



POSITION PAPER

**Bellona's Position on RFNBO
Rules**



Introduction

This position summarises Bellona Europa's position on RFNBO rules (Delegated Regulation (EU) 2023/1184), taking into account the recent push from certain industrial stakeholders to weaken its safeguards under the premise that they would be substantially delaying or making hydrogen production unaffordable.

1) Hydrogen is a means to an end: decarbonisation

Bellona's longstanding position is that hydrogen should be used strategically as a decarbonisation tool, primarily in hard-to-abate sectors, and not as a universal substitute for direct electrification or fossil gas use. This assessment is grounded in the reality of our power system: given the capacity mix present in the EU electricity market, running electrolysers would increase demand from dispatchable fossil generation in practice unless strict production criteria apply. We consider that the evaluation and any amendment of existing RFNBO rules must be grounded on their objective: decarbonisation.

2) Reopening Delegated Regulation (EU) 2023/1184 at this stage is premature and dangerous

It would damage legal certainty and planning security. The revision of the RFNBO Delegated Act is only due in July 2028. Reopening basic aspects of this rule at this point would harm predictability for investors and national policymakers who are only beginning to implement the framework. This concern aligns with the general EU law principle of legal certainty, which aims to ensure that legal situations and relationships governed by EU law remain foreseeable.

It would punish early adopters. Projects that have been designed around the current criteria would be disadvantaged relative to later projects if integrity requirements are relaxed.

It would overlook where the main cost and delivery constraints arise. The most binding constraints for many projects relate to the fundamentals of the energy system (renewables and grid build-out, connection lead times and charges), rather than the existence of integrity criteria such as additionality and temporal and geographical correlation.

3) RFNBO rules are not “bureaucracy”, but guardrails for environmental integrity

The additionality and correlation requirements should not be treated as administrative formalities. They are the essential safeguards that prevent outcomes where RFNBO production (i) increases fossil generation at the margin, (ii) raises overall grid emissions, or (iii) diverts renewable electricity from direct electrification. These safeguards are part of the rationale for establishing a Union methodology on electricity used for RFNBOs to be considered fully renewable.

4) Prioritising hydrogen key uses improves climate value and manages scarcity

Given constrained renewable electricity supply and infrastructure bottlenecks, prioritising RFNBO use to “no-regret” applications helps maximise abatement per unit of renewable electricity and reduces pressure on scarce resources. In practical terms, this implies focusing hydrogen use where direct electrification is not feasible and where hydrogen delivers high abatement value (e.g., certain industrial feedstocks and processes, and specific transport segments where alternatives are limited).

5) Additionality

Additionality requires RFNBO production to rely on renewable electricity from newly built capacity, rather than reallocating existing renewable generation. This is a key safeguard to reduce the risk of electrolyser demand competing with clean electricity needed for direct electrification and to avoid increasing fossil generation indirectly. If additionality requirements are weakened, the risk increases that renewable hydrogen claims become largely “paper-based”, with greater scope for greenwashing, higher system emissions, additional pressure on electricity prices in constrained systems, and reduced public acceptance of public support for hydrogen.

6) Temporal correlation

Temporal correlation links the timing of renewable electricity generation to the timing of electrolyser consumption, to prevent situations where hydrogen is produced in fossil-heavy hours while claiming renewable generation in different periods. The Commission has publicly framed the delegated acts as rules to ensure renewable hydrogen is genuinely renewable, including through time correlation that becomes more stringent over time. This safeguard is central to ensuring RFNBO production reduces real-world emissions and supports system integration (incentivising flexible operation aligned with renewable availability). If temporal correlation is postponed, we risk higher emissions and higher consumer costs.

7) Geographical correlation

Geographical correlation requires that the renewable electricity claimed for RFNBO production is sourced within a geographic boundary that is meaningful for the power system (i.e., to avoid remote claims that are actually not deliverable based on the grid topology). This is part of the RFNBO Delegated Act's integrity architecture for ensuring RFNBO electricity is genuinely renewable in system terms. This safeguard limits opportunities for accounting arbitrage and supports credible links between electrolyser consumption and the electricity system actually supplying it. Should geographical correlation be watered down, there would be greater scope for low-integrity outcomes, higher congestion and balancing costs, and reduced credibility of renewable hydrogen claims, with knock-on impacts for public support and market trust.

8) Gradual policy interventions are risk defeating the purpose of the RFNBO Delegated Act

We do not consider that "gradual" integrity-weakening interventions are warranted at this stage. The RFNBO Delegated Act is recent, projects have long development timelines, and the Commission has already indicated a review point in July 2028.

In any case, any future adjustments should be evidence-based and must prioritise climate contribution and system integrity over hydrogen deployment speed for its own sake, consistent with the RFNBO Delegated Act's stated rationale and the Union's wider climate and energy objectives. In particular, the following intervention types raise material risks:

- Delaying cutoff years for additionality or for stricter temporal correlation would extend the period during which production can be less tightly aligned with new renewable generation and clean production hours, increasing the likelihood of higher emissions and having an additional impact on electricity prices.
- Relaxing the additionality criterion (including by broadening eligibility to non-additional renewable supply) would increase the risk of diverting renewable electricity from direct electrification and increase of greenwashing.
- Reliance on less conservative thresholds for grid metrics (average CO2 intensity and renewable share) would risk masking fossil-intensive hours and weakening incentives for flexible, renewables-friendly operation of electrolysers.



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Bellona Europa is an independent, non-profit organisation that meets environmental and climate challenges head-on. We are result-oriented and have a comprehensive and cross-sectoral approach to assess the economics, climate impacts and technical feasibility of necessary climate solutions. To do this, we work with civil society, academia, governments and polluting industries.