



To
Ms Ursula von der Leyen
President of the European Commission

Ms Teresa Ribera
Executive Vice-President for Clean, Just and Competitive Transition

Mr Dan Jorgensen
Commissioner for Energy and Housing

Brussels, 1 July 2025

Delegated Act on the methodology for calculating GHG savings from low-carbon fuels – urgent need for revision of the draft

Dear Honourable President von der Leyen,
Dear Honourable Commissioner Jorgensen,

We, as Members of the European Parliament, would like to address you in relation to the Draft Commission Delegated Act supplementing Directive (EU) 2024/1788 of the European Parliament and of the Council by specifying a methodology for assessing greenhouse gas emissions savings from low-carbon fuels.

The draft as it was transmitted to Member States in May 2025 for their consultation fails not only to meet key expectations set by the European Parliament, but risks to undermine the development of a robust low-carbon hydrogen market in Europe — an essential pillar in achieving climate neutrality by 2050 — and thereby risks to undermine industrial competitiveness during the transition. **The current draft Delegated Act contains multiple elements that deviate from these principles as well as the demands of the European Parliament.** Having in mind the current challenging market conditions for the European industry, in particular for our basic materials industries like steel, cement and chemicals, the strong risk of carbon leakage, import pressure in those sectors and referring to recent decisions of European industrial players to not invest in industrial decarbonisation projects due to unfavourable market conditions and unpredictable energy prices in the future, these issues are even more urgent.

First, the Commission must ensure that the GHG methodology for low-carbon fuels allows the use of electricity sourced via Power Purchase Agreements (PPAs) from all zero- or low-emission sources — including nuclear and renewables — to uphold technology neutrality and support investment certainty. PPA-based low-carbon electricity must be recognized as zero or low emission, and conditions like temporal and geographic correlation should not be applied to avoid hindering hydrogen infrastructure development. An earlier consultation in 2026 does not seem appropriate to fulfil this demand.

Second, the Commission must revise the arbitrary increase in default upstream natural gas emissions and additionally allow the use of certified, supplier- or project-specific values (e.g. OGMP 2.0) for all upstream gases, not only for methane emissions. This is essential to avoid unjustified penalties on low-carbon hydrogen, enable fair competition, and support EU hydrogen diplomacy. A surcharge must not apply, as compliance with the Methane Regulation cannot be enforced via this Delegated Act. The suggested regulatory framework should not endanger imports of low-carbon hydrogen and hydrogen carriers from key international partners, undermining EU hydrogen diplomacy and supply diversification efforts. We therefore not only demand the possibility for project-based upstream emissions but also underline the option of having country- or region-specific default values. This would increase the variety of countries exporting to the European Union dramatically and would therefore grant higher investment certainty also for investors in Europe.

Third, we note with concern the lack of a proper grandfathering clause for projects with a Final Investment Decision (FID) taken before August 5, 2028 and would suggest grandfathering under existing reporting schemes such as the Methane Regulation. Regulatory certainty is crucial for long-term industrial investments, and such projects must be protected from retroactive changes. The absence of transitional arrangements could disrupt several flagship low-carbon fuels initiatives currently under development.

We therefore urge the Commission to again revise the Draft Delegated Act, as restrictive and unworkable Delegated Act would jeopardise Europe's industrial resilience, climate targets, and strategic autonomy. We call on the Commission to ensure that the final text reflects economic realities, legal obligations, and the strong policy mandate of the European Parliament.

We thank you for your attention and remain at your disposal.

Yours sincerely,

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