stand ready to contribute constructively to the upcoming revision.

Yours sincerely,

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