

EUROPEAN STEEL ASSOCIATION



Key steel low-CO₂ projects of the EU steel industry

Circular Economy (CE)	\bigcirc
Carbon Direct Avoidance (CDA)	
H₂-based metallurgy	\Box
Electricity-based metallurgy	1
Smart Carbon Usage (SCU)	
Proces Integration	Ю
Carbon Valorisation/CCU	[}*
Carbon Capture and Storage CCS ²	Ŧ

- **60** projects •
- Technology Readiness Level : at least **TRL 7**
- Starting year: all **before 2030** •
- Potential CO₂ abatement in 2030 : 80 • Mio tons/year (over 1/3 of current direct and indirect CO₂ emissions)
- Capex needs : 31 bn EUR •
- Opex needs : 54 bn EUR



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Key issues under DA on renewable hydrogen

- **Monthly correlation criteria** shall become the *default rule* for hydrogen in industry as most technically appropriate solution for a baseload consumption profile (art. 4(2)).
- **Geographical correlation criteria for PPAs-covered RFNBO production** shall be set at country level to protect the case of MS with many bidding zones relying on internal electricity trade and with industrial ecosystems located far away (art. 4(2)).
- **Demand aggregators**: RFNBOs producers shall be able to source electricity via PPAs signed with aggregators as hedge solutions for baseload consumers against cases of low production period via certification schemes complying with the provisions of the DA (art. 4).
- RES share threshold for grid-electricity in the bidding zone approach shall be set at 70% as reference value potentially achievable by many MS (art. 4(1)).
- Grandfathering clause to be extended until 2030 (art. 7 and 8).



Key issues under DA on GHG emissions savings methodology

- The arbitrary definition of "unsustainable processes" severely undermine legal and investment certainty of CCU projects in industry by affecting the calculus of emission from supply of inputs -e_{ex use} (i.e., emissions from inputs existing use or fate) and the emission savings potentials of CCU products (Recital 7).
- The 2035 sunset date for considering emissions captured from "unsustainable processes" as avoided emissions will disincentive economic investments already in in the next 3 since ROIs for CCU projects require at least 10 years of secured revenues (Recital 7).
- Emissions value to be attributed to the supply of rigid inputs (e.g.,, blast furnace gases and displaced energy) by referring to average national grid (with high carbon footprint >100gCO2eq) will make it impossible for CCU products to meet the 70% threshold. If renewable electricity would be included in the equation, the results will be positively different (Annex, para. 10(a)).

