EUROMOT

The European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers

EUROMOT POSITION

Amendment proposals for 2025/0394 (COD) / COM (2025) 986 final (Annexes 1 and 2)

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directives 2008/98/EC, 2010/75/EU, (EU) 2015/2193 and (EU) 2024/1785 of the European Parliament and of the Council as regards simplification of some requirements and reduction of administrative burden

Bruxelles, 10 March 2026

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents manufacturers of internal combustion engines and alternative powertrains installed in nonroad mobile machinery, marine and stationary applications, as well as power tools and garden equipment.

We welcome the opportunity to contribute to the proposed simplification of administrative burdens in environmental legislation as provided by the eighth omnibus package, primarily to 2025/0394 (COD) and COM (2025) 986 final, addressing the Industrial Emissions Directive 2010/75/EU and the Medium-Sized Combustion Plants Directive (EU) 2193/2015.

1. Introduction

To meet the target of ensuring that the environmental goals of the European Union are achieved in more efficient, less costly and smarter ways, EUROMOT proposes amendments to both, 2025/0394 (COD) / COM (2025) 986 final, addressing the following topics:

- Hydrogen content in fuel gas blends or pure H2, primarily the need for NOx emission (concentration) correction factor
- Oxygen-enriched/Oxy-fuel combustion

In below tables and text, our amendment proposals to 2025/0394 (COD) / COM (2025) 986 final are given in in strikethroughs and **bold text**, along with respective explanations.

2. Amendment proposals to 2025/0394 (COD) – Main text

2.1. Recital (17) (page 13-14)

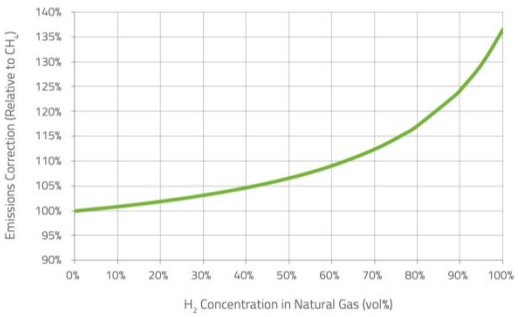
2025/0394 (COD)	EUROMOT Proposal
(17) In order to simplify **…**	(17) In order to simplify **…**
Therefore, to simplify the use of hydrogen as a fuel, the emission limit values set out in point 6 of Part 1 and point 6 of Part 2 of Annex V to Directive 2010/75/EU, as well as in in Annex II of Directive (EU) 2015/2193, should not be applicable to combustion plants firing gas ~~**with more than 20 % (by volume) of**~~ hydrogen.	Therefore, to simplify the use of hydrogen as a fuel, the emission limit values set out in point 6 of Part 1 and point 6 of Part 2 of Annex V to Directive 2010/75/EU, as well as in in Annex II of Directive (EU) 2015/2193, should not be applicable to combustion plants firing gas **blended with / or pure** hydrogen.
For such plants, Member States should ensure that the overall load of NOx eventually released into the air ~~**over one year**~~ is not increased compared to the situation where the emissions from the installation concerned would remain compliant with the emission limit values set out for NOx for the combustion of natural gas, without prejudice to stricter measures required pursuant to Article 18 of Directive 2010/75/EU and Article 6(9) of Directive (EU) 2015/2193.	For such plants, Member States should ensure that the overall load of NOx **(mg/MJfuel)** eventually released into the air is **on par/not increased** compared to the situation where the emissions from the installation concerned would remain compliant with the emission limit values set out for NOx for the combustion of natural gas, without prejudice to stricter measures required pursuant to Article 18 of Directive 2010/75/EU and Article 6(9) of Directive (EU) 2015/2193.
~~**In such cases, monitoring and compliance assessment should be adjusted accordingly.**~~	**The NOx concentration limit set out for the combustion of natural gas when burning H2-natural gas blends or pure H2 is corrected according to an inserted graph.**

2.2. Recital (18) (page 14)

2025/0394 (COD)	EUROMOT Proposal
(18) ...	(18) ...
Enabling the use of oxy-fuel combustion under Directive 2010/75/EU and Directive (EU) 2015/2193 thus requires giving competent authorities ~~**flexibility**~~ to assess compliance with the emission limit values referred to in Article 30 of Directive 2010/75/EU and Article 6 of Directive (EU) 2015/2193.	Enabling the use of oxy-fuel combustion under Directive 2010/75/EU and Directive (EU) 2015/2193 thus requires giving competent authorities **guidance** to assess compliance with the emission limit values referred to in Article 30 of Directive 2010/75/EU and Article 6 of Directive (EU) 2015/2193

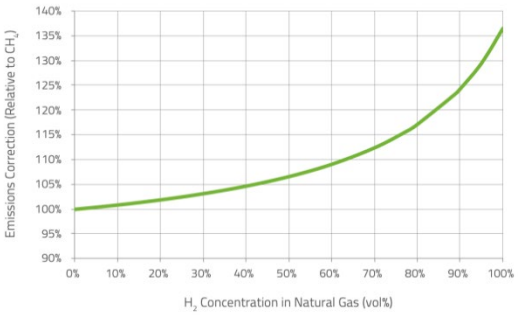
3. Amendment proposals to COM (2025) 986 final – Annex I

3.1. Section "3 - Annex V to Directive 2010/75/EU is amended as follows:"

COM (2025) 986 final – Annex 1	EUROMOT Proposal
(a) in PART 1, point 6 is amended as follows: … That footnote reads as follows: (5) The emission limit value is not applicable to combustion plants firing gas ~~**with more than 20 % (by volume)**~~ of hydrogen. In such case, Member States shall ensure that the overall load of NOx eventually released into the air ~~**over one year**~~ is not increased compared to the situation where the emissions from the installation concerned remained compliant with emission limit values set out in this point for NOx for the combustion of natural gas, without prejudice to stricter measures required pursuant to Article 18.	(a) in PART 1, point 6 is amended as follows: … That footnote reads as follows: (5) The emission limit value is not applicable to combustion plants firing gas **blended with / or pure** hydrogen. In such case, Member States shall ensure that the overall load of NOx (mg/MJ fuel) eventually released into the air **is on par/not** increased compared to the situation where the emissions from the installation concerned remained compliant with emission limit values set out in this point for NOx for the combustion of natural gas, without prejudice to stricter measures required pursuant to Article 18. **NOx concentration limit set out in this point for the combustion of natural gas when burning H2-natural gas blends or pure H2 is corrected according to below graph.**
	 **Graph: Energy-based (concentration) emissions correction factor for increasing hydrogen content in natural gas compared to pure natural gas case (engine, gas turbine, boiler).**

3.2. Section "3 - Annex V to Directive 2010/75/EU is amended as follows:"

COM (2025) 986 final – Annex 1	EUROMOT Proposal
(b) in point 6 of PART 2, the following subparagraph is added at the end of that point: The emission limit value is not applicable to combustion plants firing gas ~~**with more than 20 % (by volume)**~~ of hydrogen.	(b) in point 6 of PART 2, the following subparagraph is added at the end of that point: The emission limit value is not applicable to combustion plants firing gas **blended with / or pure** hydrogen.

In such case, Member States shall ensure that the overall load of NOx eventually released into the air ~~**over one year**~~ is not increased compared to the situation where the emissions … required pursuant to Article 18.	In such a case, Member States shall ensure that the overall load of NOx **(mg/MJfuel)** eventually released into the air **is on par/**not increased compared to the situation where the emissions … required pursuant to Article 18. **NOx concentration limit set out in this point for the combustion of natural gas when burning H2-natural gas blends or pure H2 is corrected according to below graph.**  **Graph: Energy-based (concentration) emissions correction factor for increasing hydrogen content in natural gas compared to pure natural gas case (engine, gas turbine, boiler.**

Reasoning:
By use of the correction curve (as function of increasing H_2 vol-% of the gas blend or pure H2) current NOx emission concentration measurement praxis in the field (stack) applied for natural gas fuel fired plants can be maintained. As can be seen from the example below, NOx emission amount in (mass) unit mg/MJfuel stays by this approach at the same level for pure natural gas and hydrogen (blend or pure H2) cases. That means, the target that NOx mass (fuel energy related) emission amounts for the different fuel modes are on same level/not increased, is achieved. This enables also a fast/cost-effective compliance check procedure without extra calculation procedure needs for the emission compliance check. For CEMS applications there are **no additional** stack compound/parameter measurements with associated, time consuming, expensive calibration procedures related to EN 14181, such as QAL 1, QAL 2, AST or QAL 3. Correction curve should be applied for all hydrogen gas fuel blend concentrations not only for enhanced gas fuel H_2-concentratioins.

Example:
For example, a NOx ELV (IED (2.0) Annex V Part 2, natural gas engine) of 75 mg/m^3 at 15% O_2, dry, when firing natural gas, is equivalent to 63,38 mg/MJfuel [= 75 mg/m^3 * 0.845 m^3/MJfuel]. The same NOx ELV of 75 mg/m^3, when firing (pure) hydrogen, is equivalent to 46,2 mg/MJfuel [= 75 mg/m^3 * 0.616 m^3/MJfuel]. This illustrates the penalty that would be applied to (pure) hydrogen if the flue gas volume difference is not taken into account.
To achieve parity, an increased NOx ELV of 102,9 mg/m^3 is required, when firing (pure) hydrogen, to give the same result of 63,38 mg/MJfuel [= 102,9 mg/m^3 * 0.616 m^3/MJfuel]. In other words, when setting an ELV for pure hydrogen in mg/m^3, this needs to be multiplied by a correction factor of 1.372 to achieve parity with natural gas.
An ELV of 75 mg/m^3 (15 % O2) for natural gas is then equivalent to an ELV of 102,9 mg/m^3 (15 % O2) for (pure) hydrogen using the same example. See /4/, /5/ for more information.

3.3. Section “3 - Annex V to Directive 2010/75/EU is amended as follows:”

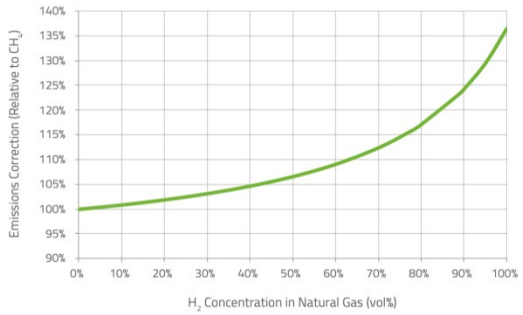
COM (2025) 986 final – Annex 1	EUROMOT Proposal
(c) in PART 4, the following points 3 to 5 are added: 3. … 4. When fuel combustion takes places in an oxygen-enriched atmosphere, the results of the measurements ~~**can**~~ be standardised at an oxygen content laid down by ~~**the competent authority**~~ reflecting the special circumstances of ~~**the individual case.**~~ ~~**When the emissions of polluting substances are reduced by waste gas treatment, the standardisation with respect to the oxygen contents provided for in point 3 shall be done only if the oxygen content measured over the same period as for the polluting substance concerned exceeds the relevant standard oxygen content.**~~	(c) in PART 4, the following points 3 to 5 are added: 3. … 4. When fuel combustion takes places in an oxygen-enriched atmosphere, the results of the measurements **shall** be standardised at an oxygen content laid down **in this Directive Annex V Part 1(1) and Part 2(1)** reflecting the special circumstances of **the individual prime movers (boiler, gas turbine, gas engine) and fuel used**.

Reasoning:
A common, coherent approach as set in Annex V Part (1) and Part (2) of IED 2.0 /6/ shall be maintained for the measured emission concentration corrections to the prime mover specific reference oxygen conditions before comparison to set emission limits. This would be according to the EU Omnibus targets. Rulings shall be clear and not allow fragmented/differing approaches in the European Union.

4. Amendment proposals to COM (2025) 986 final – Annex 2

4.1. Section “1. Annex II to Directive (EU) 2015/2193 is amended as follows:”

COM (2025) 986 final – Annex 2	EUROMOT Proposal
a) In Part 1, tables 1, 2 and 3 as regards .. regarding that pollutant: (*) The emission limit value is not applicable to combustion plants firing gas ~~**with more than 20 % (by volume)**~~ of hydrogen. Member States shall ensure that the overall load of NOx eventually released into the air ~~**over one year**~~ is not increased compared to the situation where the emissions … required pursuant to Article 6 (9).	a) In Part 1, tables 1, 2 and 3 as regards … regarding that pollutant (*) The emission limit value is not applicable to combustion plants firing gas **blended with/ or pure** hydrogen. Member States shall ensure that the overall load of NOx **(mg/MJ fuel)** eventually released into the air is **on par/**not increased compared to the situation where the emissions … required pursuant to Article 6 (9). **NOx concentration emission limit set out in this point for the combustion of natural gas when burning H2-natural gas blends or pure H2 is corrected according to below graph.**

b) In Part 2, tables 1 and 2, as regards … mentioned in the sixth column regarding that pollutant: '(*) The emission limit value is not applicable to combustion plants firing gas ~~**with more than 20 % (by volume)**~~ of hydrogen. Member States shall ensure that the overall load of NOx eventually released into the air ~~**over one year**~~ is not increased … required pursuant to Article 6 (9).';	b) In Part 2, tables 1 and 2, as regards … mentioned in the sixth column regarding that pollutant: "(*) The emission limit value is not applicable to combustion plants firing gas blended **with / or pure hydrogen.** Member States shall ensure that the overall load of NOx **(mg/MJ fuel)** eventually released into the air is **on par/**not increased … required pursuant to Article 6 (9). **NOx concentration limit set out in this point for the combustion of natural gas when burning H2-natural gas blends or pure H2 is corrected according to below graph.**  **Graph: Energy-based (concentration) emissions correction factor for increasing hydrogen content in natural gas compared to pure natural gas cases (engine, gas turbine, boiler)**

Reasoning:
By use of the correction curve (as function of increasing H_2 vol-% of the gas blend or pure H2) current NOx emission concentration measurement praxis in the field (stack) applied for natural gas fuel fired plants can be maintained. As can be seen from the example below, NOx emission amount in (mass) unit mg/MJfuel stays by this approach at the same level for pure natural gas and hydrogen (blend/or pure H2) cases. That means, that the target that NOx mass (fuel energy related) emission amounts for the different fuel modes are on same level/not increased, is achieved. This enables also a fast/cost-effective compliance check procedure without extra calculation procedure needs for the emission compliance check. For CEMS applications there are **no additional** stack compound/parameter measurements with associated time consuming, expensive calibration procedures related to EN 14181, such as QAL 1, QAL 2, AST or QAL 3. Correction curve should be applied for all hydrogen gas fuel blend concentrations not only for enhanced gas fuel H_2-concentratioins.

Example:
For example, a NOx ELV (MCPD Annex II, Part 2, natural gas engine) of 95 mg/m^3 at 15% O_2, dry, when firing natural gas, is equivalent to 80.28 mg/MJfuel [= 95 mg/m^3 * 0.845 m^3/MJfuel]. The same NOx ELV of 95 mg/m^3, when firing (pure) hydrogen, is equivalent to 58,52 mg/MJfuel [= 95 mg/m^3 * 0.616 m^3/MJfuel]. This illustrates the penalty that would be applied to (pure) hydrogen if the flue gas volume difference is not taken into account. To achieve parity, an increased NOx ELV of 130,3 mg/m^3 is required, when firing (pure) hydrogen, to give the same result of 80,28 mg/MJfuel [= 130,32 mg/m^3 * 0.616 m^3/MJfuel]. In other words, when setting an ELV for pure hydrogen in mg/m^3, this needs to be multiplied by a correction factor of 1.372 to achieve parity with natural

gas.
An ELV of 95 mg/m^3 (15 % O2) for natural gas is then equivalent to an ELV of 130,3 mg/m^3 (15 % O2) for (pure) hydrogen using the same example. See /4/, /5/ for further information

4.2. Section “2. Annex III to Directive (EU) 2015/2193 is amended as follows:”

COM (2025) 986 final – Annex 2	EUROMOT Proposal
(d) In PART 2, the following points 4, 5 and 6 are added: 4. … 5. When fuel combustion takes places in an oxygen-enriched atmosphere, the results of the measurements ~~**can**~~ be standardised at an oxygen content laid down by ~~**the competent authority**~~ reflecting the special circumstances of ~~**the individual case.**~~ ~~**When the emissions of polluting substances are reduced by waste gas treatment, the standardisation with respect to the oxygen contents provided for in the first subparagraph shall be done only if the oxygen content measured over the same period as for the polluting substance concerned exceeds the relevant standard oxygen content.**~~	(d) In PART 2, the following points 4, 5 and 6 are added: 4. … 5. When fuel combustion takes places in an oxygen-enriched atmosphere, the results of the measurements **shall** be standardised at an oxygen content laid down **in this Directive in Annex II** reflecting the special circumstances of **the individual prime movers (boiler, gas turbine, gas engine) and fuel used.**

Reasoning:
A common, coherent approach as set in MCPD Annex II /7/ shall be maintained for the measured emission concentration corrections to prime mover specific reference oxygen conditions before comparison to set emission limits. This would be according to the EU Omnibus targets. Rulings shall be clear and not allow fragmented/differing approaches in the European area.

5. Conclusion

In above chapters, EUROMOT is proposing amendments to 2025/0394 (COD) / COM (2025) 986 final to ensure the targets of simplifying for sustainable competitiveness are met for IED and MCPD by implementing coherent faster and more efficient procedures.
We remain available for any further questions you might have on our amendment proposals.

6. Sources

/1/ COM(2025) 986 final 2025/0394 (COD) “Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directives 2008/98/EC, 2010/75/EU, (EU) 2015/2193 and (EU) 2024/1785 of the European Parliament and of the Council as regards simplification of some requirements and reduction of administrative burden” at web: b45b4ac2-7f40-4b82-acb3-815e134807b6_en

/2/ COM(2025) 986 final ANNEX 1, at web: 46a26a52-f84d-4a6e-bbe5-705546438c9d_en

/3/ COM(2025) 986 final ANNEX 2, at web: 93fd695e-c0d7-4b86-9795-810846b2ab6d_en

/4/ ETN Position Paper, March 2023, «Proposed NOx Emissions reporting for hydrogen containing fuels«, https://etn.global/wp-content/uploads/2023/03/ETN-Proposed-NOx-emissions-reporting-for-hydrogen-containing-fuels-Position-paper-March2023.pdf

- See Appendix pages (6-9).
- **Fuel factor m3/MJfuel at 15 % O2 (dry) in Table 1**
- Note page 3 quote: “*Alternatively, the above correction factor given in Table 1 can be used to adjust a natural gas ELV, in mg/m^3 at 15% O2 dry, to give the* ***equivalent hydrogen ELV,*** *in mg/m^3. The correction factor* ***is independent of the oxygen reference condition and is applicable to both gas turbines and gas fired boilers*** *“*
- **Note that the reference O_2-% for the gas engine is 15 vol-%!**

/5/ EUROMOT POSITION PAPER “Power plant emission with Hydrogen as energy carrier”, 2025 at EUROMOT Position Paper 2017

/6/ Amended IED 2020/75/U (IED 2.0) at web: CL2010L0075EN0010010.0001_cp 1..1

/7/ MCPD 2015/2193 at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L2193

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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