

Contribution of EIGA and EHA to the Review of the Seveso II Directive

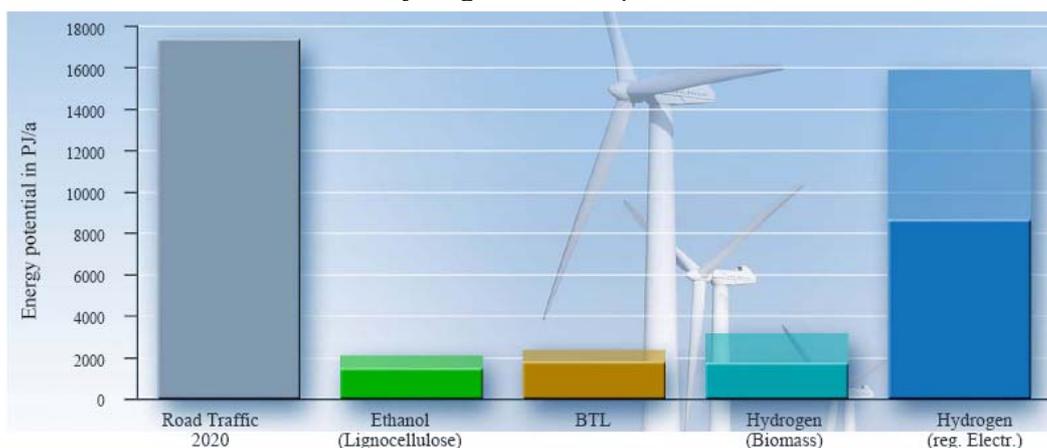
The European Industrial Gas Association, EIGA, representing the main European industrial gas suppliers and the European Hydrogen Association, EHA, representing 15 national associations and the main hydrogen infrastructure development companies, welcome the opportunity to contribute to the review of the Seveso II Directive (96/82/EC). This review comes at a particular appropriate time with regards to EU's efforts to integrate the use of hydrogen as a clean energy carrier to power transport and stationary applications.

Since 2002, the hydrogen production and distribution and fuel cell component and system industry in Europe, together with the Commission, EU Member States and regional and local authorities, has joined forces to create one of the first European Industrial Initiatives (EII) to address two of the "key EU energy technology challenges for the next 10 years" to meet EU targets, as mentioned in the EU Strategic Energy Technology Plan (SET Plan)¹:

1. Bring to mass market more efficient energy conversion and end-use devices and systems, in buildings, transport and industry, such as poly-generation and fuel cells;
2. Develop the technologies and create the conditions to enable industry to commercialise hydrogen fuel cell vehicles.

These efforts have accumulated into the establishment of the EU Joint Undertaking for Fuel Cells and Hydrogen as the first EII in 2008. Several hydrogen transport demonstration projects, including the development of onsite hydrogen production and refueling stations, have demonstrated the technical feasibility of using hydrogen as a fuel for public and private transport applications and in stationary power systems². Hydrogen applications will therefore be an important driver of EU's objective to decarbonise Europe's energy and transport system by 2050 as indicated by president Barroso.

Potential of hydrogen for European road traffic





Recently Daimler AG, Ford Motor Company, General Motors Corporation/Opel, Honda Motor Co., Ltd., Hyundai Motor Company, Kia Motors Corporation, the alliance Renault SA and Nissan Motor Corporation and Toyota Motor Corporation, announced that they are anticipating that a significant number of electric vehicles with fuel cells, a few hundred thousand units on a worldwide basis, will be commercialised from 2015 onwards.

EHA Industry members, Shell and Linde are among the partners of the "H2 Mobility"³ initiative established last September; together with Daimler, EnBW, OMV, Total, Vattenfall and the NOW GmbH National Organisation for Hydrogen and Fuel Cell Technology they are collaborating in evaluating options for an area-wide roll-out of hydrogen fuelling stations, starting in Germany, to support the introduction of series produced hydrogen powered vehicles .

EIGA and the EHA would therefore like to ask the European Commission to consider hydrogen in view of these developments since the implementation of the Seveso II Directive in 1996 and to adapt the new Directive to the new conditions with regards to the commercial use of hydrogen as a clean energy carrier. We more specifically suggest that hydrogen be deleted from the list of specifically named substances in Annex 1, so that it is exclusively covered by the "extremely flammable" category.

Thresholds for hydrogen are currently 5 and 50 tons in the Seveso II Directive ; comparable to those of "Very Toxic" substances (5 and 20 tons). Even Chlorine has a higher threshold of 10 tons, and those for "Liquefied extremely flammable gases (including LPG) and natural gas" are 50 and 200 tons.

At the current lower limit of 5 tons, road vehicle fuelling stations could fall under the scope of the Seveso directive, severely and unjustifiably compromising the development of the hydrogen refuelling infrastructure necessary to support the commercialisation of hydrogen vehicles projected from 2015 onwards, as indicated above.

With the change proposed the lower limit for hydrogen would be raised to 10 tons in the new Directive. This remains quite conservative, as the consequences of an accidental release of hydrogen are not worse overall than for other flammable gases.

We would be happy to submit any further clarifications if needed.

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¹ Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions A European Strategic Energy Technology Plan (SET-Plan). 'Towards a low carbon future', COM(2007) 723 final.

² Final Report of the HyFleet CUTE Bus project (November 2009): <http://www.global-hydrogen-bus-platform.com/InformationCentre/Downloads>

³ Press Release H2 Mobility: F: hugin.info/125064/R/1340705/320439.pdf