

Council of the European Union General Secretariat

REDACTED DOCUMENT ACCESSIBLE TO THE PUBLIC (04.02.2024). ONLY MARGINAL PERSONAL DATA HAVE BEEN REDACTED. Brussels, 12 April 2021

WK 4854/2021 INIT

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Energy
Subject:	LU comments on Art. 2-6 and Annex III-IV of the TEN-E Regulation (ST 7280/21)

Delegations will find in the annex the LU comments on Art. 2-6 and Annex III-IV of the TEN-E Regulation (ST 7280/21).

Revised proposal regarding articles 2-6, annex III and IV

Comments from Luxembourg

12 April 2021

We would like to thank the Presidency for the revised compromise proposal.

In article 2, we welcome some of the clarifications brought forward. However, we are not in a position to support the new definitions related to the transitional period and to blending. We would like to add a definition related to "energy efficiency first".

In article 4 and the related annex, we believe that the proposal still falls short of the necessary reinforcement of sustainability criteria to assess candidate projects.

Our detailed comments can be found hereafter.

Article 2

Definitions

- (4) 'project of common interest' means a project [] likely to implement the energy infrastructure priority corridors and areas set out in Annex I and which is part of the Union list of projects of common interest referred to in Article 3 <u>and/or projects set out in</u> <u>Annex II developed in disadvantaged, less connected, peripheral, outermost or</u> <u>isolated regions, such as islands, island territories and outermost regions where there</u> <u>is no direct link with the energy system of the Union or</u> where cross-border effects are not possible, in each cases with a significant positive impact on the EU energy and climate targets according to the criteria established in this regulation;
- (9) 'smart gas grid' means a gas network that makes use of innovative digital solutions to integrate in a cost efficient manner a plurality of low-carbon and renewable gas sources in accordance with consumers' needs and gas quality requirements in order to reduce the carbon footprint of the related gas consumption, enable an increased share of renewable and low-carbon gases, and create links with other energy carriers and sectors;
- (10) "repurposed/converted infrastructure" means physical upgrade of existing natural gas infrastructure for the exclusive use of hydrogen-or of a mixture of methane and biomethane with hydrogen at a pre-defined level.

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Commented [1]: We do not support the word "likely" that weakens the value of the priority corridors and the eligibility criteria of projects.

Commented :: As a reminder, we cannot support this category (definition, scope, eligibility criteria, selection criteria) until more clarifications are brought to exclude the possibility to finance infrastructure that will be predominantly used for the transport and distribution of fossil gas.

Commented :: We do not see the need of such a definition. However, if this definition was to be added, it should make it clear that by "repurposing" we intend the reconversion of the existing gas grid towards infrastructure that will be 100% dedicated to hydrogen.

- (11) "transitional period" means a period of time, which shall start on the date of entry into force of this Regulation and end on 31 December 2025, allocated for a progressive substitution of carbon based fuels to take place where adaptations and changes to upgrade physical infrastructures and construction of new infrastructures in order to ensure the shift from a fossil fuel mix based system into a fully 100% renewable source based system.
- (20) 'energy efficiency first' means taking utmost account in energy planning, and in policy and investment decisions, of alternative cost-efficient energy efficiency measures to make energy demand and energy supply more efficient, in particular by means of cost-effective end-use energy savings, demand response initiatives and more efficient conversion, transmission and distribution of energy, whilst still achieving the objectives of those decisions:

Article 4

Criteria for projects of common interest and projects of mutual interest

1. Projects of common interest shall meet the following general criteria:

(a) the project is necessary for at least one of the energy infrastructure priority corridors and areas;

(b) the potential overall benefits of the project, assessed according to the respective specific criteria in paragraph 3, outweigh its costs, including in the longer term;

(ba) the project fulfils the principle of "do no significant harm";

(c) the project meets any of the following criteria:

 (i) involves at least two Member States by directly crossing the border of two or more Member States;

(ii) is located on the territory of one Member State and has a significant cross-border impact as set out in point (1) of Annex IV.

(iii) is located in islands non sufficiently connected to the trans-European energy networks that are small connected <u>systems</u> or isolated systems according to Directive 2019/944 and contribute significantly to the decarbonisation objectives of the island energy system and those of Union, and to sustainability in the territory in which it is located.

2. Projects of mutual interest shall meet the following general criteria:

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Commented :: We cannot support the establishment of a transitional period. As already stated, a transitional period de facto already exists between now and the moment the regulation will enter into force for the establishment of the 6th PCI list.

Commented [11]: We propose the addition of this definition coming from article 2 of regulation 2018/1999 (Governance Regulation).

Commented : Justification: The DNSH principle is an overriding principle that should apply to all project as a mandatory criterion and not simply be a reporting obligation as provided for by Article 5 (this justification also applies to PMIs – see below).

- (a) the project contributes significantly to the decarbonisation objectives of the Union and those of the third country and to sustainability, including through the integration of renewable energy into the grid and the transmission and distribution of renewable generation to major consumption centres and storage sites, and;
- (b) the potential overall benefits of the project, assessed in accordance with the respective specific criteria in paragraph 3 at the European Union level, outweigh its costs, including in the longer term;
- (c) the project is located on the territory of at least one Member State and on the territory of at least one third country and has a significant cross-border impact as set out in point (2) of Annex IV;
- (d) for the part located on Union territory, the project is in line with Directives 2009/73/EC and (EU) 2019/944 where it falls within the infrastructure categories described in points (1) and (3) of Annex II;
- (e) the third country or countries involved have a high level of regulatory alignment or convergence to support the overall policy objectives of the Union, in particular to ensure:
 - i) a well-functioning internal energy market;
 - ii) security of energy supplies based on cooperation and solidarity;
 - iii) an energy system, including production, transmission and distribution, on a trajectory towards decarbonisation in line with the Paris Agreement and the Union's climate objectives; and, in particular, avoiding carbon leakage;

iv) fulfilling EU recognized safety levels legislation.

v) energy exports to the EU does not hinder the capacity of the third country to phaseout high-carbon assets to satisfy its domestic energy consumption,

the third country or countries involved support the priority status of the project, as set (f) out in Article 7, and commit to comply with a similar timeline for accelerated implementation and other policy and regulatory support measures as applicable to projects of common interest in the Union.

(fa) the project fulfils the principle of "do no significant harm";

Commented]: Decarbonisation in the EU and in partner countries should go be detrimental to the other s should go hand in hand. One should no

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Commented []: Same justification as for PCIs.

3. The following specific criteria shall apply to projects of common interest falling within specific energy infrastructure categories:

(a) for electricity transmission, **distribution** and storage projects falling under the energy infrastructure categories set out in points (1)(a), (b), (c) and (e) of Annex II, the project is to contribute significantly to sustainability through the integration of renewable energy into the grid and the transmission **or distribution** of renewable generation to major consumption centres and storage sites, and at least one of the following specific criteria:

 (i) market integration, including through lifting the energy isolation of at least one Member State and reducing energy infrastructure bottlenecks; competition, interoperability and system flexibility;

(ii) security of supply, including through interoperability, system flexibility, cybersecurity, appropriate connections and secure and reliable system operation.

(b) for smart electricity grid projects falling under the energy infrastructure category set out in point (1)(d) of Annex II, the project is to contribute significantly to sustainability through the integration of renewable energy into the grid, and at least two of the following specific criteria:

(i) security of supply, including through efficiency and interoperability of electricity transmission and distribution in day-to-day network operation, avoidance of congestion, and integration and involvement of network users;

(ii) market integration, including through efficient system operation, use of interconnectors and lifting the energy isolation of at least one Member State which is not yet connected to the Trans-European electricity network;

(iii) network security, flexibility and quality of supply, including through higher uptake of innovation in balancing, cybersecurity, monitoring, system control and error correction.

(iv) facilitating smart energy sector integration.

(c) for carbon dioxide transport projects falling under the energy infrastructure categories set out in point (5) of Annex II, the project is to contribute significantly to all of the following specific criteria:

(i) avoid carbon dioxide emissions while maintaining security of energy supply;

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(ii) increase the resilience and security of carbon dioxide transport;

(iii) efficient use of resources, by enabling the connection of multiple carbon dioxide sources and storage sites via common infrastructure and minimising environmental burden and risks.

(d) for hydrogen projects falling under the energy infrastructure categories set out in point (3) of Annex II the project is to contribute significantly to sustainability, including by reducing greenhouse gas emissions, by enhancing the deployment of <u>renewable</u> [] hydrogen, with emphasis to hydrogen from renewable sources, or other safe and sustainable low earbon technologies and supporting variable renewable power generation by offering flexibility and/or storage solutions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

 (i) market integration, including by connecting existing or emerging hydrogen networks of Member States, or otherwise contributing to the emergence of an Unionwide network for the transport and storage of hydrogen, and ensuring interoperability of connected systems;

(ii) security of supply and flexibility, including through appropriate connections and facilitating secure and reliable system operation;

(iii) competition, including by allowing access to multiple supply sources and network users on a transparent and non-discriminatory basis.

(e) for electrolysers falling under the category set out in point (4) of Annex II, the project is to contribute significantly to all of the following specific criteria:

 (i) sustainability, including by reducing greenhouse gas emissions and enhancing the deployment of renewable or low earbon hydrogen.

 (ii) security of supply, including by contributing to secure, efficient and reliable system operation, or by offering storage and/or flexibility solutions, such as demand side response and balancing services;

(iii) enabling flexibility services such as demand response and storage by facilitating smart energy sector integration through the creation of links to other [] energy carriers and sectors.

(f) for smart gas grid projects falling under the energy infrastructure category set out in point
(2) of Annex II, the project is to contribute significantly to sustainability by [] ensuring the

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Commented [1]: We cannot accept that hydrogen remains unqualified. The deployment of renewable hydrogen is a clear indicate of sustainability and should remain as such in the text,

of sustainability and should remain as such in the text, alongside other indicators such as the reduction of greenhouse gas emissions. See our detailed comments on annex IV.

Commented [11]: Sustainability indicators should have two legs. The reduction of GHG emissions and the deployment of renewable hydrogen. They should remain distinct and clearly stated as such.

Commented Commented : As a reminder - this category should be better defined. We are concerned that the absence of a credible perspective to shift to 100% nonfossil gas in the infrastructure would create lock-in. integration of renewable and low-carbon gases, such as biomethane, or renewable hydrogen, into the gas distribution, [] transmission **and storage system** [] in order to reduce greenhouse gas emissions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

 (i) network security and quality of supply by improving the efficiency and interoperability of gas transmission and distribution in day-to-day network operation by, among others, addressing challenges resulting from the injection of gases of different qualities through the deployment of innovative technologies and cybersecurity;

(ii) market functioning and customer services;

(iii) facilitating smart energy sector integration through the creation of links to other energy carriers and sectors and enabling demand response.

4. For projects falling under the energy infrastructure categories set out in points (1) to [] ($\underline{5}$) of Annex II, the contribution to the criteria listed in paragraph 3 of this Article shall be assessed in accordance with the indicators set out in points (3) to (7) of Annex IV.

5. In order to facilitate the assessment of all projects that could be eligible as projects of common interest and that could be included in a regional list, each Group shall assess each project's contribution to the implementation of the same priority corridor or area in a transparent and objective manner. Each Group shall determine its assessment method on the basis of the aggregated contribution to the criteria referred to in paragraph 3. That assessment shall lead to a ranking of projects for internal use of the Group. Neither the regional list nor the Union list shall contain any ranking, nor shall the ranking be used for any subsequent purpose except as described in point (14) of Section 2 of Annex III.

In assessing projects, each Group shall give due consideration to:

(a) the urgency of each proposed project in order to meet the Union energy policy targets of decarbonisation, market integration, competition, sustainability and security of supply;

(b) complementarity with regard to other proposed projects;

(c) for proposed projects that are, at the time, projects of common interest, the progress of the project implementation and its compliance with the reporting and transparency obligations.

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As regards smart electricity grids and smart gas grids projects falling under the energy infrastructure category set out in points (1)(d) and point (2) of Annex II, ranking shall be carried out for those projects that affect the same two Member States, and due consideration shall also be given to the number of users affected by the project, the annual energy consumption and the share of generation from non-dispatchable resources in the area covered by those users.

ANNEX IV

RULES AND INDICATORS CONCERNING CRITERIA FOR PROJECTS OF COMMON INTEREST AND FOR PROJECTS OF MUTUAL INTEREST

(1) a project with significant cross-border impact is a project on the territory of a Member State, which fulfils the following conditions:

(a) for electricity transmission, the project increases the grid transfer capacity, or the capacity available for commercial flows, at the border of that Member State with one or several other Member States, having the effect of increasing the cross-border grid transfer capacity at the border of that Member State with one or several other Member States, by at least 500 Megawatt compared to the situation without commissioning of the project, or the **project decreases energy isolation of non-interconnected systems in one or more Member States**;

(b) for electricity storage, the project provides at least 225 MW installed capacity and has a storage capacity that allows a net annual electricity generation of 250 Gigawatt-hours/year;

(c) for smart electricity grids, the project is designed for equipment and installations at highvoltage and medium-voltage level. It involves transmission system operators, transmission and distribution system operators or distribution system operators from at least two Member States. Distribution system operators can be involved only with the support of the transmission system operators, of at least two Member States, that are closely associated to the project and ensure interoperability. A project covers at least 50000 users, generators, consumers or prosumers of electricity, in a consumption area of at least 300

Commented [1000]: DSOs should be able to cooperate without the approval of TSOs.

Gigawatthours/year, of which at least 20 % originate from variable renewable resources.

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The limit related to the number of users and the consumption cut-off point do not apply for small isolated systems (<u>as defined in</u> Directive (EU) 2019/944)

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(d) for hydrogen transmission, the project enables the transmission of hydrogen across the borders of the Member States concerned, or increases existing cross-border hydrogen transport capacity at a border between two Member States by at least 10 % compared to the situation prior to the commissioning of the project, and the project sufficiently demonstrates that it is an essential part of a planned cross-border hydrogen network and provides sufficient proof of existing plans and cooperation with neighbouring countries and network operators;

(e) for hydrogen storage or hydrogen reception facilities referred to in point (3) of Annex II, the project aims at supplying directly or indirectly at least two Member States;

(f) for electrolysers, the project provides at least [] 50 MW installed capacity and [] it brings benefits directly or indirectly to at least two Member States;

(g) for smart gas grids, a project involves transmission system operators, transmission and distribution system operators or distribution system operators from at least two Member States. Distribution system operators can be involved only with the support of the transmission system operators, of at least two Member States, that are closely associated to the project and ensure interoperability

(2) A project of mutual interest with significant cross-border impact is a project which fulfils the following conditions:

(h) for projects of mutual interest in the category set out in point (1)(a) and (e) of Annex II, the project increases the grid transfer capacity, or the capacity available for commercial flows, at the border of that Member State with one or more third countries and brings significant benefits, either directly or indirectly via interconnection with a third country, under the specific criteria listed in in Article 4(3), to at least one Member State or in case of a cluster of Projects to at least two Member States. The calculation of the benefits for the Member States shall be performed and published by the ENTSO for Electricity in the frame of Union-wide ten-year network development plan;

Commented [3000]: Given the level of maturity of the technology, the 50 MW threshold is still too high.

Commented []: Idem.

We also have c cerns about the absence of cross-border dimension criteria for this category. Projects should be subject to criteria similar to the ones applying to smart electricity grids (geographical coverage etc).

We are equally concerned about the absence of crossborder dimension criteria for the category "carbon dioxide transport".

Commented []: What does a cluster of project mean?

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(i) for projects of mutual interest in the category set out in point (3) of Annex II, the hydrogen project enables the transmission of hydrogen across at the border of a Member State with one or more third countries and proves bringing significant benefits, either directly or indirectly via interconnection with a third country under the specific criteria listed in in Article 4(3), to at least one Member State or in case of a cluster of Projects to at least two Member States. The calculation of the benefits for the Member States shall be performed and published by the ENTSO for Gas in the frame of Union-wide ten-year network development plan;

(j) for projects of mutual interest in the category set out in point (5) of Annex II, the project can be used to transport anthropogenic carbon dioxide by at least two Member States and a third country.

(3) Concerning projects falling under the categories set out in points (1)(a), (b), (c) and (e) of Annex II, the criteria listed in Article 4 shall be evaluated as follows:

(a) transmission of renewable energy generation to major consumption centres and storage sites measured in line with the analysis made in the latest available Unionwide ten-year network development plan in electricity, in particular by:

(i) for electricity transmission, estimating the amount of generation capacity from renewable energy sources (by technology, in megawatts), which is connected and transmitted due to the project, compared to the amount of planned total generation capacity from those types of renewable energy sources in the Member State concerned in 2030 according to the National Energy and Climate Plans submitted by Member States in accordance with Regulation (EU) 2018/1999 of the European Parliament and of the Council¹;

(ii) or electricity storage, comparing new capacity provided by the project with total existing capacity for the same storage technology in the area of analysis as defined in Annex V;

¹ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council, OJ L 328, 21.12.2018, p. 1

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Commented [____]: Idem

(b) market integration, competition and system flexibility measured in line with the analysis made in the latest available Union-wide ten-year network development plan in electricity, in particular by:

(i) calculating, for cross-border projects, the impact on the grid transfer capability in both power flow directions, measured in terms of amount of power (in megawatt), and their contribution to reaching the minimum 15% interconnection target, for projects with significant cross-border impact, the impact on grid transfer capability at borders between relevant Member States, between relevant Member States and third countries or within relevant Member States and on demand-supply balancing and network operations in relevant Member States;

(ii) assessing the impact, for the area of analysis as defined in Annex V, in terms of energy system-wide generation and transmission costs and evolution and convergence of market prices provided by a project under different planning scenarios, notably taking into account the variations induced on the merit order;

[]

(c) security of supply, interoperability and secure system operation measured in line with the analysis made in the latest available Union-wide ten-year network development plan in electricity, notably by assessing the impact of the project on the loss of load expectation for the area of analysis as defined in Annex V in terms of generation and transmission adequacy for a set of characteristic load periods, taking into account expected changes in climate-related extreme weather events and their impact on infrastructure resilience. Where applicable, the impact of the project on independent and reliable control of system operation and services shall be measured.

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(4) Concerning projects falling under the category set out in point (1)(d) of Annex II, the criteria listed in Article 4 shall be evaluated as follows:

(a)	Level of sustainability	:	This criterion shall be measured by assessing the extent of the grids' ability to connect and transport variable renewable energy.
(b)	Security of supply	:	This criterion shall be measured by the level of losses in distribution and /or transmission networks, the percentage utilisation (i.e. average loading) of electricity network components, the availability of network components (related to planned and unplanned maintenance) and its impact on network performances, the duration and frequency of interruptions, including climate related disruptions.
(c)	Market integration	:	This criterion shall be measured by assessing the innovative uptake in system operation, the energy isolation and interconnection, as well as the level of integrating other sectors and facilitating new business models and market structures.
(d)	Network security, flexibility and quality of supply	:	This criterion shall be measured by assessing the innovative approach to system flexibility, cybersecurity, efficient operability between TSO and DSO level, the capacity to include demand response, storage, energy efficiency measures, the cost-efficient use of digital tools and ICT for monitoring and control purposes, the stability of the electricity system and the voltage quality performance.

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(5) concerning hydrogen falling under the category set out in point (3) of Annex II, the criteria listed in Article 4 shall be evaluated as follows:

(a) Sustainability measured as the contribution of a project to: greenhouse gas emission reductions assessed by the compliance of hydrogen produced, transported or stored with the life cycle greenhouse gas emissions savings requirement of 70 % relative to a fossil fuel comparator of 94g CO2e/MJ. Life cycle greenhouse gas emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067 or ISO 14064-1. The life-cycle GHG emissions must include indirect emissions. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party, greenhouse gas emission reductions in different end-use applications, such as industry or transport; flexibility and seasonal storage options for renewable electricity generation; or the integration of renewable and low earbon hydrogen with a view to consider market needs and promote renewable hydrogen.

(b) market integration and interoperability measured by calculating the additional value of the project to the integration of market areas and price convergence, to the overall flexibility of the system.

(c) security of supply and flexibility measured by calculating the additional value of the project to the resilience, diversity and flexibility of hydrogen supply.

(d) competition measured by the project's contribution to supply diversification, including the facilitation of access to indigenous sources of hydrogen supply.

(6) concerning smart gas grid projects falling under the category set out in point (2) of Annex II, the criteria listed in Article 4 shall be evaluated as follows:

(a) level of sustainability measured by assessing the share of renewable and low-carbon gases integrated into the gas network, the related greenhouse gas emission savings towards total system decarbonisation and the adequate detection of leakage.

(b) quality and security of supply measured by assessing the ratio of reliably available gas supply and peak demand, the share of imports replaced by local renewable and low-carbon gases, the stability of system operation, the duration and frequency of interruptions per customer.

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Commented []: Sustainability should be measured with the same methodology as hydrogen produced under the electrolysers category. All GHG emissions should be taken into account. LCA should be involved.

Separately, the share of renewable hydrogen should also be a self-standing indicator.

(c) facilitation of smart energy sector integration measured by assessing the cost savings enabled in connected energy sectors and systems, such as the heat and power system, transport and industry.

(7) concerning electrolyser projects falling under the category set out in point (4) of Annex II the criteria listed in Article 4 shall be evaluated as follows:

(a) sustainability measured by assessing the share of renewable hydrogen, or low earbon hydrogen, or; asessing greenhouse gas emission savings by the compliance of hydrogen meeting with the criteria defined in point (4) (a) (ii) of Annex II integrated into the network, and the related greenhouse gas emission savings;

(b) security of supply measured by assessing its contribution to the safety, stability and efficiency of network operation, including through the assessment of avoided curtailment of renewable electricity generation;

(c) the facilitation of smart energy sector integration measured by assessing the cost savings enabled in connected energy sectors and systems, such as the gas, hydrogen, power and heat networks, the transport and industry sectors, and the volume of demand response enabled.

(8) concerning carbon dioxide transport projects falling under the category set out in point (5) of annex II the criteria listed in Article 4 shall be evaluated as follows:

(a) carbon dioxide avoidance measured by a capture rate of connected installations of at least [XX%] and greenhouse gas emission reductions of connected installations of at least [XX%] on a lifecycle perspective:

(b) increased resilience assessed by the impossibility for connected installations emitting carbon dioxide to decarbonise their process at a similar cost with other technoligical solutions in the absence of the project:

(c) efficient use of resources by establishing the existence of a sustained demand for carbon utlisation of at least [XX]% of the volume of the capacity of the transport infrastructure, and avoidance of environmental risk by ensuring the long-term neutralisation of transported carbon dioxide. Commented []: Here again sustainability should be measured following a twofold approach: GHG savings related to the 70% threshold and the promotion of renewable hydrogen as another self-standing indicator.

Commented [1992]: We thank the presidency for this proposal. Carbon dioxide transport cannot be the only category exonerated from sustainability criteria. We are ready to engage in constructive discussion to determine which criteria and which figures should be included.

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