Europex Response to the Commission's Consultation on the Renewed EU Hydrogen Strategy

Brussels, 23 November 2026

Europex welcomes the opportunity to contribute to the Commission's consultation on the renewed EU Hydrogen Strategy. Please find below our full response.

1. To what extent do you agree with the following statement? "Renewable and low-carbon hydrogen can make an important contribution to Europe's transition to a decarbonised economy by 2050, while also enhancing energy security, autonomy and competitiveness."

- Strongly agree

1.1. Please explain your reply:

Renewable and low-carbon hydrogen can contribute to decarbonisation and energy system integration. Its development should be supported by competitive markets, efficient price signals, and a regulatory framework that facilitates trade across sectors and borders.

2. In your view, what should the updated Hydrogen Strategy address in priority?

1. Other 1: Facilitate competitive hydrogen markets and reduce unnecessary regulatory and administrative burdens
2. Other 2: Enable standardised products, virtual trading points, and market-based balancing.
3. Contribute to energy system integration, energy storage and energy efficiency
4. Prioritise the realisation of EU hydrogen pipeline and storage infrastructure
5. Accelerate the scale-up of hydrogen production
6. Improve the cost-competitiveness of renewable and low carbon hydrogen and derivatives versus fossil-based ones.
7. Accelerate the decarbonisation of hard to directly electrify sectors and processes
8. Strengthen the industrial competitiveness of the EU hydrogen companies and value chain
9. Foster innovation in hydrogen technologies
10. Support circular economy and environmental sustainability

3. From your perspective, which existing measures and instruments have so far been most effective in promoting hydrogen supply and uptake?

- Regulatory framework for market- and infrastructure development
- Criteria for sustainability and greenhouse gas emission performance
- EU level financial support for market uptake
- Simplified permitting procedures
- Other: Transparent wholesale markets, standardised products, and harmonised Guarantees of Origin.

4. In your view, is the Commission's EU Hydrogen Mechanism, an efficient instrument to bring together buyers and sellers on an open and transparent platform?

- No

4.1. Please explain your answer:

Existing market operators already provide trading and matchmaking services. While greater transparency is welcome, public initiatives should complement rather than duplicate private solutions, preserving transparent price formation and exchange-based trading.

5. Please indicate, in your view, which have been the main barriers hindering the production of RFNBOs and low-carbon fuels?

Barrier	Assessment
High electricity prices	To a great extent
Volatile electricity prices	To a small extent
High CAPEX costs	To a great extent
Limited availability of renewable electricity generation	To a small extent
Limited availability of PPAs	To a small extent
Limited access to components or critical raw materials	I do not know
Limited willingness to sign long-term offtake agreements due to high costs of hydrogen	To a great extent
Slow lead times for connecting to the electricity grid	I do not know
High grid connection charges	I do not know
Limited availability of hydrogen transport and storage infrastructure	To a great extent
Complex and/or lengthy permitting procedures	To a great extent
The efficiency of water electrolysers for hydrogen production	I do not know
Policy uncertainty at EU level	To a great extent

Policy uncertainty at national level	To a great extent
Insufficient know-how and skills	I do not know
Development of alternative technologies	Not at all
Other	To a great extent

5.1. Other, please specify:

Restrictive RFNBO additionality and temporal correlation requirements.

5.2. Please explain your reply:

Restrictive RFNBO criteria can increase production costs and limit operational flexibility. We urge for more flexible additionality and temporal correlation rules, allowing producers to optimise electricity sourcing in response to market conditions.

6. Please indicate, in your view, which have been the main barriers hindering the increase of demand for RFNBOs and low-carbon fuels in hard to electrify sectors?

Barrier	Assessment
High costs of RFNBOs	Fully
Limited availability of RFNBOs	To a great extent
High costs for adapting end use processes to hydrogen	To a small extent
Limited availability of hydrogen infrastructure	To a great extent
Complex and/or lengthy permitting procedures	To a small extent
Risk of carbon leakage	I do not know
Policy uncertainty at the EU level	Fully
Policy uncertainty at the national level	To a great extent
Insufficient know-how and skills	I do not know

7. What additional enabling, non-legislative measures at EU level could help stimulate hydrogen production and/or demand in the EU by 2030 and beyond?

- Reinforced support by the Commission to Member States on effective implementation of the EU regulatory framework
- Improve integration of hydrogen in the electricity system and its flexibility needs
- Other: Support harmonised market rules, virtual trading points, and exchange-based balancing.

8. What is the most effective way to allocate financial support to hydrogen producers and/or consumers in the EU?

- Auction-based support schemes primarily based on price (e.g. single-sided and double-sided auctions)

8.1. Please explain your reply:

Competitive auctions can help allocate public support transparently and efficiently. Their design should ensure equal access for eligible participants, avoid favouring incumbents, and minimise distortions to wholesale market prices.

9. What are the main barriers hindering the development of infrastructure projects: pipelines, storages and terminals? [multiple responses possible]

- High costs limiting the uptake of hydrogen demand (i.e. commitments by demand off-takers)
- Limited development of renewable or low-carbon hydrogen production
- Uncertainty about future hydrogen policy landscape
- Limited cross-border coordination (including diverging regulatory regimes across Member States)
- Lack of technical standards
- Lack of harmonised hydrogen quality standards and technical rules for network interoperability.
- Other: Unclear network access, capacity allocation, and balancing arrangements.

10. Which of the following instruments or measures are key to accelerate the development of infrastructure projects?

1. Improved cross-border planning and coordination
2. Harmonised technical standards (e.g., for pipelines, ports, or storage)
3. Improved transparency on supply and demand
4. Prioritisation of permitting for strategic projects
5. Instruments to enable access to debt financing (e.g., bank loans)
6. De-risking instruments
7. Focus support on production and/or uptake of renewable or low-carbon hydrogen

11. Considering the EU's need for access to decarbonised, secure and affordable energy, what should be the priority to develop reliable supply of renewable or low-carbon hydrogen at competitive prices?

1. Domestic production within the EU with significant cross-border trade across Member States
2. Imports to the EU from third countries
3. Domestic production close to demand centres
4. Domestic production at national level with limited cross-border trade across Member States

11.1. Please explain your reply:

Hydrogen supply should be driven by competitiveness and market demand rather than geographical preferences. An integrated European market with efficient cross-border trading and access to a diverse range of imports can support both affordability and supply security.

12. In your view, what should be the main preconditions for imports to ensure security and reliability of supply of hydrogen while preserving sustainability and avoiding the creation of new strategic dependencies?

- Compliance with the EU certification rules to ensure a level playing field
- Diversification of imports routes and suppliers
- Cost-competitiveness

13. In your view, what are the main barriers hindering the investments in production of renewable and low-carbon hydrogen in third countries for export to the EU?

- EU regulatory requirements and uncertainty about compliance
- Limited predictability related to EU long-term off-take commitments
- Insufficient trade frameworks in potential exporting countries

13.1. Please explain your reply:

Uncertainty over EU certification requirements and insufficiently harmonised trade arrangements can discourage investment. Clear, workable rules for imported hydrogen and transparent access to European infrastructure are needed to facilitate cross-border trade.

14. What additional non-legislative measures can facilitate imports from third countries to the EU and diversify potential sources of supply?

Promote mutual recognition of compatible certification schemes, harmonised hydrogen quality standards, and clear rules for imported hydrogen and its environmental attributes. These measures would facilitate cross-border trading while avoiding unnecessary administrative burdens.

About

Europex is a not-for-profit association of European energy exchanges with 36 members. It represents the interests of exchange-based wholesale electricity, gas and environmental markets, focuses on developments of the European regulatory framework for wholesale energy trading and provides a discussion platform at European level.

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EU Transparency Register: 50679663522-75