

## EUROMOT POSITION

### Amendments to a Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on common rules for the internal markets in renewable and natural gases and in hydrogen - 2021/0425(COD)

28th of October 2022

---

#### 1. General

In this document feedback on the European Commission Gas Directive revision proposal /1/ is given.

#### 2. Amendment Proposals

Text proposal by the Commission	EUROMOT proposal for amendment
<b>Article 58 – paragraph 11</b>  The transmission system operator shall make public detailed information regarding the quality of the gases transported in its networks, based on <b>Articles 16 and 17 of Regulation (EU) 2015/703</b>	<b>Article 58 – paragraph 11</b>  The transmission system operator shall make public detailed information regarding the quality of the gases transported in its networks, based on <b>the</b> the properties of the gas as present in the <b>revised EN 16726:2015 standard. Information shall preferable be in real time.</b>

#### Justification for above mentioned amendment

According to the Gas Directive proposal transmission, distribution system and network operators shall *maintain the gas quality* in their facilities *according to applicable gas quality standards*. Gas quality has a fundamental impact on amongst all safety, emissions, product quality and energy

efficiency and **thus stability and sufficient information is a pre-requisite for all network (end) user operations**. In the Explanatory Memorandum /1/ the importance of the gas quality is further explained “*Differences in gas quality parameters and in the volume of hydrogen blended in the natural gas system can affect the design of gas infrastructure, end-user applications and cross-border system interoperability, thus risk fragmenting the internal market. However, **current gas quality rules are not fit to deal with future developments***”.

Article 58(11) /1/ is regarding gas quality information referring to Articles 16 and 17 of Regulation EU 2015/703. Article 16 is stipulating *only a few parameters* namely WI (Wobbe Index) and gross calorific value to be mandatorily reported on an hourly basis by the transmission system operators. According to Article 17 additional short-term gas quality information *may* be reported to final customers with sensitive operational processes. But the **additional reporting is only of indicative quality and not mandatory** if national regulatory authority has not requested for this.

In Recital (5) of EU 2015/703 is the following text “*The provisions of this Regulation relating to gas quality should provide effective solutions without prejudice to the adoption of a European-wide standard for high-calorific gas as is being developed by CEN pursuant to the standardisation process under mandate M/400*”. Under mandate M/400 H-gas standard the EN 16726:2015 (the H-gas standard) is being revised to include additional gas parameters such as WI-range, etc. Real time monitoring of the gas parameters is preferred in order to enable/secure optimised performance of end user appliances and ensure maintaining the values within the range/bandwidth of the standard. Article 58(11) needs to be revised in order to fulfil the future gas quality information need ambitions, current reference to Articles 16 and 17 of EU 2015/703 is **not fit to deal with future developments in gas quality**. See sources /3/ and /4/ for more information.

### 3. Sources

/1A/ “Proposal for a Directive of the European Parliament and of the Council on common rules for the international markets in renewable and natural gases and in hydrogen” at web: [https://eur-lex.europa.eu/resource.html?uri=cellar:2f4f56d6-5d9d-11ec-9c6c-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:2f4f56d6-5d9d-11ec-9c6c-01aa75ed71a1.0001.02/DOC_1&format=PDF)

/1B/ Annexes at web: [https://eur-lex.europa.eu/resource.html?uri=cellar:2f4f56d6-5d9d-11ec-9c6c-01aa75ed71a1.0001.02/DOC\\_2&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:2f4f56d6-5d9d-11ec-9c6c-01aa75ed71a1.0001.02/DOC_2&format=PDF)

/2/ EU Regulation 2015/703 at web: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R0703&from=EN>

/3/ [EUROMOT Position paper on “Directive Proposal for the Internal Markets in Renewable and Natural Gases and in Hydrogen – 2021/0425\(COD\)”](https://www.euromot.eu/wp-content/uploads/2022/11/2021_0425_COD-EUROMOT-Position-Gas-Directive-Rev-2022-10.pdf), 04.10 2022, at web: [https://www.euromot.eu/wp-content/uploads/2022/11/2021\\_0425\\_COD-EUROMOT-Position-Gas-Directive-Rev-2022-10.pdf](https://www.euromot.eu/wp-content/uploads/2022/11/2021_0425_COD-EUROMOT-Position-Gas-Directive-Rev-2022-10.pdf)

/4/ EUROMOT POSITION EUROMOT REVISION OF EU RULES ON GAS MARKET ACCESS – EUROMOT POSITION ON GAS QUALITY REQUIREMENTS, June 2021 at web: [https://www.euromot.eu/wp-content/uploads/2021/06/EU-gas-legislation-revision\\_EUROMOT-position-on-gas-quality-requirements\\_FINAL\\_16-June-2021.pdf](https://www.euromot.eu/wp-content/uploads/2021/06/EU-gas-legislation-revision_EUROMOT-position-on-gas-quality-requirements_FINAL_16-June-2021.pdf)



EUROMOT aisbl

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm

**For more information please contact:**

EUROMOT aisbl - European Association of Internal Combustion Engine Manufacturers  
Rue Joseph Stevens 7, 1000 Brussels, Belgium  
Dr Peter Scherm – General Manager  
Phone: +32 (0) 289321-41  
Email: [peter.scherm@euromot.eu](mailto:peter.scherm@euromot.eu)  
[www.euromot.eu](http://www.euromot.eu)

TVA BE 0599.830.578  
RPM Brussels  
EU Transparency Register ID number: 6284937371-73



**EUROMOT aisbl**

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

**PRESIDENT**

Dr Holger Lochmann

**GENERAL MANAGER**

Dr Peter Scherm

## **THIS IS EUROMOT**

Founded in 1991, EUROMOT is the European association of internal combustion engine and alternative powertrain manufacturers. Representing the key global manufacturers for over 30 years, we provide an invaluable centre of expertise for businesses, authorities, regulators and public stakeholders worldwide. We are the industry's united voice to drive smart and gold standard global regulations for sustainable mobile machinery and stationary applications, helping the manufacturers shape innovations and markets for the future.

With an ecosystem of working groups spanning current and future power and mobility systems, we facilitate cross-fertilisation of innovation across industries. EUROMOT provides an essential gateway to the EU Single Market and forms a bridge for the transition from traditional to alternative energy and advanced powertrains.

Since our foundation, we have been facilitating ever increasing environmentally friendly and sustainable products as well as the decarbonization of our sector and its transition to low/zero-carbon emissions and renewable energy. With a membership encompassing all major ICE and alternative powertrain manufacturers and well-established connections to regulators, EUROMOT is uniquely positioned to decarbonise entire industries from agriculture to construction and from land-based to marine alongside stationary power for heat and electricity.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

## **OUR MEMBERS**



[www.euromot.eu](http://www.euromot.eu)



EUROMOT aisbl

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm