

Open Letter to Participants of the 24 October 2025 High-Level Decision-Making Meeting on the 2nd PCI/PMI List

Dear participants,

We are writing to you ahead of the 24 October 2025 High-Level Decision-Making Meeting on the 2nd list of Projects of Common Interest (PCIs) and Projects of Mutual Interest (PMIs).

We are deeply concerned about the direction taken by the proposed hydrogen-related projects included in this list and the broader hydrogen infrastructure strategy they represent. This meeting is the final moment to decide which energy infrastructure projects will receive the PCI and PMI status, which will allow fast-track permitting approval and access to generous public subsidies.

According to available information, more than 100 hydrogen projects are expected to feature on this list, nearly doubling the number from the previous list, including over 50 large-scale transmission pipeline projects. **The total investment for the proposed hydrogen projects exceeds EUR 80 billion, not including the substantial subsidies that will be required to create the demand for the hydrogen.** This rapid expansion of the PCI and PMI list in the number of hydrogen projects risks sidetracking the electrification of Europe while locking us into costly and unnecessary infrastructure.

Most of these pipelines are likely to carry hydrogen made from fossil fuels, contradicting the EU's own decarbonisation and energy security objectives and delaying the phase-out of gas. Fossil-based hydrogen is no better than direct use of fossil fuels due to fugitive methane emissions, and the EU should not endorse it as it does not aid decarbonisation of the energy system. Over 90% of the proposed hydrogen pipelines are promoted by members of ENTSO-G: Europe's fossil gas transmission lobby. ENTSO-G helps shape the EU's energy infrastructure priorities, a glaring conflict of interest that keeps fossil gas at the heart of Europe's energy planning.

Projects like [H₂Med](#) and EastMed show how old fossil gas pipelines projects are now being rebranded as “hydrogen-ready.” With no credible supply of renewable hydrogen in sight, these pipelines, if ever built, will likely carry fossil-based hydrogen for years, all while receiving public money meant for the energy transition. For specific considerations regarding H2Med, please refer to this [letter](#) signed by more than 80 organizations for the High-Level Decision-Making meeting of the first PCI/PMI list in 2023.

No evidence shows that Europe needs a large-scale hydrogen network. [ACER in 2024 warned](#) that current hydrogen network plans are built on “*aspirations rather than concrete market needs*”, increasing the risk of overinvestment and underused infrastructure that citizens will ultimately pay for. [In its recent opinion](#), **ACER questions the credibility and robustness of the process and reiterates its call for greater transparency in the selection of energy infrastructure projects.** It notes that many of the concerns raised in its 2023 Opinion remain valid, particularly regarding the selection process, the identification of infrastructure needs, and the methodologies used to assess projects. The [European Court of Auditors warned in 2024](#)

that “*The Commission did not undertake robust analyses before setting the EU’s renewable hydrogen production and import targets*” and that “*there is a mismatch between energy security and the use of low-carbon hydrogen, which is produced using fossil fuels with carbon capture methods*”.

Without credible plans for renewable hydrogen production and use, these projects might lock the EU into long-term fossil fuel dependency or create stranded assets - all financed with public money (EU and domestic) and high consumer costs. A [recent analysis of Connecting Europe Facility funding](#) shows that, since the revision of TEN-E regulation and inclusion of hydrogen as an eligible category for the PCI status, among the main beneficiaries of CEF funding are gas transmission system operators and fossil-fuel giants like Shell, Equinor and Eni, while Europe’s electricity grids are in desperate need of funding, amounting to almost EUR 600 billion.

The TEN-E Regulation should grant PCI or PMI status only to projects that rely on renewable hydrogen and that aim to replace the current uses of fossil-based hydrogen or serve hard to decarbonise industries. The PCI and PMI status should only be awarded to projects that follow a clearly defined, realistic, and robust strategy for renewable hydrogen production and end-use. The current presence and influence of the fossil fuel lobby via ENTSO-G in the PCI/PMI decision-making process is preventing this from happening.

We call on the representatives and participants of this high-level committee to exclude all hydrogen projects from the PCI/PMI list except for those right-sized electrolyzers to decarbonize hard-to-abate local industries using energy from additional renewables, and to launch a comprehensive revision of the TEN-E Regulation to assess whether the current regulatory framework is truly aligned with the EU’s climate and energy objectives.

The EU must prioritise direct electrification based on renewables, the most efficient, cost-effective and proven route for decarbonisation. For the few sectors that cannot yet be electrified, local renewable hydrogen production and use can play a role. The EU cannot afford to repeat the mistakes of the past by overinvesting in fossil gas infrastructure, this time under the label of “hydrogen”.

Sincerely,

The undersigned organisations

Food & Water Action Europe

CEE Bankwatch Network

Association Workshop for All Being

Bankwatch Romania Association

Bond Beter Leefmilieu

Campagna Nazionale Per il Clima Fuori dal Fossile

Clean Air Action Group (Hungary)
Coordinamento Ravennate
Corporate Europe Observatory
Debt Observatory in Globalisation (ODG)
Ecologistas en Acción
Emergenzaclimatica.it
Energiaklub Climate Policy Institute (Hungary)
Environmental Association “Za Zemiata” - Friends of the Earth Bulgaria
Estonian Green Movement
Forum Ambientalista
Friends of the Earth Europe
Friends of the Earth Malta
Greenpeace European Unit
Hawkmoth
Les Amis de la Terre France
Linha Vermelha
Movimento No Triv
Movimento NoTAP/SNAM di Brindisi
NGO Green liberty
NOAH - Friends of the Earth Denmark
NSC-Friends of the Earth Hungary (MTVSZ)
Polish Green Network
PowerShift e.V.
Priatelía Zeme-CEPA, Slovakia
Reclaim Finance
Red “Gas No Es Solución”
Rete Emergenza Climatica e Ambientale Emilia Romagna
Rete NoRigass No GNL