



Berlin, 21 September 2026

Joint Letter

**Urgent need to advance and conclude
the targeted review of Delegated
Regulation (EU) 2023/1184**

We, the signing associations representing companies across the European energy, hydrogen and industrial value chains, urge the European Commission to advance without further delay the announced targeted review of Delegated Regulation (EU) 2023/1184 on the production criteria for renewable fuels of non-biological origin (RFNBOs).

We welcomed the Commission's announcement in the AccelerateEU Communication to bring forward the review of the production criteria for renewable hydrogen in light of the slower-than-expected market ramp-up. However, the continued postponement of the review and the absence of a clear and reliable timetable are increasingly becoming a source of uncertainty in themselves.

Companies across the hydrogen value chain are taking investment decisions today on projects with long development periods and investment horizons extending well beyond 2030. As long as it remains uncertain when and how the RFNBO production criteria will be adjusted, projects cannot reliably assess their business cases, financing conditions or future compliance costs.

The substantive issues are well known. Industry associations, companies and Member States have provided extensive evidence and concrete proposals over the past years. The discussion on the key barriers created by the current electricity sourcing criteria – including additionality and temporal correlation – is mature. Industry organisations have repeatedly submitted specific proposals for targeted adjustments that would reduce unnecessary costs and barriers while maintaining the climate integrity of renewable hydrogen production. In particular, we call for postponing the full application of the additionality requirements until 2035, maintaining monthly rather than introducing hourly temporal correlation or at least postponing the hourly temporal correlation until 2035, and lowering the threshold for the exemption applying to bidding zones with a high share of renewable electricity from 90% to 80%.

What is needed now is not another prolonged period of regulatory uncertainty, but a focused, targeted and efficient decision-making process.

We therefore call on the European Commission to publish its proposal for the targeted review without further delay, establish a clear and reliable timetable this September for the remaining process, and conclude the revision as swiftly as possible, with the firm objective of submitting the final proposal before end of the year.

We stand ready to support the European Commission with our members' practical experience, project data and technical expertise and to contribute constructively to a swift conclusion of the review.