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GIE Position Paper on the Additionality Principle

Proving the renewable character of hydrogen is key to achieve the EU Green Deal targets. Therefore, the impact of criteria like the additionality principle and its temporal and geographical correlation on the hydrogen market ramp-up must be duly analysed. Voicing around 70 members from 27 countries, GIE presents the key elements that are at stake.

[Download the GIE Position Paper on the Additionality Principle here.](#)

But first, what is the Additionality Principle about?

- Renewable Fuels of Non-Biological Origin (RFNBOs), first and foremost renewable hydrogen, enable the integration of renewable energy in an efficient way, thereby accelerating the process of the energy transition.
- As a Delegated Act that builds on the Renewable Energy Directive (RED), the Additionality Principle sets out to ensure the renewable production of RFNBOs and the overall emission decrease by using electricity from additional renewable power generation and ensuring a temporal and geographical correlation in production.
- However, in doing so, the Additionality Principle as currently expected risks placing serious roadblocks for a swift and comprehensive hydrogen ramp-up in Europe.

RFNBOs in the energy transition

RFNBOs, especially hydrogen, will play a crucial role in our future energy system. In this position paper, GIE explains why straightforward, market-based, well-functioning, and non-discriminatory rules on the conditions under which RFNBOs are accounted for as renewable energy are essential to the success of the energy transition.

Boyana Achovski, Secretary-General of GIE states: *“Now is the time to lay the framework for the hydrogen economy in Europe. We must ensure a framework is established that promotes the market ramp-up of hydrogen. Applying a holistic approach in this process is crucial. One thing is clear – Europe cannot afford setting rules and barriers that disincentivise hydrogen investments in Europe.”*

GIE’s key messages are:

- ➔ Imposing a strict and narrow temporal correlation is cost-increasing for the energy system and it endangers the investment and market ramp-up of RFNBOs.
- ➔ Geographical location of electrolysers should be based on system-efficiency and decarbonisation effectiveness.
- ➔ According to proportionality and dynamic regulation principles, an adequate phase-in period and detailed analysis on the whole energy system are necessary for the

application of any additionality principle; this should be coordinated to also reflect national specificities.

- More regulatory flexibility is needed to avoid hampering renewable energy investments and their development; RFNBOs facilitate renewable electricity integration and speed up its development.
- Once additionality attributes are included, Guarantees of Origin should act as the main mean of proving additionality.

Ralph Bahke, Sponsor of GIE New Gases Area explains: *"It goes without saying that hydrogen – like other energy carriers – must prove its renewable origin. To achieve this, the following elements should apply: proportionality in regulation, non-discrimination, lack of market distortion, effectiveness and efficiency from a whole-system perspective."*

Voicing Europe



GIE is the association of the European operators of the gas infrastructure. It gathers around 70 members from 27 countries active in gas transmission, underground storage and import terminals. GIE members work and innovate to support the different regions to deliver EU Green Deal's objectives. Existing and future gas infrastructures are crucial assets for Europe: they can set the EU on track for global leadership for hydrogen while making sure no one is left behind in the process.

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