

Minister Amélie de Montchalin  
Ministers of Transport of EU Member States  
CC: Executive Vice President Timmermans, Commissioner Simson, Commissioner Vălean, MEP Gade

Brussels, 30<sup>th</sup> May 2022

**Subject:** Open Letter raising concern on the exclusion of renewable hydrogen from the scope of ReFuelEU Aviation

Dear Minister de Montchalin,

The prospective hydrogen industry is writing to you to share its concern regarding the discussions on the fuel types included in the scope of the so-called ReFuelEU Aviation proposal.

**In the EU in 2017, direct emissions from aviation accounted for 3.8% of total GHG emissions<sup>1</sup>.** The aviation sector is responsible for 13.9% of the total emissions from transport, making it the second largest source of transport GHG emissions after road transport. To achieve climate neutrality, the European Green Deal sets out the need to reduce transport emissions by 90% by 2050 (compared to 1990-levels). **The aviation sector must be at the forefront of this transition.**

To ensure this happens, **we call for the inclusion of renewable hydrogen among the list of fuels covered by the scope of ReFuelEU Aviation.**

**Swift action is necessary today** for three main reasons:

- Keep up with market developments in all route segments<sup>2</sup>
- Encourage early investments into research and development by providing legal certainty, thus promoting a faster uptake
- Be consistent with decarbonisation goals set out in the Green Deal

Hydrogen-powered aircraft might operate one third of all passenger aviation traffic; their CO<sub>2</sub>e mitigation potential is maximised when fuelled by renewable hydrogen, whose costs are rapidly falling<sup>3</sup>. However, **leaving discussions on its inclusion to the review of the text will waste precious time** and delay the necessary ramp up and R&I for this technology: manufacturers and innovators are already developing hydrogen propulsion technologies and aircraft concepts, with the earliest applications planned for 2024 and new aircraft entering service in the following decade. Foundations for necessary supply and infrastructure at airports need to be laid today due to the long development cycles.

**The decarbonisation of aviation should indeed be supported with multiple means:** for instance, a 2025 sub target for synthetic fuels would provide further encouragement to the industry but, overall, **financial support is what is needed the most.** It should be ensured that a portion of the **money generated within the industry** (e.g., penalties for non-compliance with ReFuelEU rules, revenues generated by the trading of allowances under the ETS Aviation scheme) **is channelled back to the sector and used to finance the development of zero emission aviation and, *inter alia*, the hydrogen industry chain,** from the ramp up of necessary enabling technologies to the creation of hydrogen hubs at airports.

**The decarbonising aviation is a collective challenge that needs strong support from EU institutions; let us work together to make it a success.**



Hydrogen  
Europe

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<sup>1</sup> European Commission, *Reducing emissions from aviation* [https://ec.europa.eu/clima/eu-action/transport-emissions/reducing-emissions-aviation\\_en](https://ec.europa.eu/clima/eu-action/transport-emissions/reducing-emissions-aviation_en)

<sup>2</sup> Front runners in the sector will operate the first hydrogen powered commercial flight in 2024; Industry leaders such as Airbus aim at having hydrogen aircraft ready by 2035.

<sup>3</sup> Performance analysis of evolutionary hydrogen-powered aircraft, ICCT, 2022  
<https://theicct.org/publication/aviation-global-evo-hydrogen-aircraft-jan22/>