

Warsaw, 26 October 2026

Ursula von der Leyen
President of the European Commission

Teresa Ribera
Executive Vice-President
for a Clean, Just and Competitive Transition
European Commission

Dan Jørgensen
Commissioner for Energy and Housing
European Commission

**EUROPEAN INDUSTRY MUST SURVIVE TO MODERNISE - A CALL FOR A COMPETITIVE
AND TECHNOLOGY NEUTRAL EU HYDROGEN FRAMEWORK**

Need for suspension on the 2030 industrial RFNBO target and reassessment of the 2035 target

Dear President von der Leyen!

Dear Executive Vice-President Ribera!

Dear Commissioner Jørgensen!

Europe's industrial base is fundamental to its competitiveness, resilience and capacity to deliver the transition. **EU manufacturing employs more than 30 million people and generates around EUR 2.5 trillion in value added, making it the largest sector of the EU business economy by both employment and value added.** Preserving its capacity to produce, invest and modernise in Europe is therefore essential to the Union's long-term transformation.

We, the undersigned European industry associations and companies, recognise the need for industrial decarbonisation in line with the Union's climate objectives and acknowledge the role renewable hydrogen can play as one of the pathways in that transition. **The transition can only succeed if Europe preserves the industrial capacity that must deliver it.**

The Survive, Modernise, Accelerate logic reflected in the Critical Chemicals Alliance process captures a broader industrial reality: industrial transformation requires a viable operating and investment base. This principle should guide the post-2030 framework for RFNBOs, which must be technically achievable, economically viable and aligned with the development of enabling infrastructure.

For industry, RED III requires Member States to ensure that RFNBOs account for at least 42% of hydrogen used by 2030 and 60% by 2035. Yet the market and the infrastructure needed to deliver this trajectory are still developing. The availability of competitively priced renewable electricity, electrolysis capacity, grid connections, hydrogen transport and storage infrastructure, certified supply and bankable long-term contracts remains uneven across Europe. **The current RFNBO**

trajectory should therefore be reassessed against actual market development, infrastructure availability and the pace at which industrial transformation can realistically take place.

Investment certainty is needed across the entire value chain. The future RFNBO trajectory should be indicative and aligned with the actual availability of renewable electricity, hydrogen production capacity, transport and storage infrastructure and competitive supply. Where obligations run ahead of these enabling conditions, they increase cost and compliance risks for European industrial production.

The same obligation can also have very different effects across the Single Market. Member States and industrial regions do not have equal access to competitively priced low-carbon electricity, hydrogen infrastructure, grids or financing. A uniform percentage can translate into very different transition burdens across the Union. **EU policy should avoid turning structural differences in energy systems and infrastructure into new competitive asymmetries between European production sites.**

This is also a question of resilience. Europe should not decarbonise by weakening or losing strategic production capacity and replacing it with new import dependencies. The RFNBO framework should support the modernisation of European industry, not force substitution at a pace that runs ahead of the infrastructure, supply and market conditions needed to make that transformation viable. A resilient transition must preserve the capacity, skills, value chains and investment base that Europe will need throughout the transformation.

We therefore call on the European Commission, in the preparation of the post-2030 renewable energy framework, to:

- propose the necessary legislative changes to **suspend the binding 2030 industrial RFNBO target and reassess the 2035 target**, replacing the current rigid trajectory with an indicative and reviewable EU-level trajectory aligned with actual market development and infrastructure readiness;
- ensure that the **post-2030 framework is workable across the Union, recognising different national and regional starting points** and avoiding a situation in which differences in access to renewable electricity, grids, hydrogen infrastructure and competitive supply translate into new competitive asymmetries within the Single Market;
- **embed technology neutrality** more firmly in the industrial decarbonisation framework, allowing renewable and low-carbon hydrogen pathways to contribute according to their verified greenhouse-gas performance, cost-effectiveness and practical availability, rather than prescribing a single production route;
- review RFNBO qualification and production rules so that additionality, temporal and geographical correlation requirements **remain proportionate to market maturity and infrastructure development** and do not unnecessarily constrain supply or increase costs.

Europe's transition requires a regulatory framework that delivers real emissions reductions, investment and industrial transformation across the Union. Preserving viable industrial capacity is a prerequisite for continued modernisation and decarbonisation. The post-2030 framework should therefore create the conditions for industrial transformation while safeguarding the production base, investment capacity and resilience needed to sustain Europe's long-term transition.

Signatories:

