

## **Joint letter on RFNBO/H2 Blending in the gas grid**

**To the attention of DG ENER representatives: Ms Ditte Juul Jørgensen, Ms Mechthild Wörsdörfer, Ms Kitti Nyitrai, Ms Edith Hofer, Mr Galin Gentchev, Mr Bernd Kuepker**

We, the undersigned European associations representing gas infrastructure operators (distribution, storage and transmission), renewable gas producers and energy traders would like to thank the European Commission for its continued efforts to provide clarity and support for the implementation of the revised Renewable Energy Directive (Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413). We share the Commission's ambition to accelerate the deployment of renewable fuels of non-biological origin (RFNBOs) and to ensure that Europe remains on track to meet its 2030 and 2050 climate and energy objectives.

Following the Commission's communication of 27 May on the implementation of RFNBO targets in industry and transport, we are seeking further dialogue and clarification on one specific aspect related to the treatment of renewable hydrogen injected into the interconnected gas grid.

### **Context and concern**

The guidance states that allocation of the sustainability characteristics and greenhouse gas (GHG) emission savings of RFNBO hydrogen injected into the gas network is only possible where the hydrogen is physically separated from the gas mixture at the point of consumption. This interpretation, in practice, limits the ability to count blended hydrogen unless the end-user undertakes physical separation. In many cases, the consumption of blended hydrogen without separation is the only economically viable solution. Therefore, a pragmatic approach is needed.

### **Our shared objective and rationale for RFNBO blending**

We fully recognise the need for robust accounting and environmental integrity in tracking RFNBOs and their GHG emission savings. At the same time, we are collectively seeking practical, scalable pathways to gradually integrate renewable hydrogen into the existing infrastructure in line with the goals of REPowerEU and the Hydrogen and Decarbonised Gas Market Package<sup>1</sup>. The interpretation under current framework that only pure hydrogen networks may contribute toward RFNBO targets is not explicitly stipulated in EU legislation. It appears to derive primarily from the absence of provisions governing blended gases rather than from a legal prohibition. Importantly, blending hydrogen under certain thresholds may be permitted without altering the legal classification of the

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<sup>1</sup> H2 blending authorised in Art.21 Gas Regulation: up to 2% in NG flows must be accepted and facilitated at cross-border transmission points

network as “dedicated to natural gas”, as no threshold has been defined beyond which repurposing would apply (see Article 2 of Directive (EU) 2024/1788 and Recital 74 of Regulation (EU) 2024/1789). A clarification of this point would provide valuable regulatory certainty and enable consistent implementation across Member States.

We believe that enabling the counting of RFNBO hydrogen injected into the grid based on certification and existing mass balancing principles-without requiring physical separation at the consumer end-would:

- Facilitate early market ramp-up and infrastructure readiness.
- Encourage investment in hydrogen production and injection projects.
- Put European industry and households at a level playing field with other regions around the world<sup>2</sup>, where blending is already deployed.
- Ensure policy consistency with the approach taken in the energy (e.g. electricity) sector, where guarantees of origin allow renewable energy claims independently of physical electrons tracking.
- Ensure alignment with the revised Monitoring and Reporting Regulation (MRR). The recent amendments to the MRR recognize that RFNBOs fed into the gas grid entitle operators under ETS obligations holding a corresponding supply contract to be exempt from surrendering an equivalent number of Emission Unit Allowances. If the mere act of injecting an RFNBO into the gas grid precluded the assignment of its environmental attributes to the gas grid mix and consequently to the final consumer, as the Commission communication appears to imply, this would determine a serious inconsistency between EU rules.

European distribution system operators (DSOs) and transmission system operators (TSOs) have been conducting extensive studies and pilot projects demonstrating the technical feasibility of hydrogen blending (typically up to 10-20%) as well as the capability to measure hydrogen content at injection and delivery points. These projects<sup>3</sup> confirm that blending hydrogen with natural gas is operationally viable and can be managed with existing or marginally adapted infrastructure.

### **A proposal for dialogue**

We respectfully request the opportunity to engage with the Commission services to explore whether the current guidance could be further clarified or refined so that:

- Certified RFNBO hydrogen volumes injected into the gas grid can be accounted for under RED targets through mass balancing and certificates for their existing GHG emissions value.

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<sup>2</sup> China

<sup>3</sup> [Italgas: Italy's first plant for the production of green hydrogen directly connected to a city distribution network inaugurated in Sardinia - Italgas](#)

- Physical separation at the point of consumption would be required only where this is necessary for technical or process-specific reasons determined by the consumer, rather than as a general eligibility condition.

This approach would preserve environmental integrity, ensure traceability through existing certifications systems and allow European industry the flexibility required to deploy hydrogen solutions at scale.

We believe that a coherent and practical implementation pathway is essential to ensure that Europe's hydrogen economy scales up efficiently without compromising environmental ambition or market integrity.

### **Commitment to collaboration**

Our organisations are committed to supporting the European Commission in developing a robust, transparent and future-proof implementation framework. We stand ready to contribute technical expertise, market data, and insights from ongoing hydrogen blending projects (including those testing up to 20% hydrogen in natural gas networks) to support evidence-based policymaking.

We would welcome the opportunity to arrange a meeting or technical workshop at your convenience to discuss this matter further and work together towards a solution that maintains the Commission's objectives while enabling effective RFNBO deployment.

We thank you for your attention and consideration and remain at your disposal for further engagement.

Yours sincerely,

**CEDEC - European Federation of local energy companies**

**e-Fuel Alliance**

**ERGaR – The European Renewable Gas Registry**

**Eurogas**

**GD4S – Gas Distributors for Sustainability**

**GIE – Gas Infrastructure Europe**

**Marcogaz**

**Ready4H2**

