

From: [BATTA Eszter \(CAB-BRETON\)](#)
To: [REDACTED]; [CANTON Joan \(CAB-BRETON\)](#)
Cc: [REDACTED]; [CAB BRETON ARCHIVES](#)
Subject: RE: EU Taxonomy - Threshold for the manufacture of H2
Date: jeudi 15 avril 2021 22:13:24

Der [REDACTED]

Thank you for drawing our attention to this issue. While the text of the delegated act is largely finalised, your contribution will inform the rest of the debate.

Kind regards

Eszter Batta

From: [REDACTED]@edf.fr>

Sent: Thursday, April 15, 2021 6:06 PM

To: BATTA Eszter (CAB-BRETON) <Eszter.BATTA@ec.europa.eu>; CANTON Joan (CAB-BRETON) <Joan.CANTON@ec.europa.eu>

Cc: [REDACTED]@edf.fr>

Subject: EU Taxonomy - Threshold for the manufacture of H2

Dear Ms. Batta, Mr. Canton,

Following our meeting on March 23rd on hydrogen and the EU Taxonomy and the sending by France Hydrogène of further information and data **on the 3kgCO2eq/kgH2 threshold for the manufacture of hydrogen**, we would like to draw your attention on the final negotiations for the finalisation of the Taxonomy Delegated Act on climate change.

First of all we truly hope that the threshold of **3kgCO2eq/kgH2 will remain for the manufacture of hydrogen in order to enable a faster development of projects and the achievement of the first milestones of the EU hydrogen strategy.**

Secondly, we understand that the version of the delegated act currently being finalised would now include a threshold for hydrogen-based synthetic fuels with a reference to the 2.256kgCO2eq/kgH2 threshold.

We would like to highlight that **hydrogen based synthetic fuels are of various nature and a very complex issue. We would therefore caution against the last minute inclusion of a single emission threshold for Hydrogen based synthetic fuels under the article focusing on hydrogen manufacture.**

Having said that, we would also like to point out that **any threshold for derived synthetic fuels should be higher than the one for the manufacture of hydrogen as the CO2 content usually increases due to further transformation process of the hydrogen when producing synthetic fuels.** Under these conditions, the emission reduction threshold must necessarily be higher than the one used for the production manufacture of hydrogen as such. In this context, the reference to a threshold of 2.256kgCO2eq/kgH2 for hydrogen-based synthetic fuels does not seem to make technical sense and it would lead to difficult problems of interpretation if it were to remain.

We would therefore strongly suggest to maintain the focus on hydrogen manufacture and caution against a hasty extension to synthetic fuels which would require a more detailed analysis and proposal.

Best regards

[REDACTED]

EDF – European affairs

[REDACTED]

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