



Highlights from the EU debate on H₂ certification

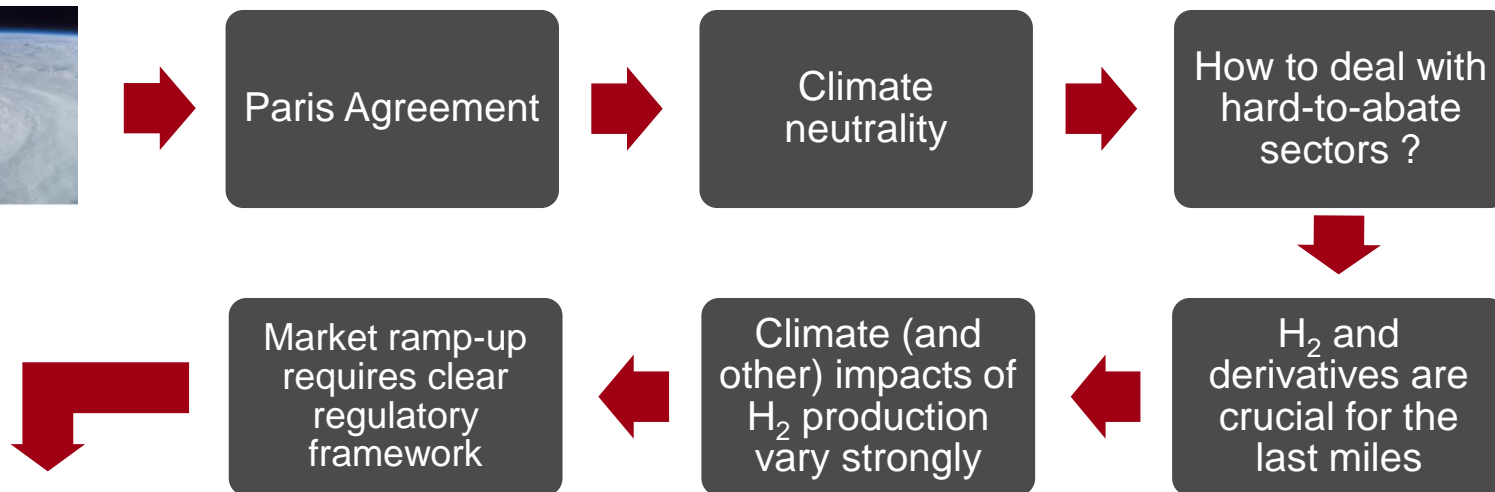
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Logical chain for H₂ sustainability certification in Germany / EU



Source: NASA



General questions:

- From what level of emission intensity does H₂ usage make sense in different sectors?
- How to define and measure the (climate) impact of various H₂ production chains?
- How to establish widely accepted standards and certification schemes?

Various purposes of H₂ certification in the EU



- a) Compliance with the EU Renewable Energy Directive of 2018 (RED II)
- b) Compliance with hydrogen support schemes currently in the pipeline
 - e.g. for the CfD in Germany's H2Global Program
 - e.g. for an electrolyser in Germany to be exempted from the RES-E levy
 - e.g. for complying with future quota for aviation fuel
 - e.g. for industrial users or importers to comply with future versions of EU ETS / carbon Border Adjustment
- c) Voluntary certification (e.g. for customers asking for clean steel, clean ammonia etc.)

Common denominator: the GHG intensity thresholds maybe initially be relatively unambitious, but they will rapidly develop towards true climate neutrality (= 0.0 gCO₂/MJ or compensation for via e.g. Direct Air Capture)



- “ ... switching to hydrogen, preferably **from renewable sources** ... “
- “ ...emphasis should be given to hydrogen **from renewable sources** in view of its key role for the achievement of the decarbonisation objective ...”
- “...especially with regard to unavoidable process emissions and **temporarily complementing the renewable hydrogen** production (....) **CCS and CCUS may play a role** for the decarbonisation for the Member States that choose this technology.”
- “ ... promoting the development of guarantees of origin for better traceability of hydrogen **from renewable sources**, promoting renewable fuels of non-biological origin ...”
- “ ... international value chains (...) as potential for cost-competitive **renewable hydrogen** “

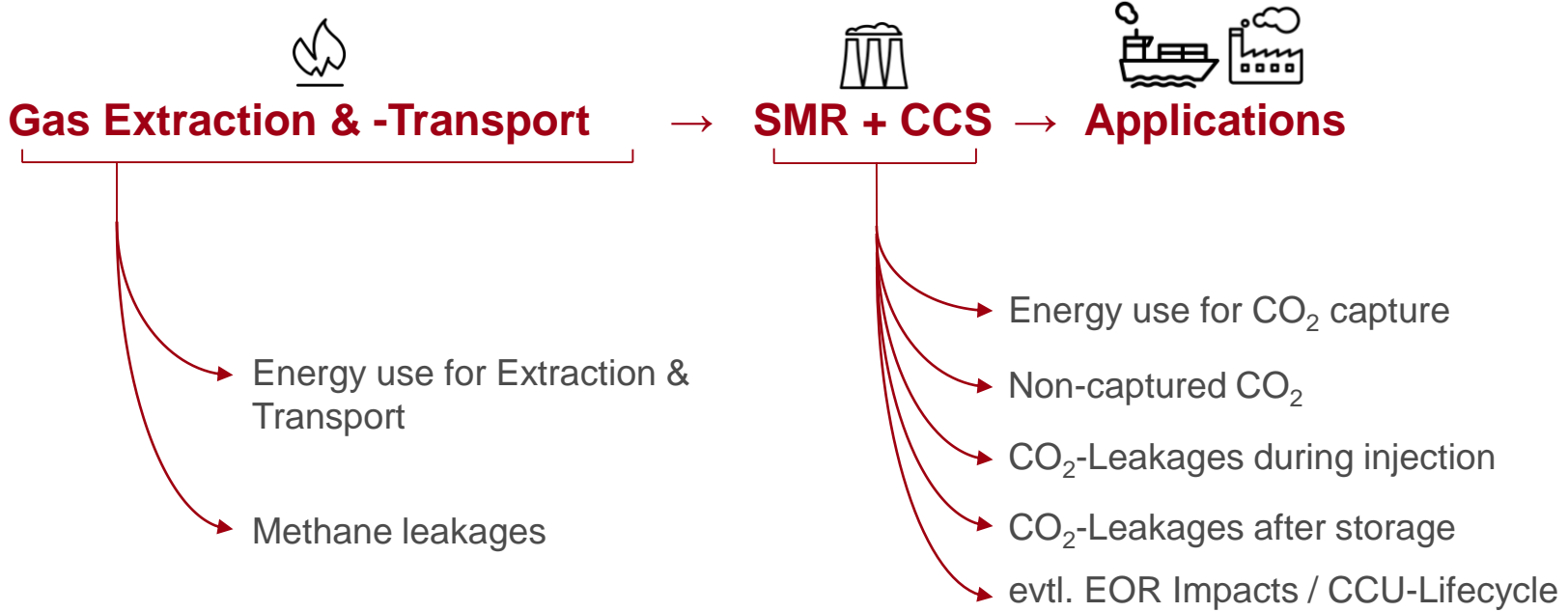
What's the EU Council: the most climate conservative EU institution
(Parliament & Commission are usually “greener” than the Council)

Overall message: EU actually wants green H₂, but it will temporarily accept blue (if it is really low GHG), during a transition period of uncertain duration



- GHG emission intensity of the electricity for electrolysis (dynamic thresholds?)
- Additionality of renewable investments
- Simultaneity of electrolysis with times of high renewable generation
- For imports: general progress of the export country on climate protection / energy transition
- Water usage, biodiversity, social impacts
- Possibly life-cycle approach, including e.g. impacts of the production of wind turbines or solar systems

Blue-H2: Sources of GHG-Emissions



- Remaining CO₂ emissions at capture, injection (!) and after storage
- Methane-leakages from well to SMR facility (including satellite monitoring)
- GHG impact of methane: 100 or 20 years? Acute climate crisis makes the argument for 20 years
- Emission intensity benchmarks for all alternatives
 - Other sources of H₂ (with dynamic view of power sector decarbonisation)
 - Direct electrification // Energy savings
 - Fossil energy usage without H₂
- Internationally agreed third party certification procedures (third party refers also to upstream methane emissions and injection phase !)

- Climate mitigation is key driver for H₂ roadmaps and policies
- Regulatory framework still in its infancy, but it will evolve dynamically
- In 1st phase, H₂ GHG emission (and other sustainability) standards must take into account the still high level of power sector emission in EU and elsewhere, and the need to get the clean H₂ market up and running
- But in the medium term, GHG emission standards will get closer and closer to true climate neutrality
- I personally would anticipate this and would not make long term investments in “grey-green” or “grey-blue” H₂ => It might be accepted today, but not any longer tomorrow.

Thank you for your attention

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