Q&A implementation of hydrogen delegated acts

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General questions

1. What evidence would be required to demonstrate that hydrogen qualifies as renewable?

Reply: The RED does not include a definition of renewable hydrogen. Instead, the RED includes a definition of renewable fuels of non-biological origin (RFNBO), which covers hydrogen produced via electrolysis from renewable electricity as well as its derivatives. The term renewable hydrogen is often used as a simplification for hydrogen that qualifies as a RFNBO under the RED [^3]. To count as an RFNBO, hydrogen is required to 1) fulfil the definition of an RFNBO as set out in Article 2(36) of RED, 2) comply with the rules set out in Article 27(6) of the RED for the sourcing of renewable electricity 3) achieve 70% emissions savings and (4) be traced through the supply chain in line with the rules set out in Article 30(1) and (2) RED. In this context the hydrogen delegated acts set out detailed rules for sourcing of renewable electricity that is used for the production of RFNBOs and for determining the GHG emission intensity (GHG methodology)[^4].

2. For what purposes do the rules on renewable hydrogen set out in RED apply?

Reply: The rules have to be met to count renewable hydrogen towards the targets set out in the RED. Complying with the rules is not a prerequisite for importing hydrogen or for placing hydrogen on the EU market but may be a prerequisite for receiving public support.

3. Are the RFNBO delegated act and the GHG methodology interlinked?

Reply: The RFNBO delegated act complements the RED by setting out detailed rules on how fuel producers can source electricity that counts as fully renewable. The RED itself already includes a rule that allows sourcing electricity that counts as partially renewable (average share of renewable electricity in the country in the year n-2). The GHG methodology includes a life-cycle approach to determine the greenhouse gas emission intensity of RFNBOs (and recycled carbon fuels “RCF”). This approach distinguishes between electricity that counts as fully renewable and electricity that counts as partially renewable. In addition, the methodology includes a formula that allows deriving the amount of RFNBOs and RCF that is produced as this is required to derive the emission intensity. The delegated acts are therefore closely interlinked.