



Hydrogen
Europe

Triologue recommendations

Revision of the Trans-European Network for Transport
Regulation (TEN-T)

2nd June 2023

Ensure a Trans-European Network of Transport fit for alternative and renewable fuels deployment.

Key messages:

- The revision of the TEN-T guidelines should be made in accordance with Alternative Fuels Infrastructure Regulation (AFIR) and TEN-E Regulations, to recognize the close interlink between energy and transport infrastructures for sustainable and zero emission mobility of the future.
- Ports and airports should receive more recognition for their crucial role in transport energy transition via imports and handling of alternative fuels. Therefore, Article 24 of TEN-T should recognise ports on the network based on their contribution and diversification of EU energy supply towards renewables; as well as maritime corridors to ensure funding access for import/export terminals.
- Hydrogen Europe calls for a recognition of the potential of alternative fuels in railways where electrification is not feasible: derogations set in article 15 should be made more flexible to allow for a faster implementation of hydrogen-based solutions in rail transport.
- A close monitoring of the development of alternative fuels infrastructures on the TEN-T should be ensured by aligning national policies on the TEN-T objectives and channelling EU funds where most needed. Hydrogen Europe proposes to appoint a European Coordinator for alternative fuels deployment, ensuring cross-border cooperations.

Context:

Hydrogen Europe welcomes the revision of the guidelines on the development of the Trans-European Network (TEN-T). The revision is necessary to achieve the European Green Deal's and Smart and Sustainable Mobility Strategy's ambitious climate targets - a 90% reduction in transport emissions by 2050 - and to ensure a swift transition to sustainable mobility. The completion of the core, extended core and comprehensive networks is crucial for the connectivity of all territories in the EU, especially in giving equal access to decarbonized means of transport and alternative fuels solutions. We thus agree with the general ambition of the revision which is not to undertake major changes on the maps of the networks, but rather ensuring completion of the TEN-T network in due time and putting in practice the objective of sustainability of transports.

Hydrogen Europe followed closely the debates taking place within the Council of the European Union until the adoption of its general approach on the 5th of December 2022 – as well as discussion and amendments leading to the adoption of the report from the European Parliament on the 13th of April 2023 in TRAN committee, confirmed in plenary thereafter.

The two positions of the co-legislators vary greatly. In this context, Hydrogen Europe intends to provide its guidelines for the upcoming trilogues, which will hopefully conclude in the next few months under the Spanish Presidency.

1. Ensure alignment with flanking legislation:

Hydrogen Europe underlines that it is of the utmost importance that the revised TEN-T guidelines act in unison with flanking legislation: TEN-E, AFIR, FuelEU Maritime and ReFuelEU Aviation. A holistic approach to transport legislation is essential to guarantee security of hydrogen supply in all transport modes across the continent, and thus a fast and seamless transition to zero-emission mobility. In this sense, hydrogen-powered vehicles should be regarded as the natural complement to battery electric vehicles and should therefore be granted more attention within the TEN-T guidelines.

TEN-T and AFIR

It is crucial that the timelines of TEN-T and AFIR are aligned to make sure deployment of the latter is done in time. A rapid and extensive deployment of hydrogen refueling stations with a sufficient minimum daily capacity is key to give consumers and fleet operators certainty in the transition to zero emission vehicles. **Therefore, we would like to see the network ready as soon as possible to make sure that the deployment of hydrogen refueling stations happens according to agreed timelines.** In this respect, special attention should be given to **European Transport Corridors**.

On **urban nodes**, the enlarged list of 424 eligible locations is a welcome development: zero-emission heavy and light-duty vehicles, public transport, rail transport and taxi fleets have an important role to play in reducing emissions in European cities. In achieving these objectives, we welcome the introduction of mandatory Sustainable Urban Mobility Plans (SUMP) for all urban nodes by 2025, promoting zero emission mobility.

Hydrogen Europe welcomes the extension of the definition by the European Parliament of '*functional urban areas*' for urban nodes, including thus the commuting zones and allowing better sustainable mobility planning at a local scale. Hydrogen Europe is also pleased to see the clear ambition of the Parliament for more refuelling stations where they are needed, with the requirement in Article 37 to ensure one HRS for heavy-duty vehicles to be deployed in each multimodal freight terminal by 2030. This provision should however have been included in AFIR provisions for more coherence within the legal framework.

Overall, **there should be a clearer link with AFIR provisions:** general priorities for the core, extended core and comprehensive network should explicitly stipulate that deployment be made in accordance with rules set out within the AFIR text, notably in art. 6.

On this, Hydrogen Europe supports the European Parliament position adding mentions of hydrogen refueling stations next to electric recharging stations requirements for road transport, putting both technologies on equal footing for development along the TEN-T. The EP position also increases the legal references to the recently adopted AFIR with TEN-T, ensuring a clear link between the timeline for compliance of the two regulations.

TEN-T and TEN-E

Thinking outside of the silo approach, we **recognize that energy and transport infrastructures are key enablers for decarbonization of EU industry and transport sector.** The recently revised TEN-E Regulation lays down updated rules to link the energy infrastructure of EU countries. The new Regulation will contribute to the EU emissions reduction objectives by promoting the integration of renewables and new clean energy technologies into the energy system, connecting isolated Regions, and strengthening cross-border connections.

Therefore, to ensure optimization of supply of alternative fuels and a fast transition to green mobility and sustainable energy, **it is important that TEN-T guidelines are aligned with TEN-E rules**. This would be the logical way to develop both networks across Europe, linking both infrastructures to make sustainable alternative fuels available for all users along the TEN-T.

Hydrogen Europe welcomes the addition in recitals by the European Parliament of requests for increased synergies between TEN-T and TEN-E and in the general objectives of the TEN-T. Such links should be systematic in the general provisions chapter, to ensure any revision of each regulation should be made while considering the other one.

To promote hydrogen mobility and ensure hydrogen refueling stations across the network can be easily and quickly refilled, we also advocate for alignment between the TEN-T network and the European Hydrogen Backbone initiative.

2. Make TEN-T ports and airports hydrogen hubs:

While we welcome the update of requirements to provide alternative fuels for inland and maritime ports as well as airports, we believe the proposal could go further in transforming TEN-T infrastructures into real hydrogen hubs.

Ports should be redesigned to become zero emission multimodal terminals with more synergies between energy and transport port infrastructures (cf TEN-E), and ideally their own hydrogen production facility to decarbonize daily logistics operations and guarantee the feasibility of zero emission multimodal transport operations. Unfortunately, this is not adequately reflected in the current proposal.

Though we believe it is unnecessary to make major changes to the TEN-T maps, **an update on the conditions to be met by maritime ports to be added on the comprehensive network in the name of energy transition needs would make sense in article 24.4**, as proposed by the Council in its general approach : it opens access to the network *if a port doesn't reach the 1 million tons cargo volume criteria to be identified on the network but its contribution to the diversification of EU energy supplies and to the acceleration of the roll-out of renewable energies is one of the main activities of the port*. Since the RePower EU communication sets the objective of 10Mt of imports of hydrogen for 2030, such an amendment constitutes a clear incentive for ports to invest in renewable energy, hydrogen storage and refueling station facilities, to become energy hubs and gateways for imports of hydrogen into the continent. It is important to note that through being added onto the TEN-T networks, these ports would benefit from the CEF Transports program and AFIF instrument, helping them finance the investment needed.

Hydrogen Europe takes note of the position of the European Parliament which opens the possibility for ports to be identified on the network regarding their '*geostrategic importance for the Union*' (art 24 and 56). However, clear criteria including the contribution to the energy transition, production and imports of renewable energy including hydrogen should be explicitly mentioned as part of the assessment for geostrategic importance.

The recognition of ports as energy transport hubs goes hand in hand with the **recognition of maritime corridors**. Several maritime routes are being identified to transport renewable hydrogen and derivatives produced in Southern Europe to energy hubs in Northern Europe. These projects have huge decarbonisation potential in the hard to decarbonise mobility sectors (heavy goods road transport, maritime and first movers in aviation) and ports can become direct users of hydrogen and derivatives

imported or produced within their vicinity. Used or converted on site, it can become fuel for ships and decarbonize the maritime as well as logistics sector. The lack of explicit recognition of maritime corridors in Article 24 (and in particular import/export terminals) prevents these infrastructures to be supported via CEF funds, despite their clear role in achieving the sustainability goal of the TEN-T.

Similarly, there should be more ambition on **TEN-T airports**: measures should facilitate their transformation to multimodal hydrogen hubs. On site production of green hydrogen should be facilitated, and delivery of SAF should be done exploiting TEN-T and TEN-E networks. This should enable decarbonization of ground handling operations and encourage the uptake of zero emission aircraft, in line with ReFuelEU Aviation targets.

Ports and airports can serve as experimentation and demonstration places through combined hydrogen and derivatives refueling stations available for all modes of transport: ground vehicles, city buses connection, ships/airplanes, trucks etc. To ensure a real deployment of alternative fuels mobility throughout the continent, these hubs should be connected to the wider network and linked to urban nodes and mainland hubs. Alternative fuels such as hydrogen could then be distributed at a larger scale and at a lower level of injection, for smaller users as well.

3. Give more space to alternative fuels in the rail sector:

As it is the case for the other transport modes, the TEN-T regulation should better consider the potential of hydrogen to further decarbonize the rail sector as a complement of overhead line electrification.

Art. 14 extends the list of rail infrastructure components including rail services facilities, rail access routes and last mile connections. **However, for some of these segments of the network it is sometimes not economically relevant to make direct electrification compulsory. This represents a great window of opportunity for zero emission hydrogen-powered trains, which should be better recognized in the text.** We welcome the proposal of the European Parliament to include infrastructure related to alternative fuels facilities in the infrastructure components for railways, thus recognizing the potential of these technologies for rail.

Overall, **a more flexible derogation process should also be considered for the full electrification requirement of the comprehensive network set out in Art. 15, when this is not feasible.** Hydrogen-powered trains should be recognized as a real alternative to diesel trains.

4. More monitoring for alternative fuels and hydrogen deployment in the TEN-T governance

Finally, we welcome the proposal for the Commission's and European Corridors Coordinators added power to **address delays in implementation in the TEN-T completion** and ensure an equal and balanced progress of the infrastructure. A closer link with national infrastructure planification should be foreseen, and appropriate sanctions could be envisioned if Member States fail in the completion of the TEN-T network by the set dates. Indeed, divergence between European agreed objectives and national infrastructure and investment programming laws are one of the main obstacles to the regulation's implementation and effectiveness, as pointed out in the Commission's Impact Assessment.

Hydrogen Europe also welcomes the European Parliament's position **channeling EU funds where they are the most needed**: with completion of the core network for investments a clear priority, and less priority put on national projects not aligned with EU transport policy. Since new priorities arose on EU transport policy recently, there are more and more requests for funds and their use must have a strong European added value, contributing to reaching 2030 targets for the network. We call on co-legislators

to keep the AFIF running until 2027, to ensure the fulfillment of the target for alternative fuel infrastructures on the core network, and most importantly, for a geographical balance and equal access to sustainable mobility across Europe.

We believe it would be beneficial to **add alternative fuel deployment as a horizontal priority** for the implementation of the TEN-T network, along with ERTMS and European Maritime Space (art. 50). Indeed, given the high stakes of decarbonizing the transport sector according to the Green Deal strategy, the deployment of renewable fuel deserves its place among the priorities of the TEN-T, across all corridors.

This can lead to the appointment of a **European Coordinator for Alternative Fuel Deployment**, who can ensure that refueling stations are developed in a timely manner, ensuring geographical balance and consultation of all parts. Such a position constitutes an undeniable asset in strengthening the synergies between the AFIR file and the TEN-T regulation, which we strongly advocate for.

Hydrogen Europe will work with co-legislators in progressing the revision of the TEN-T regulation, pushing for its priorities stated in this document whilst advocating to conclude the file by the end of the year 2023, to give Member States time to build or renovate their core infrastructure with the standards set in TEN-T by 2030.

HYDROGEN EUROPE
Avenue Marnix 23
1000, Brussels / Belgium

secretariat@hydrogeneurope.eu
www.hydrogeneurope.eu