

Dear participants of the 25th of October PCI/PMI list High-Level Decision-Making meeting,

Dear attachés,

The undersigned organizations and signatories from across Europe are writing you to express our serious concerns in relation to the first Union List of Projects of Common and Mutual Interest (PCI/PMI List) under the revised TEN-E Regulation, which will be discussed in the upcoming High Level Decision-Making Meeting which will take place on 25th of October. We are aware that, on this occasion, decision-makers will discuss the projects to be included in the PCI/PMI list, which is scheduled to be published in November, and we would like to express our concerns about plans to include certain hydrogen-related projects in the list.

In the current context of severe energy and climate crisis, there is a growing trend to consider green hydrogen as one of the most appropriate options to contribute to the decarbonization of the economy and achieve climate neutrality well before 2050. The European Union has incorporated it into its priorities and investment plans, and green hydrogen initiatives have been multiplying. This has led to the beginning of a **frantic rush to develop numerous projects, some of which risk not being needed in the future**, as they are oversized and do not respond to the needs of the energy transition.

This is the case of the **H2Med project**, submitted by the gas network operators of Spain (Enagás), Portugal (REN) and France (GRTgaz and Teréga) to the December 2022 call for proposals. According to promoters, this project aims to be the first European green hydrogen corridor and it will enable to transport two million tons of hydrogen from the Iberic peninsula to central Europe, through two transboundary interconnections: a terrestrial interconnection between Portugal and Spain (H2Med-CelZa) and a submarine interconnection between Spain and France (H2Med-BarMar).

Although H2Med is presented as one of the main solutions for the EU to accelerate its progress towards decarbonization, there are **severe concerns about its real need and usefulness, which is why the undersigned organizations and signatories strongly reject it.**

Firstly, **renewables based, so called green hydrogen is still at a very premature stage of development.** It is an immature technology in terms of large-scale production as well as transport and storage. For it to make a real and significant contribution to the EU climate targets, major advances in terms of technology and efficiency are needed as well as lower production costs, as we are still far from being able to consider it economically competitive.

It is also important to underline that, **in case of blending (i.e. the mixing of hydrogen and fossil gas/methane), green hydrogen could be used as an excuse to lock us into decades of further dependence on fossil gas**, which is unacceptable because of its severe impacts on people and the climate.

Also, **the environmental, climate, land and social impacts of large-scale green hydrogen production cannot be ignored.** The massive unnecessary deployment of

renewable energy projects for the exclusive supply of electrolyzers may not only lead to adverse impacts on the environment and biodiversity, but could also face poor social acceptance, mainly due to the lack of prior dialogue with the affected communities. It can also lead to severe effects on the climate due to its high leakage risk^{1,2}.

It is clear that renewable based hydrogen has an important role to play in the process of decarbonization of the economy and in the energy model of the future. However, proper planning is needed to clearly define where to produce it and which uses are viable and should be given priority. **Given the difficulties associated with long-distance transport of green hydrogen from a climate, economic, technical and energy efficiency point of view, its production must be carried out close to the places where it is consumed, by means of electrolyzers powered by renewable energy.** Therefore, **infrastructure projects for long-distance hydrogen transport, such as H2Med, are totally unnecessary.** The use of green hydrogen should be reserved for cases in which it is unfeasible to use other types of renewable energy, and especially to replace the use of hydrogen as a raw material in certain hard-to-abate industrial processes (such as for steel), as well as in sectors that are impossible to electrify such as, shipping or aviation, with the following caveats: 1) that a detailed analysis of the real need of hydrogen in the different sectors and clear evidence of sustainable and efficient uses should be transparently carried out and made publicly available; 2) that it should not be used for processes or sectors that can be electrified. It can also be used to add flexibility to the system i.e. for storage - for some kinds of maritime and air transport - or energy demand response purposes.

Regarding the H2Med project, it is important to underline the following:

1. **Its application to the PCI list has been submitted without the promoters having previously carried out a detailed study on the prospects for future production and demand of green hydrogen.** It is not reasonable to expand the use of green hydrogen with the construction of new infrastructures without having carried out a previous analysis of the energy context in which we find ourselves and on future forecasts.
2. Regarding **H2Med-BarMar, the promoters did not even have information on its technical and economic feasibility**, since the project belongs to a category for which there is not even a guide of technical recommendations for its design to ensure the efficiency and safety of the infrastructure, as indicated by the International Energy Agency³.
3. H2Med would involve the development of a backbone network with new infrastructure for exclusive hydrogen transport, such as the **Spanish hydrogen backbone project**. However, to date, **the need to develop a network for the**

1 EDF, *Emissions of hydrogen could undermine its climate benefits*, 2022.

<https://www.edf.org/media/study-emissions-hydrogen-could-undermine-its-climate-benefits-warming-effects-are-two-six>

2 Nicola Warwick, Paul Griffiths, James Keeble, Alexander Archibald, John Pyle, University of Cambridge and NCAS and Keith Shine, University of Reading; *Atmospheric implications of increased hydrogen use*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1067144/atmospheric-implications-of-increased-hydrogen-use.pdf

3 Up to date, there are no standards for offshore hydrogen pipelines, unlike the ASME B31.12 for onshore ones. Source: IEA, *Global Hydrogen Review 2022*, <https://www.iea.org/reports/global-hydrogen-review-2022>, p.110.

exclusive transport of hydrogen over medium and long distances has not been demonstrated.

4. According to the industry, European hydrogen transport infrastructure, such as H2Med, will imply retrofitting gas pipelines⁴. **The technologies to adapt fossil gas pipelines for hydrogen transport are not currently developed at a large scale, nor are they as easy to implement as the industry suggests.** In fact, because of the physicochemical properties of hydrogen, it implies a **higher risk of leaks, with the consequent severe impacts on the climate, as hydrogen is an indirect greenhouse gas.** In fact, beyond a certain critical threshold, using hydrogen would have little advantage over using fossil fuels.
5. If H2Med is finally included in the PCI list, **it could benefit from the less stringent environmental controls and be exempted from comprehensive environmental impact assessments.** The latter becomes especially relevant if we consider that **H2Med-BarMar will cross the Gulf of Lion, one of the ecosystems with the highest biodiversity index in the Mediterranean⁵.**
6. The **public funding** it would receive for being declared a PCI **would divert important economic resources that would be better spent on more urgent measures that have already been proven to work,** such as resource use reduction, electrification, the commitment to renewable projects with citizen participation, self-consumption, energy communities and improvements in household energy efficiency.

You have a chance, at the upcoming meeting, to stop this project from being included in the PCI list. **We call on you to stand up against this project due to multiple severe concerns about its real need and usefulness, and against other large scale hydrogen transport projects proposed for the PCI/PMI list which are facing a similar lack of analysis and face similar problems.** We call on you to advocate for an energy transition that takes into account the use of green hydrogen within proper planning procedures that clearly take into account the prospects for future production and demand of green hydrogen, define where to produce it and which uses are viable and should be given priority.

Signatories (in alphabetical order)

Policymakers:

Júlia Boada, diputada de En Comú Podem (GP Plurinacional Sumar)

David Cormand, Member of the European Parliament (Greens/EFA).

Rosa D'Amato, Membro del Parlamento Europeo (Greens/EFA).

4 European Hydrogen Backbone, *Estimated Investment Cost*, [Estimated Investment & Cost | EHB European Hydrogen Backbone](#)

5 MAGRAMA, Fundación Biodiversidad; *Sistema de Cañones Submarinos Occidentales del Golfo de León, Áreas de Estudio del Proyecto LIFE+ INDEMARES*, p. 7.
https://www.indemares.es/sites/default/files/sistema_de_canones_submarinos_occidentales_del_golfo_de_leon.pdf

Francisco Guerreiro, Member of the European Parliament (Portuguese independent - Greens/EFA).

Manu Pineda. Member of the European Parliament (IU/PCE - The LEFT).

Sira Rego. Member of the European Parliament (IU - The LEFT), Federal spokesperson for IU.

Michèle Rivasi, Member of the European Parliament (Greens/EFA).

Caroline Roose, Member of the European Parliament (Greens/EFA)

Marie Toussaint, Member of the European Parliament (Greens/EFA).

Miguel Urbán Crespo. Member of the European Parliament (Anticapitalistas - The LEFT)

Organizations:

Amigos de la Tierra

ARAYARA.org Europe

ASEED Europe

Association PIERREDOMACHAL (Vallée du RHÔNE, France)

Bond Beter Leefmilieu

Campagna Nazionale Per il Clima Fuori dal Fossile

Climáximo

Colectivo Burbuja

Comité Ciudadán de Emerxencia -CCE- (Ría de Ferrol)

COESUS - Coalition

Corporate Europe Observatory

Counter Balance

ECODES

Ecologistas en Acción

ECO-UNION

Emergenzaclimatica.it

End Fossil BCN

Environmental Association "Za Zemiata" - Friends of the Earth Bulgaria

European Environmental Bureau (EEB)

Food & Water Action Europe

Forum Ambientalista

Friends of the Earth Malta

Friends of the Earth Europe

Fridays for Future España - Juventud por el Clima

Fundación Renovables

Futuro en Común

Gastivists collective

Global Witness

Greenpeace

Ingeniería Sin Fronteras

Instituto Internacional de Derecho y Medio Ambiente (IIDMA)

Les Amis de la Terre France

Movimento No TAP/SNAM della Provincia di Brindisi

Observatorio de la Deuda en la Globalización (ODG)

Plataforma por un Nuevo Modelo Energético

ReCommon

Red Gas No Es Solución

Rete Norigass No GNL (Italy)

Association Workshop for All Beings

Notre Affaire A Tous

Stowarzyszenie Ekologiczne EKO-UNIA, Poland

WeSmellGas

Xarxa per la sobirania energètica (Xse)

ZERO - Associação Sistema Terrestre Sustentável, Portugal

Political Parties:

Anticapitalistas

Izquierda Unida

Verdes Equo
