

Frans Timmermans

Executive Vice-President of the European Commission

Thierry Breton

European Commissioner for Internal Market

Kadri Simson

European Commissioner for Energy

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Clean Hydrogen Alliance launch and future work strands - involvement of Civil Society Organisations/NGOs

Dear Executive-Vice President,
Dear Commissioners,

The EU's Clean Hydrogen Alliance, set to be launched on 8 July, is proposed to play an important role in implementing the future Hydrogen Strategy of the European Union. However, the undersigned organisations are concerned that the proposed Alliance risks establishing a clear conflict of interest by granting industry undue influence over the regulation of the burgeoning hydrogen sector: no other alliance has had such a strategic role in the past in terms of defining projects for funding and the framing of future policies.¹ In this context, we would like to emphasize the relevance of an independent, transparent and balanced approach for this alliance to be successful in supporting the drive towards a climate neutral Europe as soon as possible. Below we share some key recommendations regarding the design of the Clean Hydrogen Alliance, including the participation of civil society.

We are convinced that new types of alliances such as the Clean Hydrogen Alliance must be designed in **a more transparent and balanced way** to allow all relevant stakeholders to be involved in the various decision making processes. In this regard, we were dismayed to see a draft list of the future Alliance Governing Board members published in the media. In the leaked version of the Governing Board not a single seat has been assigned to a representative of environmental citizens' organisations.

Should there only be a limited number of seats to join the Alliance, we would request that the rule applies to all participants, including industry representatives; not only to CSOs representatives. Therefore, we would like to request a **larger delegation of CSOs representing environmental NGOs to participate in the Governing Board of the Hydrogen**

¹The Battery Alliance, launched in 2017, was designed to create a consortium of battery producers in Europe to drive up the EU production of batteries, not to define future projects for funding or influence policies

Alliance.² As CSOs we would like to have the chance to put in place the best experts for each topic and rely on a larger CSOs participation to meet the work demand of the future Clean Hydrogen Alliance, with a larger number of seats attributed to NGOs representatives. So far, only three seats have been assigned to ‘civil society’; and of these, one is assigned to a trade union, one to a national thinktank working at the interface between academia and industry, and the third is a foundation.

The governance structure of the Alliance must be set up according to **clear terms of reference**: a science based mandate, with an independent scientific body to define the alliance’s key objectives, a transparent decision-making procedure, as well as a clear commitment to climate neutrality and to the EU’s 2030 and 2050 climate objectives from all stakeholders involved.

Civil Society Organisation (CSOs) should be given a say from the early stage, when addressing definitions and priorities in the implementation of the upcoming Clean Hydrogen Strategy through the Clean Hydrogen Alliance, as well as its objectives and timelines. **We therefore request to be present from the start and participate at the launch event on July 8th represented by the directors of two climate and energy NGOs active on this topic, in addition to trade union voice.**

It is of great importance, now more than ever, that civil society is considered as an **equal partner** in contributing to the industrial decarbonisation pathways, with scientific expertise, to ensure the decarbonisation targets are achieved on time. Civil society is a key partner to ensure that the deployment of renewable hydrogen is targeted to the specific industries for which it plays an essential decarbonisation role, and prohibits the investment into new fossil fuels infrastructures. In the last years, CSOs have been concerned about the industry role in determining awarding public money on energy infrastructures development.³ This alliance is the opportunity to get critical investments in the right direction. We noticed with surprise that the renewables industry, a crucial partner in reaching the clearly stated goal of producing green hydrogen, has not even been invited to the launch nor it is part of the Governing Board of the alliance, despite the fact that the Commission committed to deploy investments into renewable hydrogen.

Finally, citizens overwhelmingly want a sustainable and clean future. So getting civil society involved in the hydrogen alliance is critical to ensure it helps, not hinders, our path to climate neutrality and answers the urgent call from EU citizens.

Yours sincerely,

Ester Asin, Director, WWF EPO

² See for example the involvement of CSOs in the Circular Plastics Alliance.

³ See the [Global Witness report](#)

Jonas Helseth, CEO, Bellona Europa

Sabine Frank, Executive Director, Carbon Market Watch

Wendel Trio, Director, Climate Action Network Europe

Jeremy Wates, Secretary General, European Environmental Bureau

Nick Mabey, Chief Executive, Third Generation Environmentalism

William Todts, Executive Director, Transport & Environment