



European Commission
DG Enterprise
Automotive Unit
Brussels-1049
entr-hydrogen@ec.europa.eu

Our date: 2006-09-14
Our contact: Roxana Lesovici
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Dear Sir,

RE: Stakeholder consultation on preliminary draft proposal on hydrogen-powered motor vehicles

Norsk Hydro (Hydro) welcomes the opportunity to present its views on the draft proposal on hydrogen-powered cars. Our company is actively involved in developing hydrogen as a future energy carrier, both in the hydrogen fuel market and distributed energy systems, through its Hydrogen Technologies unit.

Background

Hydro is a world-leading supplier of water electrolysis equipment and complete compression, purification, storage and gas handling systems for industrial applications, hydrogen fuelling stations and distributed energy systems based on on-site hydrogen production from electrolyzers. Over the past years, Hydro has supplied hydrogen fuelling stations to the following projects: CUTE Hamburg, CEP Berlin and ECTOS Reykjavik

In HyNor – the Hydrogen road in Norway -, Hydro supplies hydrogen to a fuelling station through a pipeline based on by-product hydrogen from the petrochemical industry. Hydro will be the owner and operator of the hydrogen fueling station. As Project manager for the HyNor project, Hydro is actively involved in the acquisition of hydrogen-fuelled vehicles. Currently we have a series of 15 Toyota Prius converted to hydrogen operation by Quantum Technologies that are being imported to Norway. It is in these circumstances that we have gained practical experience on type approval of hydrogen cars.

General comments to the preliminary draft proposal

During our ongoing work with certification and approval of hydrogen vehicles within the HyNor project, we experienced first-hand the lack of a European regulation for hydrogen vehicles. The absence of such a regulation makes the design and certification process today complicated and costly. This is especially noticeable on type-approval and testing of hydrogen components.

We welcome the European Commission initiative to launch consultations on possible European regulation for type approval of hydrogen-powered vehicles. We also pleased to see the component-oriented approach which forms the foundation for this proposal.

However, we think it is necessary to ensure that future regulations, especially requirements relating to the type approval of hydrogen components, are as close as possible to the ongoing international work within the International Standardization Organisation (ISO) and other international standardisation efforts. Any future EU legal requirements should be in compliance with ISO

standards for hydrogen containers. In our opinion, this will provide a level-playing field for European manufacturers on a global scale.

The preliminary proposal does not specify the actual test requirements but suggest these will be established through the comitology procedure, taking into account international standardisation work. We hope that this principle will be integrated in the final regulation and its annexes.

While not a direct manufacturer of hydrogen-powered cars, through its experience in the field, Hydro is always available to support the European Commission in its preparation of this proposal.

Yours faithfully,
for Norsk Hydro SA



Roxana Lesovici
EU Affairs Manager

Further information can be obtained from:

Ulf Hafsel
Manager
Hydro Oil & Energy, Markets
Tel: + 47 2 253 21 52
Email: Ulf.Hafsel@hydro.com

Roxana Lesovici
EU Affairs Manager
Corporate EU Affairs
Tel: +32 2 774 84 07
Email: Roxana.Lesovici@hydro.com