

(English version)

**Question for written answer E-004601/25
to the Commission
Eero Heinäluoma (S&D)
(19 November 2025)**

Subject: Further clarifying the Delegated Act on low-carbon hydrogen

On 8 July 2025 the Commission published a Delegated Act on low-carbon hydrogen ⁽¹⁾. This is a welcome step in clarifying the methodology for calculating greenhouse gas emissions across different hydrogen production pathways. However, some questions still remain and the Commission has promised to publish further clarifications. To fully leverage the potential of the hydrogen economy in Europe and investments into hydrogen production, clarity regarding EU legislation is paramount.

The delegated act classifies solid carbon as an emission unless it is permanently stored or chemically bound into products. However, the Commission lists only a limited range of applications for solid carbon classified as chemically bound into products and excludes, for example, graphite. Battery-grade graphite can be produced through a hydrogen production process where methane is split into low-carbon hydrogen and solid carbon. The delegated act's methodology in its current form does not support any innovative alternatives and applications for solid carbon, including battery-grade graphite.

1. Will the Commission expand the list of applications for solid carbon, classified as incorporated into products?
2. When will an updated list be presented?
3. How can the Commission enhance the link between this delegated act and the production of critical raw materials in Europe?

Submitted: 19.11.2025

**Answer given by Mr Jørgensen on behalf of the European Commission
(2 March 2026)**

The Commission Delegated Regulation (EU) 2025/2359 ⁽¹⁾ specifies the methodology for assessing greenhouse gas emissions savings from low-carbon fuels, building clarity and stimulating the production of low-carbon hydrogen.

With regards the definition of solid carbon, the methodology refers to the Commission Delegated Regulation (EU) 2024/2620 ⁽²⁾, whose Article 4 specifies that the list of products that are considered to meet the requirements for permanently chemically binding carbon in products shall be reviewed based on relevant technological developments and innovation in the field of permanent carbon storage in products, or improvements in monitoring, reporting and verification practices.

Therefore, there is at this stage no set timeline for updating the list of products, as it is subject to new developments and evidence being presented by stakeholders supporting the claims of additional products that meet the requirements set out in Article 3(1) of that regulation.

The legal basis in the ETS Directive (Directive (EU) 2018/410 ⁽³⁾) for this delegated regulation does not establish any links between what products are considered as permanently chemically binding emissions and critical raw materials.

¹ C(2025)4674.

⁽¹⁾ https://eur-lex.europa.eu/legal-content/EN/PIN/?uri=OJ:L_202502359.

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R2620>.

⁽³⁾ <https://eur-lex.europa.eu/eli/dir/2018/410/oj/eng>.