

European Commission

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## Norwegian Hydrogen Forum's recommendations for the revised public procurement directives

Norwegian Hydrogen Forum (NHF) is the national members' association for hydrogen and hydrogen-based derivatives in Norway. Its approximately 100 members represent the entire hydrogen value chain, from producers via distributors to end users, including industry, technology suppliers, public authorities and academia. NHF promotes its members' interests towards public authorities and decision makers and works actively to disseminate key information on hydrogen as an indispensable climate solution.

We appreciate the invitation to submit recommendations for the upcoming revision of the public procurement directives. NHF supports the overall ambition to make public procurement a tool for strategic investment and to simplify rules. Furthermore, we have the following recommendations.

### Use public procurement as a tool to achieve decarbonisation

Using public procurement practices to achieve decarbonisation targets will contribute significantly to innovation, technology development and industrial competitiveness in Europe. NHF therefore strongly recommends that the new legislative framework incentivises public procurement practices that require climate gas emission reductions and improved environmental impact throughout the value chain.

For several years, Norway has used public procurement strategically to reduce climate and environmental impact and to contribute to faster innovation cycles in industry. Since 2024, there has been a general requirement to weigh climate and environmental impact 30 % in all public tenders.

The Norwegian Public Roads Administration's ambitious procurement practices have accelerated the development and deployment of hydrogen technologies in Norway. In 2023, MF Hydra became the world's first hydrogen ferry to come into operation in the Ryfylke area in Western Norway. Two further ferries will come into operation in Northern Norway in late 2026.

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Environmental requirements in the Norwegian Public Roads Administration's asphalt contracts have also led to investments in hydrogen-fuelled bulk vessels. The technology and expertise developed from these first projects are contributing to further market maturation. For example, Viking Cruises has ordered two cruise ships which can be fuelled with liquefied hydrogen from delivery in 2026 and 2027. Samskip has chosen Norwegian Hydrogen to deliver liquefied hydrogen to their two SeaShuttle vessels that are due to come into regular operation between Oslo and Rotterdam in spring 2027. This marks the establishment of the first complete value chain for liquefied hydrogen in Europe.

### **“Made in Europe” criteria must include EEA countries**

Norway is fully integrated into the European single market through its membership in the European Economic Area (EEA), and Norwegian companies contribute significantly to European energy and industrial value chains. Among others, our members play important roles in establishing hydrogen trade routes in Northern Europe, in facilitating decarbonisation of hard-to-abate industries, and in delivering strategic technologies such as electrolyzers, storage tanks, fuel cell applications, bunkering technology, as well as research excellence and safety competence. To ensure the competitiveness of both Norwegian and European industry, it is therefore vital that any “Made in Europe” criteria include Norway and the EEA countries.

With kind regards,  
Norwegian Hydrogen Forum

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