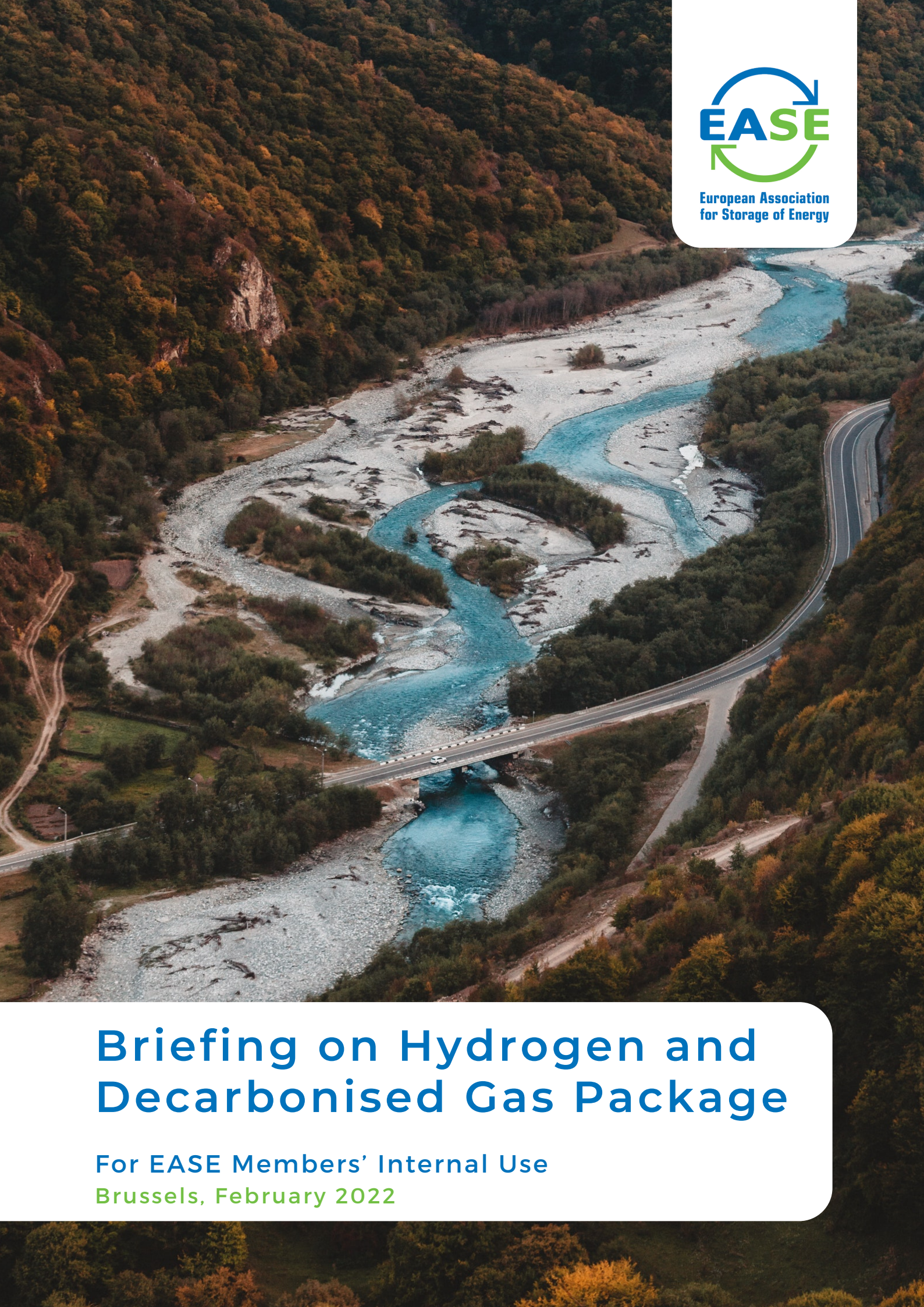

European Association for Storage of Energy

Briefing on Hydrogen and Decarbonised Gas Package

For EASE Members' Internal Use

Brussels, February 2022

Content

Gas Package Proposal Briefing

Preface

This briefing focuses on the Gas Package proposal presented on 15 December, 2021. It is divided in the following chapters:

- Chapter 1 provides an overview of the Gas Package Revision
- Chapter 2 proposes a guide to the Package, highlighting the key provisions per topic
- Chapter 3 investigates specific topics and provisions
- The Annexe presents upcoming Gas Package-related secondary legislation, a brief F.A.Q., and other key policy and legislative actions

Please note that this is a living document: it will be continually edited and updated to better answer EASE members' doubts and concerns.

Chapter 1 – Overview

Introduction

The European Commission proposed Hydrogen and Decarbonised Gas Package revises the third Gas Package, reflecting the political motivation towards energy transition. While a Directive sets out a goal that all EU countries must achieve and lets them devise their own law, a Regulation is a binding legislative act - it must be directly applied in its entirety across the EU.

The Package aims to tackle some perceived failures/ insufficient functioning of the EU internal gas market:

- Absence of regulatory framework for renewable and low-carbon gases at harmonised level in Europe
- Existence of barriers for the deployment of renewable gaseous fuels of non-biological origins ('RFNBOs') like hydrogen
- Hindered cross-border trade due to uneven set of rules across EU Member States.

Further details in the following sections.

The proposed Gas Package revision consists of a Regulation and a Directive on the internal markets for renewable and natural gases and for hydrogen. Please note that this briefing does not focus on the proposal for a Regulation on methane emissions reduction in the energy sector but only on the proposal for a Regulation on the internal markets for renewable and natural gases and for hydrogen (recast) and on the proposal for a Directive on common rules for the internal markets in renewable and natural gases and in hydrogen as they are most relevant for energy storage. When speaking of the Gas Package in this briefing, it is only referring to the latter two legislative acts. The Gas Package proposal published on 15 December 2021 aims to:

- Facilitate the penetration of renewable and low-carbon gases into the energy system
- Enable a shift from natural gas
- Allow renewable and low-carbon gases to play their needed role towards the goal of EU climate neutrality in 2050

This will be achieved by among other things:

- Building the necessary networks, infrastructure and competitive markets for renewable and low-carbon gases
- Promoting a dedicated hydrogen infrastructure, cross-border coordination and interconnector network construction, and elaborate on specific technical rules
- A gas infrastructure in which fossil gas will progressively be replaced by other sources of methane and which is progressively complemented by a hydrogen-based infrastructure
- Introducing a new governance structure, the European Network of Network Operators for Hydrogen ('ENNOH')
- Establishing a joint scenario for electricity, gas and hydrogen which should be the base for national network development plans and be aligned with National Energy and Climate Plans and EU-wide Ten-Year Network Development Plans
- Increasing consumer empowerment and protection and enable consumers to able to choose renewable and low carbon gases over fossil fuels

The Challenges

The proposals for Regulation and Directive address four groups of highly interlinked problems related to renewable and natural gases and to hydrogen:

1. **Limited access to hydrogen in infrastructure planning and markets.** It is newly introduced to the Union regulatory regime. The shortcomings are lack of hydrogen infrastructure investment which might hinder market development, possible natural monopoly in hydrogen infrastructure, and diverging hydrogen quality rules as the barriers for cross-border flows and incur additional costs. The problem is highly related to the issues, including unbundling and infrastructure planning. The key benefits to protect in the discussion is providing clarity for the investor, avoiding a non-competitive market, and keeping the flexibility to adapt and tailor the regulation for hydrogen.
2. **Limited access to renewable and low-carbon gases** in the existing gas market and infrastructure. The shortcomings include constrained market and grid access, divergence of rules regarding grid connection for renewable and low carbon gases, differences in blending and gas quality, limited access for new gases to LNG terminals, long-term supply contracts, and limit of current security of supply. The focal point of the problem is how to adapt renewable and low-carbon energy to the incumbent legislation while preparing to phase out natural gas simultaneously.
3. **Lack of sector integration in network planning in sector.** These problems may hinder decarbonisation caused by the inefficient network due to disharmonised network planning between the national and European levels. These problems involve network planning between Member States and TSOs, separated planning for electricity and gas, and lack of transparency on repurposing or decommissioning.
4. **Low customer engagement and protection** in the retail market. The shortcoming includes lack of customers' engagement, customers' protection and competition. These problems face shortcomings such as deficient competition in retail markets, insufficient customer empowerment (switching, price comparison tool, billing information, energy community, and access to data), and inadequate consumer protection for vulnerable and energy poor.

The Objectives

The proposal's objectives are

1) Increasing the level of customer engagement and protection in the green gas retail market
    a. Developing a retail market which empowers customers to make renewable and low carbon choices
    b. Increasing new entries and innovation
    c. Properly informing consumers about their consumption and the origin of energy
    d. Protect vulnerable and energy poor costumers
2) Improving hydrogen infrastructure and hydrogen markets
    a) Setting up rules on EU level on tariff-based investments in networks as well as hydrogen network ownership and operation
    b) Harmonising rules on hydrogen quality
    c) Removing barriers for cross-border hydrogen infrastructure and competitive markets
3) Integrating renewable and low-carbon gases in the existing gas infrastructure and markets
    a) Providing access to the gas wholesale market
    b) Abolishing costs for cross-border trade
    c) Facilitating connection of production facilities

d) Establishing rules on gas quality and hydrogen blending

4) Optimizing network planning
    a) Coordinating the planning and operation of the entire EU energy system
    b) Linking EU-wide ten-year network development plan ('TYNDP') and national network development plans ('NDP') in a better way
5) Providing security of supply through gas storage
    a) increasing the resilience of the EU's energy system
    b) coordinating security of supply measures across borders
    c) ensure a more effective and coordinated use gas storage and operational solidarity arrangements

Chapter 2 - Connecting Topics to Provisions

1. The Guide to the Gas Package Topics

The Package revision contains Regulation and Directive. The following table lists the key provisions per topic.

Topic	Key provisions	
	Regulation	**Directive**
1. Classification and definition	Article 2	Article 2
2. Infrastructure and network planning		
1. Sector integration	Article 9, 23	Article 51, 52
2. New hydrogen and repurposed infrastructure	Article 60	Article 31-33, 53
3. Market regulation for energy storage		
1. Unbundling of hydrogen network	Article 4	Article 56, 62-64, 68, 69, 72
2. Third-party access to hydrogen	Article 6, 7, 31	Article 31-33
3. Cross-subsidies	Recital 8, 12, 15, 60	Recital 16, Article 4
4. Tariffs for renewables and low-carbon gases	Article 15, 16	Article 31
4. Certification schemes		Article 8, 49
5. Consumer and communities		

	1. Fighting energy poverty		Article 4, 25
	2. Enhancing active consumers' role		Article 13, 14
6.	Hydrogen blending	Article 20, 23	
7.	Hydrogen trade and imports	Article 52	Article 49, 66, 79
8.	Security of supply/Preventing gas price spikes	Article 60, 67	Article 51
9.	Network Codes	Article 52-54, 55, 56	Article 75
10.	Governance		
	1. 'ENNOH', ENTSO for Gas and ENTSO for Electricity	Article 23, 40, 41, 42, 43-45	
	2. ACER, EC, National regulators	Article 24, 25, 46, 52	Article 71-72

In green key provision(s) per topic.

2. How the Gas Package Regulation Will Change your Business: Provisions per Category of Economic Operator

	Regulation	Directive
Key provisions for transmission system owner, i.e.: Any natural or legal person who legally owns the transmission system, which is the transport of natural gas through a network with a view to its delivery to customers, but not including supply.		Article 36, 55, 56, 66
Key provisions for transmission system operator (TSO), i.e.: Any natural or legal person who carries out the function of transmission and is responsible for operating, ensuring the maintenance, developing, and ensuring the long-term ability of the transmission system in a given area	Article 3, 5, 7, 9, 12- 21, 27, 28, 30-34,	Article 54, 55-59, 61, 64, 65, 66, 68
Key provisions for distribution system operator (DSO), i.e.: Any natural or legal person who carries out the function of distribution and is responsible for operating, ensuring the maintenance of, developing, ensuring the long-term ability of the distribution system in a given area. Article* includes 'EU DSO entity' issues	Article 3, 18 23*, 26, 33-35, 36*, 37*, 38*, 52*, 53*, 54*, 55*, 65	Article 9, 14, 35, 39- 43, 45, 51,
Key provisions for network user, i.e.: A customer or a potential customer of a system operator, and system operators themselves in so far as it is necessary for them to carry out their functions in relation to transport of natural gas and hydrogen.	Article 3, 5, 7, 9, 12, 15, 16, 30, 35,	Article 12, 44, 52, 57
Key provisions for hydrogen system operator, i.e.: Definition not provided by the European Commission	Article 3, 39	Article 64, 69
Key provisions for hydrogen network owner, i.e.: Any natural or legal person who legally owns the hydrogen network which is a network of pipelines used for the		Article 66, 72

transport of hydrogen of a high grade of purity with a view to its delivery to customers, but not including supply		
Key provisions for hydrogen network operator, i.e.: Any natural or legal person who carries out the function of hydrogen transport, ensuring the maintenance of, developing, ensuring the long-term ability of the hydrogen network in a given area. Article** includes 'ENNOH' issues	Article 6, 7, 13, 39, 40**, 41**, 42**, 44**, 47- 49, 52, 60, 65	Article 9, 31, 38, 46, 52, 53, 62- 66
Key provisions for hydrogen network user, i.e.: Definition not provided by the European Commission	Article 6, 48	Article 31, 32, 33, 35, 46
Key provisions for hydrogen storage operator, i.e.: Definition not provided by the European Commission	Article 8, 10, 31, 49, 60	Article 46, 56, 62, 67
Key provisions for hydrogen terminal operator, i.e.: Definition not provided by the European Commission	Article 7, 10, 11, 18-20, 31, 49, 60, 65	Article 32, 46, 50, 67
Key provisions for hydrogen terminal user, i.e.: Definition not provided by the European Commission.		Article 32

In green key provision(s) per topic.

Chapter 3 – Key Provisions on Renewable and Low-Carbon Gas

Please note: the paragraphs "Current legislation" are present to better show the novelties introduced with the new Gas Package. They are not full, in-depth analyses of the current legislative framework.

1. Classifications and Definition

Current legislation

The Directive has provisions on definitions primarily focusing on the internal market of natural gas, including LNG. Furthermore, it does not foresee provisions on the hydrogen market, e.g., Directive 2009/73/EC.

With the new Gas Package

The proposal for the new Directive deals with a broader scope of the subject by introducing a series of new definitions of renewable energy, i.e., low-carbon hydrogen/gas and renewable gas.

- According to Art 2(2), 'renewable gas' means biogas as defined in Article 2, point (28) of Directive 2018/2001, including biomethane, and renewable gaseous fuels part of fuels of non-biological origins ('RFNBOs') as defined in Article 2, point (36) of that Directive;
- According to the Article 2, point (36) of Directive 2019/2001, 'renewable fuels of non-biological origin' means liquid and gaseous fuels the energy content of which is derived from renewable sources other than biomass;
- According to Art 2(3), 'gases' mean natural gas and hydrogen;
- According to Article 2 (10), 'low-carbon hydrogen' means hydrogen, the energy content of which is derived from non-renewable sources, which meets a greenhouse gas emission reduction threshold of 70%;
- According to Article 2 (11), 'low-carbon gas' means the part of gaseous fuels in recycled carbon fuels as defined in Article 2, point (35) of Directive (EU) 2018/2001, low-carbon hydrogen and synthetic gaseous fuels the energy content of which is derived from low-carbon hydrogen, which meet the greenhouse gas emission reduction threshold of 70%.

There are other definitions related to hydrogen in the new Directive. Particularly relevant for members are hydrogen storage facilities and hydrogen terminals:

- According to Article 2 (6), 'hydrogen storage facility' means a facility used for the stocking of hydrogen of a high grade of purity:

a) *including the part of a hydrogen terminal used for storage but excluding the portion used for production [or hydrogen network] operations […];*
b) *including large, in particular underground, hydrogen storage but excluding smaller, easily replicable smaller hydrogen storage installations.*

- According to Article 2 (8), 'hydrogen terminal' means an installation used for the transformation of liquid hydrogen or liquid ammonia into gaseous hydrogen for injection into the hydrogen network or the liquefaction of gaseous hydrogen, including ancillary services and temporary storage necessary for the transformation process […].

Why it is important

The introduction of definitions related to renewable/low-carbon energy in the Package aims to support them within the European/national regulatory framework with competitiveness over fossil fuels, i.e., low-carbon hydrogen.

Not to overlook

- The definition of 'low-carbon' needs further clarification with 'GHG reduction threshold 70%' in implementation. By 31 December 2024, the Commission shall adopt delegated acts by specifying the methodology for assessing greenhouse gas emissions savings from low carbon fuels.
- The definitions of 'energy storage' and 'long-term storage' are left out. The proposal tends to utilise the term 'storage' exclusively for storage for natural gas.

Check: Regulation – Article 2 / Directive – Article 2

2. Infrastructure and Network Planning

2.1 Sector Integration/Integrated Network

Current legislation

The 2009 Gas Directive does mention the implementation of the ten-year network development plan. However, it does not discuss sector integration, e.g., Directive 2009/73/EC.

With the new Gas Package

The Package emphasises integrating the network development plan at the national and European level (the Ten-Year Network Development Plan), which is based on a joint scenario framework. The joint scenario framework refers to the coordinated planning and operation of the energy system in achieving the decarbonisation objective. The Package attempts to carry out a joint scenario development based on a sector integration between gas and electricity. Furthermore, the proposal also brings up the importance to be prepared for potential alternatives to system expansion, for instance, addressing the need for optimal energy storage and the use of demand response.

Why it is important

The sector integration between the gas and electricity sector is a starting point for implementing power-to-X technologies, ensuring flexibility in the energy market. However, it is worth noting that previous editions of the "joint scenario development" of the TYNDP have produce two distinct scenarios, where one highlights a wide and deep electrification of the energy system whereas the other relies heavily on decarbonised gas (with CCS). While

sector integration is vital, these planning exercises have struggled to produce to find alignment of gas and electricity.

Not to overlook

All transmission system operators shall submit a Ten-Year Network Development Plan every two years.
If the independent system operator or independent transmission operator do not execute an investment, the Member State's regulatory authority is required to look into steps to ensure the investments.

Check: Regulation – Article 9, 23 / Directive – Article 51, 52

2.2 New Hydrogen and Repurposed Infrastructure

Current legislation

The TEN-E Regulation from 2020 introduces hydrogen infrastructure as a new infrastructure category for European Network Development. However, the current legislation does not address the deployment of hydrogen as an independent energy carrier, e.g., Directive 2009/73/EC.

With the new Gas Package

The proposal aims to launch a harmonised regulatory framework for hydrogen infrastructure in Union for efficient cross-border interconnection.

The third-party access to hydrogen pipelines, import terminals and storage, shall be ensured. Further details on third party access are discussed on topic 3.2. Furthermore, hydrogen network activities shall be unbundled.

According to the Package, the new natural gas and hydrogen infrastructure may request to be exempted, for a defined period of time, from the provisions of certain provisions from the Package (Regulation Article 28, 27, 29, 54, Directive Article 72(7), 73(1)). The exemptions are allowed under certain conditions such as the investment enhances, not detrimental to competition and contributes to decarbonisation. The regulatory authority may decide on granting an exemption on a case-by-case basis and shall notify the exemption decision to the Commission with all the relevant information, including the detailed reasons of exemption, the duration, and the share of the total capacity of the infrastructure

Why it is important

The proposal attempts to settle the hydrogen into gas market regulatory to contribute to the decarbonisation by extending renewable and low-carbon gases in the market within the effective and transparent guideline.

Not to overlook

The right to decide on financing cross-border hydrogen infrastructure first goes to the involved Regulatory Authorities. Where the concerned Regulatory Authorities cannot reach an agreement, ACER shall decide.

According to the recitals of the Package, the exemption of certain regulatory requirements such as licenses, permissions, concessions or approvals, under related national law, is needed to prevent excessive delay in repurposing existing natural gas pipelines and other network assets for hydrogen transport. Furthermore, the Package emphasises the importance of having a sufficient cross-border capacity in hydrogen infrastructure building. The topic of repurposing is limitedly mentioned in the Package.

Check: Regulation – Article 60 / Directive – Article 53, Recital 47

3. Market Regulation for Energy Storage

3.1 Unbundling of Hydrogen Network

Current legislation

The 2009 Gas Package does not foresee provisions specifically aimed at hydrogen.

With the new Gas Package

It introduces hydrogen-related actors to the existing unbundling framework.

- Where a transmission or network operator provides regulated services for gas, hydrogen and/or electricity, it shall comply with the requirement for unbundling of accounts as laid down in Article 69 of the newly proposed Gas Directive and Article 56 of Directive (EU) 2019/944 and it shall have a regulated asset base separately for gas, electricity or hydrogen assets.
- A hydrogen network owner and hydrogen storage facility operator, which is part of vertically integrated undertakings, shall be independent at least in terms of their legal form, organisation and decision making from other activities not relating to transmission, distribution, transport and storage. The proposal describes a minimum criterion to ensure their independence.
- The Member States shall take necessary steps to ensure the accounts of hydrogen undertaking unbundled. The system of ownership or legal form shall draw up, submitted to audit and publish their annual accounts in accordance with the national law. Separate accounts for hydrogen terminals, hydrogen storage, and hydrogen transport activities shall be kept.
- The Member States should ensure that hydrogen network operators shall be unbundled within one year after the entry of the transposition period.
- In terms of unbundling of hydrogen network/storage owner/operator, the Member States shall choose its unbundling framework among ownership unbundling, independent system operator (ISO), or independent transmission operator (ITO) same as in the LNG or natural gas. However, the ITO option will expire by 31 December 2030.

The hydrogen undertaking shall prepare and submit their ownership or legal forms. Then, in the following step, they are audited and published under the rules of national law. The audit is about verifying whether the obligation to avoid discrimination, cross-subsidies, and competition distortion are respected. The penalties of up to 10% of the annual turnover are imposed for non-compliance with their respective obligations.

Regarding the derogation of unbundling, the Package explains in Directive Article 62 that the hydrogen transport, production and supply falls into unbundling derogation in the Directive on electricity market (Article 36, 54 of the Directive 2019/944).

Why it is important

This proposal introduces up-front unbundling rules to the hydrogen network and storage from production and supply that aligns with the existing unbundling framework for gas.

Not to overlook

The Commission will adopt delegated acts to set guidelines for the independence of hydrogen network owners and hydrogen storage facility operators.

Check: Regulation – Article 4 / Directive – Article 56, 62-64, 68, 69, 72

3.2 Third-Party Access to Hydrogen

Current legislation

The 2009 Gas Directive does not foresee provision on the third-party access to hydrogen, e.g., Directive 2009/73/EC.

With the new Gas Package

The Proposal newly prescribes that the Member States shall ensure the implementation of third-part access throughout the hydrogen supply chain, based on published tariffs applied in an objective, transparent and non-discriminatory manner. From January of 2031, no tariffs shall be charged for access to hydrogen networks at interconnection points between the Member States. Further details on tariffs are discussed on topic 3.4. Further provisions are:

- Third-party access in the hydrogen network shall be implemented to ensure negotiated tariffs. The regulatory authority approves the tariffs before their entry
- Regarding the hydrogen terminal, the Member States shall ensure implementing the negotiated access within the non-discriminatory provision, which is necessary for cross-border network transport of hydrogen
- Regulated third party access to hydrogen storage, line pack, and ancillary services shall be ensured while aligning with published tariffs and non-discriminatory principles.

Why it is important

The Directive identifies the role of the respective Regulatory Authorities in the Member States to apply objective standards based on methodologies underlying their calculation.

Not to overlook

Until 31 December 2030, Member State may implement its regulatory authority's necessary measures in a transparent and non-discriminatory manner instead of the third-party access system to hydrogen network according to the Directive.

Member States may implement the third-party access system to hydrogen network with its regulatory authority's necessary measures in a transparent and non-discriminatory manner.

Check: Regulation – Article 6, 7, 31 / Directive – Article 31-33

3.3 Cross-Subsidies

Current legislation

The Directive 2009/73/EC described that the regulatory authority should avoid cross-subsidies between transmission, distribution, storage, LNG and supply activities.

With the new Gas Package

The Package clarifies that public intervention should not lead to direct cross-subsidisation between different categories of customers. Cross subsidisation refers to a situation when an undertaking bears or allocates cost for one activity to another activity which can distort competition in the market. However, if cross-subsidies contribute

to the societal benefits and decarbonisation objectives without being financed by network users in the other Member States, cross-subsidise can be exceptionally accepted.

Why it is important

The proposal elucidates the avoidance of cross-subsidisation not only to natural gas and LNG but also to hydrogen supply activities.

Not to overlook

The Package does not fully set the rule on cross-subsidies and the exemptions are not fully discussed. Such issues are only mentioned shortly in a few recitals and articles.

Check: Regulation - Recital 8, Article 12, 15, 60 / Directive – Recital 16, Article 4

3.4 Tariffs for Renewables and Low-Carbon Gases

Current legislation

The present Regulation 715/2009/EC and Directive 2009/73/EC do not foresee provision for tariffs of renewable and low-carbon gases.

With the new Gas Package

Tariffs shall be applied by transmission system operators and approved by Regulatory Authorities (for further details on role of Regulatory Authorities, please check section 10. Governance). They should be transparent and non-discriminatory, facilitating efficient gas trade and competition while at the same time avoiding cross-subsidies.

The new Regulation foresees various tariffs discounts for renewable and low carbon gases. More precisely, there shall be an up to 75% discount on capacity-based tariffs at entry points from renewable and low carbon production and storage facilities. Five years after the Regulation went into force, the commission shall re-examine the tariff reductions and issue a report about the adequateness of the current tariff reductions.

As of 1 January in the year after the adoption, network users shall receive a discount of 100% on the regulated tariff from the transmission system operator at all interconnection points when providing proof of sustainability.

Further details required to implement the discount for renewable and low carbon gases shall be set in network codes.

Why it is important

This is an important step to scale up the deployments of renewable and low-carbon gases as it reduces costs in the early years when new technologies are usually still more expensive overall.

Not to overlook

The discount level of 75% may be lowered by the Regulatory Authority if cost-reflective and in line with the tariff principles in Article 15 of the regulation.

Tariffs may also be determined through market-based arrangements if approved by the regulatory authority.

Check: Regulation – Article 15, 16 / Directive - Article 31

4. Certification Schemes

Current legislation

The certification of the scheme is present in the Directive on renewable energy sources (Directive 2018/2001/EU). Nonetheless, regulation on hydrogen and renewable gas is not clearly defined.

With the new Gas Package

The Directive specifies the certification scheme on renewable gases (including hydrogen) and low-carbon gas to 70% of emission, in accordance with the definition in the Directive (Article 2). The undertakings shall be certified, approved, and designated by the regulatory authority as having complied with the requirements. The Regulatory Authorities shall open a certification procedure in these situations:

- Upon certified undertakings, notify any planned transition which may require a reassessment of their compliance with the requirement:
- On the initiative of the undertakings where they have knowledge that planned changes might lead to an infringement of the regulatory framework.
- Upon a reasoned request from the Commission.

The obligation to submit reliable information shall be applied regardless of whether the low-carbon fuels are from the Union or the third countries.

The information about the geographic origin and feedstock type of low-carbon gases should be available to consumers through websites.

The certification is supervised and audited under the voluntary scheme by competent authorities of the Member States. The Regulatory Authorities should also adopt the decision on the certification of the hydrogen network operator or owner within 100 working days from the notification by the hydrogen network operator or the Commission request.

Why it is important

The Directive defines the aim of the certification scheme on renewable gases and low-carbon gas for the first time.

The transparent and credible certificates facilitate cross-border interconnection and trade with third countries. The certification of renewable and low-carbon hydrogen shall be included in the intergovernmental agreement as one of the necessary contents.

Not to overlook

The websites with the information about the geographic origin and feedstock type shall be updated on an annual basis.

To specify the methodology for accessing greenhouse gas emission saving from low carbon fuels (70% threshold), the Commission shall adopt delegated acts by 31 December 2024.

Check: Directive – Article 8, 49

5. Consumer and Communities

5.1 Fighting Energy Poverty

Current legislation

The Directive 2009/73/EC approaches the energy poverty issue by integrating a framework for social policy and enhancing energy efficiency.

With the new Gas Package

The Directive lets the Member States define the 'vulnerable customers' concerning natural gas and hydrogen. Vulnerable customers, who are most likely small enterprises or individuals, are entitled to a high level of consumer protection which means Member States need to implement adequate safeguards such as but not limited to the prohibition of disconnection for vulnerable consumers in critical times.

The Member States may intervene in the price setting for the supply of natural gas for energy poor or vulnerable household customers. Such interventions in the price setting need to be transparent, proportionate, non-discriminatory and pursue a general economic interest. If the Member States undertake such measures, they must notify the European Commission within one month after their adoption.

Furthermore, Member States should set up protection measures for final customers in remote areas.

Why it is important

The Directive demonstrates a more direct approach of the Member States to protect the consumers struck by energy poverty compared to incumbent legislation.

It prevents vulnerable consumers from being cut off the gas supply due to their inability to pay.

Not to overlook

The Directive clarifies that the public interventions in the natural gas supply shall not hinder the effective competition of the market.

Check: Directive – Article 4, 25

5.2 Enhancing Active Consumers' Role

Current legislation

In the Annex I, point 2 of 2009 Gas Directive (Directive 2009/73/EC) briefly mentions the active participation of consumers in the gas supply market, only related to the implementation of intelligent metering system.

With the new Gas Package

The Directive illustrates the active consumers' rights to access existing networks in an equal and transparent manner. In particular, Member States need to ensure that there are no disproportionate or discriminatory requirements, procedures or charges for active consumers.

Member states need to grant active consumers storing renewable gas the right to a grid connection as well as to provide several services simultaneously, and they need to protect those active consumers with storage facilities from any double charges as well as disproportionate licensing requirements or fees.

In the case of citizen energy communities, Member States provide consumer protection by providing an enabling regulatory framework that ensures them to keep their rights and obligations as household customers and grants them fair compensation as well as proportionate and transparent charges. Citizen energy communities are entitled to cross-border participation.

Why it is important

It is a form of behind-the-meter energy storage which provides a decentralised measure contributing to the security of supply and helps to facilitate the use of renewable and low-carbon gas in the natural gas system.

Not to overlook

Active customers and Citizen Energy Communities are financially responsible for the imbalances they cause in the natural gas system, which might disincentivise the choice to become active in the market.

Check: Directive – Article 13, 14

6. Hydrogen Blending

Current legislation

The present Regulation 715/2009/EC does not foresee such provision.

With the new Gas Package

Transmission system operators of the natural gas shall accept 5% hydrogen blending at interconnection points between the Member States from 1 October 2025. Hence, they may decline gas flows with a hydrogen blend if the share of hydrogen exceeds 5%.

The gas quality and the current and foreseen developments of level and volume of hydrogen blending shall be published in a gas quality monitoring report starting by 15 May 2024 at the latest. Limited provisions on this topic were elaborated by the Commission.

Why it is important

Despite the recognition of less efficiency of blending in decarbonisation, the Regulation ensures the 5% by volume of hydrogen blending in the natural gas system.

Not to overlook

When the per cent of hydrogen content exceeds 5% by volume, transmission system operators do not have an obligation to accept the gas flows.

Check: Regulation – Article 20, 23

7. Hydrogen Trade and Imports

Current legislation

The Directive 2009/73/EC does not foresee such provision on hydrogen trade with the third countries.

With the new Gas Package

The same obligations regarding the certification apply for imported renewable and low-carbon gases as for the ones produced within the European Union.

According to the Regulation, hydrogen interconnectors between the Member States and third parties are subject to the same network codes and guidelines as the domestic hydrogen network of a single Member State.

Hydrogen interconnectors between the Member States and third countries shall adapt to the existing rules applicable to hydrogen networks which are set out in the revised directive and regulation. Member States are obliged to conclude an intergovernmental agreement with the third countries prior to the start of operation of a new interconnector, and it is the Member State's obligation to check and enforce these rules.

Why it is important

The Directive proposes to extend the provisions that apply to domestically produced hydrogen towards third countries in trading to the hydrogen sector. Considering the substantial amount of imported natural gas to the Union, it is essential to settle the legal framework for hydrogen, which may be helpful for security of supply and facilitation of the cross-border interconnection by having a unified framework within the Union.

Check: Regulation – Article 52 / Directive – Article 49, 66, 79

8. Security of Supply

Current legislation

The current legislation deems natural gas to be essential for the European Union's security of supply and does not consider the role which renewable and low-carbon gases can play in this matter, e.g., Regulation 2017/1938/EC.

The Directive 2009/73/EC recognises the dependence on imports and emphasises that the Member States should address the security of supply concerns when establishing intergovernmental agreements with third countries.

With the new Gas Package

The Directive introduces renewable and low-carbon gases as an additional measure for the security of supply by diverging energy sources and securing the energy supply chain in the Union. Having different types of gases to rely on for security of supply with different origins, geographically and in terms of feedstock used for producing the gas, decreases the dependence on natural gas imports. On the other hand, the Package still upholds the importance which is granted to natural gas in the current legislation. Therefore, the role of renewable and low-carbon gases is still limited in the provisions.

Why it is important

Despite the limited provisions discussed in the previous paragraph, the Commission identifies in the introduction of the regulation of the Gas Package several objectives: promoting renewable and low-carbon gases is to decarbonise these sectors, increase the flexibility of the electricity system thanks to power-to-X technologies,

strengthen the security of supply by reducing dependence on natural gas imports and allow to store (and produce) electricity.

Not to overlook

The Commission published a toolbox in October 2021 as a response to the spiking gas prices (COM(2021) 660 final) which impacts security of supply issues as well.

Check: Regulation – Article 60, 67 / Directive - Article 51

9. Network Codes

Current legislation

The current Regulation 715/2009/EC includes provisions on the development of network codes for natural gas but does not foresee such provisions for renewable and low-carbon gases.

With the new Gas Package

There is a newly added chapter on network codes and guidelines in the new Regulation. It empowers the Commission to adopt Network Codes through the means of Implementing or Delegated Acts on the basis of text proposals developed by the ENTSO for Gas or the ENNOH. The Commission is empowered to adopt implementing acts in order to ensure uniform conditions for the implementation of this Regulation by establishing network codes in the area of transparency rules.

After the adoption of network codes and guidelines by the Commission, ACER shall monitor their implementation by the ENNOH. Where the ENNOH has failed to implement such network codes or guidelines, ACER shall request the ENNOH explanation and to communicate that, together with its opinion thereon, to the Commission.

The Commission is empowered to adopt delegated acts to establish network codes in the area of the following topics:

- Energy efficiency regarding hydrogen networks
- Interoperability rules for the hydrogen network
- Rules for the system of financial compensation for cross-border hydrogen infrastructure
- Capacity-allocation and congestion-management rules
- Rules regarding harmonised tariff structures for hydrogen network access
- Rules for determining the value of transferred assets and the dedicated charge
- Balancing rules including network-related rules on nominations procedure, rules for imbalance charges and rules for operational balancing between hydrogen network operators' network
- Cyber security aspects of cross-border hydrogen flow.

Why it is important

Network codes are key for providing and managing effective and transparent access to the transmission networks across borders and to ensure coordinated and sufficiently forward-looking planning and sound technical evolution.

Check: Regulation – Article 52-54, 55 / Directive – Article 75

10. Governance

10.1 'ENNOH', ENTSO for Gas, and ENTSO for Electricity

Current legislation

The present legislation does not foresee provision for governing bodies specifically for renewable and low-carbon gases as they were not discussed in the previous Gas Package. Cooperation with ENTSO for Electricity is also not foreseen. However, the current Regulation 715/2009/EC sets out requirements for the establishment of ENTSO for Gas and gave it the task, inter alia, to elaborate the network codes and monitor their implementation, as well as to publish and regularly update a non-binding Union wide TYNDP.

With the new Gas Package

The new Gas Regulation introduces a new governance structure specifically for hydrogen, the European Network of Network Operators for Hydrogen (ENNOH), to facilitate hydrogen network operators' cooperation at the Union level. The hydrogen network operators should draft ENNOH' statutes, a list of members, and draft rules the latest by 1 September 2024.

It should ensure optimal management of the Union hydrogen network and allow trading and supplying hydrogen across borders in the Union. ENNOH 's tasks shall be to;

- regularly publish a non-binding Union-wide Ten-Year Network Development Plan (TYNDP) for hydrogen, closely the cooperating with ENTSO for Gas and ENTSO for Electricity; the first one should be published by 2026
- recommend how to coordinate cooperation of natural gas DSO and TSO with hydrogen network operators, but also between Union and third-party network operators
- adopt an annual work programme, an annual report, and an annual outlook for the supply of hydrogen
- adopt a biannual hydrogen quality monitoring report starting 15 May 2026.

Until the ENNOH is established, a temporary platform should be set up under the leadership of the Commission with the involvement of ACER and all relevant market participants, including the ENTSO for Gas, the ENTSO for Electricity and the EU DSO entity.

The ENTSO for Gas's Union-wide TYNDP work will now include modelling of the integrated network, including hydrogen networks, scenario development, a European supply adequacy outlook and an assessment of the resilience of the system.

Why it is important

With a hydrogen network expected to grow extensively, a separate association specifically for hydrogen is essential to effectively manage infrastructure planning, development and operation of the hydrogen network.

Not to overlook

While ENNOH is responsible for the hydrogen network as a whole, one of its main purposes is to particularly contribute to the efficient integration of hydrogen produced from renewable energy sources.

The costs related to the activities of the ENNOH shall be borne by the hydrogen network operators.

Check: Regulation – Article 23, 40, 41, 42, 43-45

10.2 ACER, EC, and National Regulatory Authorities

Current legislation

The present Regulation 715/2009/EC and Directive 2009/73/EC generally do not foresee provision for governing bodies for renewable and low-carbon gases. However, the Directive obligates National Regulatory Authorities to take all reasonable measures to integrate large- and small-scale production as well as access for new market entrants of gas from renewable energy sources.

With the new Gas Package

With the new Gas Regulation, ACER is tasked to monitor the execution of the tasks of the ENNOH and report its findings to the Commission. In particular, ACER shall:

- provide an opinion to the Commission on the drafts of ENNOH's statutes, list of members and rules within four months
    - ➔ The Commission has then three months to deliver its amendments which will be the basis for the hydrogen network operators to publish the final version of ENNOH's statutes, list of members and rules of procedure.
- provide its opinion to the Commission on, and if necessary, recommendations on how to improve, ENNOH's draft annual work programme or the draft Union-wide network development plan

The new Gas Directive assigns National Regulatory Authorities some new tasks. More specifically, National Regulatory Authorities shall:

- promote a competitive, flexible, secure and environmentally sustainable internal market in natural gas, renewable and low-carbon gases and hydrogen within the Union
- ensure appropriate conditions for the effective and reliable operation of natural gas and hydrogen networks in order to achieve the Union's climate and energy goals, for which they should closely cooperate with Regulatory Authorities of other Member States, the Commission and ACER
- eliminate restrictions on the cross-border trade of gases, including the elimination of restrictions due to differences in the quality of gases or differences in the volume of hydrogen blended into the natural gas system or to differences in the quality of hydrogen in the hydrogen system
- facilitate the operation of gas from renewable sources in relation to other energy networks of electricity and heat for a better sector integration
- ensure compliance of TSOs/DSOs, system owners, hydrogen network operators as well as of any natural gas and hydrogen undertakings and other market participants, including citizen energy communities with their obligations under this Directive, the network codes and guidelines and other relevant Union legislation, as well as ACER's decisions
- monitor the quality and quality management of gas and hydrogen.
- impose effective, proportionate and dissuasive penalties on those entities where they do not comply with their obligations under the Gas Directive, or any relevant legally binding decisions of the regulatory authority or of ACER, or to propose that a competent court impose such penalties (only for Regulatory Authority located in the Member State in which the ENTSO for Gas, the ENNOH or the EU DSO entity has its seat).

Why it is important

Strong oversight by ACER can provide effective checks and balances for the energy sector, which is crucial for a well-functioning system. Just as for the electricity and gas sector, the hydrogen network also profits from ACER overseeing the effective functioning of the integrated hydrogen markets and cross-border infrastructure.

Furthermore, it is important to have the National Regulatory Authorities ensure a smooth integration of renewable and low carbon gases to ensure the decarbonisation of the gas sector.

Not to overlook

The regulatory authority shall have the following duty to respect contractual freedom with regard to long-term contracts provided they contribute to decarbonisation objectives. No long-term contracts for the supply of unabated fossil gas shall be concluded with a duration beyond the end of the year 2049.

Check: Regulation – Article 24, 25, 46, 52 / Directive - Article 71-72

Annexes

1. Conversation with Augustijn van Haasteren and Benedikt Klauser (European Commission) on the Hydrogen and Decarbonised Gas Package Proposal

For a general questions and answers prepared by the Commission on regarding issue, please check here: https://ec.europa.eu/commission/presscorner/detail/en/QANDA_21_6685

Interviewees: Augustijn van Haasteren and Benedikt Klauser from unit C2 of DG Energy at the European Commission.

The RED III and the Hydrogen and Decarbonised Gas Package share their aims in increasing the renewably sourced energy in the market. So how does the EC deal with avoiding double legislation regarding REDIII and Hydrogen and Decarbonised Gas Package? For instance, when it comes to Power-to-Gas (PtG)?

Augustijn van Haasteren - The Proposal does not affect PtG directly. It more affects to market rules of the electricity market. The gas storage, of course, falls under the Gas Package, but PtG is arguably not storage (or at least electrolyser). We primary speak about underground storage. The role of underground storage they see differently from natural gas storage because natural gas storage is seasonal storage to hit demand peaks. However, hydrogen is rather seen for industrial demand for now and does not have a seasonal character at the moment. Furthermore, the availability of storage facilities is important for the business case of the electrolyser. Additionally, it is too expensive today. The importance of underground storage for the markets relates to its relatively short supply and narrow technologies compared to natural gas storage.

Is there the possibility of a grey area for the Member States to have it under electricity or gas legislation?

Benedikt Klauser – Under the new proposal, electrolyser would not fall under hydrogen storage definition, which covers only underground storage. You might argue that the electrolysers fall under REDIII under certain conditions, which I personally hardly envisage. Electricity TSO are dependent on hydrogen electrolysers, as it is only applicable to electricity.

If the TSO could have both salt cavern and electrolysers, it would fall under the Gas Package?

Benedikt Klauser - No, it is because there are no such specific rules in the Gas Package. It will be under electricity storage. TSO would need to prove the dependence on electricity to ensure all the services and need to prove no readiness of the market. In this scenario, if they store hydrogen, they cannot sell hydrogen. In other words, you cannot be a market actor but only store hydrogen to keep the system running.

Augustijn van Haasteren – Furthermore, the cost efficiency of the system matters, and it is not very cost-effective for now. Considering the long term or seasonal storage, if there are two convergent steps, it is not very efficient.

Flexibility can be provided at a much lower cost by other flexibility offers than PtG. Electrolysers can be used better for other services in my personal opinion.

How does EC foresee ensuring the security of supply? How do you think this set of rules will change the situation?

Augustijn van Haasteren - Security of supply issues does not apply to the hydrogen market. However, it does not mean that the hydrogen package cannot contribute to the security of supply. It can do only under certain conditions. High flexibilities from enough electrolysers might have a role in the security of supply considerations. At the moment, the security of supply is left out in the scope of the hydrogen market. We need to keep in mind two things. Firstly, there are more sophisticated users in the hydrogen market. Secondly, the supply regulation in the gas market is not compatible yet. It is about the lack of infrastructure. In the hydrogen market, we have to double the investment in the early stages. Through gas supply regulation, the solidarity applies to vulnerable/small customers in the next ten to fifteen years as they are not expected to connect to the hydrogen system yet.

According to the Package, the definition of 'low-carbon hydrogen' has a 70% of threshold and is there any possibility for further explanation on the calculation method? Will further details in the calculation method be provided through the delegated act?

Augustijn van Haasteren – It is important to complement the renewable legislation. The technical details will be provided in a delegated act. A denominator of 70% is related to the comparative perspective. Therefore, it is not yet defined. When it comes to hydrogen, it might be compared to natural gas. However, at the same time, the article may also apply to low-carbon fuels and another complement that can play the role. Due to these diverse types of fuels, the article is left open, not applicable only to hydrogen.

The repurposing of the gas infrastructure is only briefly mentioned in the Gas Package without any further elaboration. What would be the rationale for the EC not foreseeing stronger provisions on repurposing?

Augustijn van Haasteren - The existing barrier in repurposing is the absence of rules for hydrogen operators. It was even prohibited for the natural gas operator who is active in the hydrogen system. Therefore, setting rules and conditions for gas operators has elements of grandfathering permits and certification and cross financing for hydrogen. As the repurposing depends on network planning and demand on the hydrogen market, it is hard for us to decide the matters in repurposing issue.

How do you foresee ancillary services to be provided in the context of the Gas Package? EASE welcomes the focus on energy storage and ancillary services participation of final consumers; however, such issue was not addressed much in the proposal. What degree of participation do you foresee?

Augustijn van Haasteren – REDIII deals with flexibility related to the demand side, not the Gas Package. The current rule is specifically designed in a large scope of participation of flexibility providers in the market, at least at EU level secondary legislation. There is a lack of compatibility depending on the rules of selecting balancing providers. As it is closer to electricity market matters, the answers can be found in RED. There will be more freedom to talk about such issues in detail in the later stage.

What is the expected role of ENNOH and the rationale behind its establishment?

Augustijn van Haasteren - Hydrogen has its own users and suppliers, and off-take side, it will be different from the natural gas system. The rules for hydrogen should be specific for hydrogen, not natural gas. Furthermore, we need to set up the rules focusing on cost-effectiveness for hydrogen users and hydrogen network users. If you want an electrolyser to supply ancillary storage, you need to keep in mind that the rules will be different from the existing rule for natural gas. Rules on hydrogen will require a significant amount of repurposing, which would be related to the determining role of ENNOH. However, there is no need to build one specific rule to control all of them.

The ACER role aligns with ENNOH's role, except the network planning side. ENNOH will take over the network planning for hydrogen. The integrated network will be enhanced despite the establishment of ENNOH. It will take time to set up ENNOH and its members. Therefore, it should be comparable to ENTSO for Gas and ENTSO for Electricity as an institution over the transition period.

What is the rationale behind the 5% hydrogen blending, and is there a possibility the blending scheme may hinder hydrogen deployment?

Augustijn van Haasteren - blending is not at its endgame scenario. First of all, the 5% is not a cap. TSO is allowed to accept more than 5% when the agreements are made. As the 5% threshold only applies to the cross-border points, the hydrogen blending degree can be much higher at the national level. The scheme is to ensure taking integrity of the alternative gas market upright.

2. Secondary Legislation

Regulation section			Empowerment	Deadline
	Regulation (Art 63)	Directive (Art 83)		
Product requirements	Art 5-7, 56		Delegated act: details of third-party access services	
Product requirements		Art 8	Delegated act: methodology for assessing greenhouse gas emissions savings from low carbon fuels	By 31 December 2024
Product requirements	Art 9, 10, 56		Delegated act: application of congestion-management procedures	
Product requirements	Art 13		Delegated act: certification of transmission system operator and hydrogen network operators	
Product requirements	Art 16		Delegated act: details of tariff methodology related to cross-border trade of natural gas	TBD
Product requirements		Art 17	Implementing act: smart metering and its procedures	TBD
Product requirements		Art 22	Implementing act: interoperability of energy services	TBD
Product requirements	Art 28		Delegated act: defining geographical area for regional cooperation of transmission system operators	TBD
Product requirements	Art 30, 31, 56		Delegated act: details of the provision of information, definition of the technical information necessary for network users	
Product requirements	Art 51	Art 46	Implementing act: common specification on responsibility of hydrogen network, storage and terminal operators	
Product requirements	Art 52		Implementing or Delegated act: adoption of network codes and guidelines	

Product requirements	Art 53		Delegated act, implementing act: establishment of network codes	TBD
Product requirements	Art 54		Delegated act, implementing act: establishment of network codes for hydrogen Implementing act: specifications in a network code pursuant	TBD
Product requirements	Art 56		Delegated or Implementing act: guidelines of network code procedure	TBD
Product requirements		Art 56	Delegated act: guidelines for unbundling of the transmission system or hydrogen network owner and of the storage system or hydrogen storage operator	TBD
Product requirements	Art 60		Delegated act: guidelines for the conditions for exemption under certain conditions for new natural gas and hydrogen infrastructure	TBD
Product requirements		Art 66	Delegated act: details of certification in relation to third countries	TBD
Product requirements		Art 74	Delegated act: guidelines of duties of the regulatory authorities to cooperate with each other and with ACER	TBD
Product requirements		Art 75	Delegated act: guidelines of compliance with the network codes	TBD
Product requirements		Art 76	Delegated act: guidelines of methods and arrangements for record keeping	TBD

3. Other Key Policies and Legislative Actions

The Gas Package is in line with the EU's existing legislation to achieve the shift towards a more sustainable energy system and to achieve the goal of EU climate neutrality in 2050. It complements this legislation, including:

- Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC (Text with EEA relevance) - Emission Trading Scheme ('ETS')
- Council Directive 2003/96/EC of 27 October 2003 restructuring the Community framework for the taxation of energy products and electricity (Text with EEA relevance) - Energy Taxation Directive
- Directive 2009/73/EC Member States shall ensure the implementation of intelligent metering systems that shall assist the active participation of consumers in the gas supply market.
- Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency Text with EEA relevance - REMIT Regulation (EU) No 1227/2011
- DIRECTIVE 2014/94/EU of the European Parliament and of the Council of 22 October 2014 on the deployment of alternative fuels infrastructure (Text with EEA relevance) - revised Alternative Fuels Infrastructure Regulation ('AFIR')
- Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010 (Text with EEA relevance)
- Directive (EU) 2018/844 of the European Parliament and of the Council of 30 May 2018 amending Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency (Text with EEA relevance) - Energy Performance of Buildings Directive ('EPBD')
- Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (Text with EEA relevance) - revised Renewable Energy Directive ('RED II')
- Directive (EU) 2018/2002 of the European Parliament and of the Council of 11 December 2018 amending Directive 2012/27/EU on energy efficiency (Text with EEA relevance) - Energy Efficiency Directive ('EED')
- Regulation (EU) 2019/631 of the European Parliament and of the Council of 17 April 2019 setting CO2 emission performance standards for new passenger cars and for new light commercial vehicles, and repealing Regulations (EC) No 443/2009 and (EU) No 510/2011 (Text with EEA relevance.) - Regulation setting CO2 emission standards for cars and vans
- Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators (Text with EEA relevance.) - ACER Regulation (EU) 2019/942
- Commission Delegated Regulation (EU) 2020/22 of 31 October 2019 amending Annexes I and III to Regulation (EU) 2019/631 of the European Parliament and of the Council as regards the monitoring of CO2 emissions from new light commercial vehicles type-approved in a multi-stage process (Text with EEA relevance) - Amendment of the Regulation setting CO2 emission standards for cars and vans
- Communication COM/2021/660 final tackling rising energy prices: a toolbox for action and support

Upcoming legislation in 2022 may further impact the gas sector, e.g.,

- Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2018/2001 of the European Parliament and of the Council, Regulation (EU) 2018/1999 of the European Parliament and of the Council and Directive 98/70/EC of the European Parliament and of the Council as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 - REDIII
- Proposal for a Directive of the European Parliament and of the Council on the energy performance of buildings (recast)
- Proposal for a Regulation of the European Parliament and of the Council on guidelines for trans-European energy infrastructure and repealing Regulation (EU) No 347/2013 - TEN-E Regulation
- Proposal for a Council Directive restructuring the Union framework for the taxation of energy products and electricity (recast) - Revision of the Energy Taxation Directive
- Proposal for a Regulation of the European Parliament and of the Council on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU of the European Parliament and of the Council - revised Alternative Fuels Infrastructure Regulation ('AFIR')
- Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2019/631 as regards strengthening of the CO2 emission performance standards for new cars and new light commercial vehicles in line with the Union's increased climate ambition
- Proposal for a Regulation of the European Parliament and of the Council on the use of renewable and low-carbon fuels in maritime transport and amending Directive 2009/16/EC (Text with EEA relevance) - FuelEU Maritime proposal
- Proposal for a Regulation of the European Parliament and of the Council on ensuring a level playing field for sustainable air transport (Text with EEA relevance) - REFuel EU Aviation proposal

Notes

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