

**Public Consultation on the  
Guiding Principles for ENNOH  
Rules of Procedure on the  
Consultation of Stakeholders**  
**Evaluation of Responses**

## Introduction

ENNOH will be established on a non-profit basis to promote the development and proper functioning of the internal market for hydrogen and cross-border trade and to ensure the optimal management, coordinated operation, and sound technical evolution of the European hydrogen transmission network. Hereby, ENNOH fulfils the obligation of hydrogen transmission network operators (HTNOs) to cooperate at the Union level as defined in the EU Regulation [*H<sub>2</sub>&Gas Decarbonised Market Package*]. In order to successfully execute its tasks, ENNOH relies on the active participation and input of a wider stakeholder group, such as network users, other infrastructure operators, NGOs and civil society.

According to that EU Regulation [*H<sub>2</sub>&Gas Markets Decarbonisation Package*], ENNOH is required to carry out a number of tasks and deliver a certain output, including an annual work program, draft network codes and a Union-wide Ten-year Network Development Plan for hydrogen. ENNOH is required by the same regulation to conduct extensive public consultations on a number of processes, at early stages and in an open and transparent manner.

In the context of its work, ENNOH will seek input from stakeholders and from other relevant entities. When this document refers to consultations, it should be interpreted as a wider process for obtaining input, not limited to a particular formal procedure e.g. written consultation.

ENNOH aims to conduct these consultations in accordance with relevant EU legislation and principles, best practices and guidelines established by other bodies (e.g. ACER, CEER) and organisations (e.g. ENTSO-E, ENTSOG, EU DSO body)

ENNOH will facilitate that parties interested in the tasks performed by the ENNOH will have the opportunity to get involved in these consultative processes.

## Public Consultation

A group of (future) HTNOs is intensively working on the ENNOH foundational process. On 30<sup>th</sup> of August, they submitted to ACER and the Commission the draft statutes, a list of members and draft rules of procedure, including the rules of procedure on the consultation of stakeholders, of the ENNOH to be established. For the sake of clarity and accuracy, this cooperative structure of (future) HTNOs could be labelled as pre-ENNOH until the official foundation of ENNOH takes place around Q3 2025.

On 16 April, a hybrid external public workshop was held in Brussels. On that day, stakeholders had the opportunity to learn more about ENNOH and how ENNOH planned to engage with and consult with market stakeholders in the future. The materials presented on that day are publicly available [here](#).

On 7 May 2024, a [public consultation](#) was announced on the ENNOH's website, and direct e-mails were sent to the stakeholders inviting them to contribute to this consultation. Furthermore, the launch of the public consultation was publicised on [ENNOH's LinkedIn profile](#) and disseminated through social networks by different stakeholders.

The consultation document outlined the draft principles that ENNOH would develop in its rules of procedure to articulate the stakeholder involvement processes. The consultation also included overviews of ENNOH's structure and its Articles of Association (AoA). It was explicitly

## *Evaluation of Responses to the Public Consultation on the Guiding Principles for ENNOH RoPs on the Consultation of Stakeholders*

mentioned that all responses would be published on the ENNOH website ([www.ennoh.eu](http://www.ennoh.eu)), unless marked as “confidential.” This publication would include a list of respondents' names.

Stakeholders were able to submit their contributions until the 31st of May, the official deadline for the consultation.

An "Evaluation of Responses" document is made available, summarising how stakeholders' input was incorporated by way of short summaries of aggregated responses.

In executing this consultation, the HTNOs committed to adhering to the General Data Protection Regulation (GDPR) and sought consent to contact and process individuals' personal information. All the contributions received will be used for the sole purpose of preparing the draft ENNOH RoP on the Consultation of Stakeholders. More details about ENNOH's privacy policy or how to subscribe to future consultation events can be found on ENNOH's website.

## Responses

By the end of the consultation period, 8 responses were received including:

- one confidential response from a market participant
- a non-confidential response, sent on behalf of a group of 6 NGOs.
- 4 responses from EU Industry associations
- 2 responses from two different individual companies

This evaluation paper summarises all comments received in an aggregated manner and outlines the Pre-ENNOH responses to those contributions. The table below is organised according to the different sections identified in the feedback template, and Pre-ENNOH's response clarifies the extent to which their comments have been considered.

Pre-ENNOH highlights that it might have re-elaborated the text of some observations for the sake of brevity and clarity. Pre-ENNOH strove to respect the content of the responses provided, but to avoid any possible misunderstanding arising from summarising the observations received, the names of the respondents are not explicitly provided in the table below. For transparency reasons, full access to the original and non-confidential responses to the public consultation, including the name of the stakeholder, is provided on the ENNOH's website.

Respondent's views	Pre-ENNOH answer
<b>Part 1: Guiding Principles for RoP on Consulting Stakeholders</b>	
<b>General Comments</b>	
<p>The general comments highlighted the importance of transparency, inclusiveness, and regular dialogue in the consultation process. Feedback emphasised the need for a transparent and inclusive approach, advocating for a comprehensive external stakeholder consultation process that adequately represents all relevant parties. There was a call for establishing a regular dialogue with stakeholders to maintain ongoing engagement and for recommendations to align processes with industry standards and best practices. The importance of a structured consultation approach was acknowledged, with support for regular dialogue. Additionally, there is a call for a systematic and inclusive consultation process.</p> <p>NGOs suggest clarifying that the list of deliverables subject to public consultation in the consultation document was not exhaustive and that ENNOH would consult on other deliverables. They underlined the need for consultations on issues related to the European hydrogen market's development and assessments, particularly regarding hydrogen needs and its market expansion beyond hard-to-decarbonise sectors.</p>	<p><a href="#"><u>Answer 1</u></a></p> <p>As complementary to the provisions detailed in the consultation document, Pre-ENNOH agrees on the following:</p> <ul style="list-style-type: none"> <li>● the importance of transparency, regular dialogue, inclusiveness and alignment with industry standards and best practices.</li> <li>● Regarding the list of deliverables included at the end of the consultation document, pre-ENNOH agrees with the NGOs that this list is non-exhaustive. ENNOH is committed to conducting public consultations on that list of deliverables, but without being exclusively limited to that list, and including deliverables mentioned in the regulation that might cover the hydrogen market's development and related assessments.</li> </ul>
<b>Scope and Objectives of ENNOH Consultation</b>	
<p>Respondents emphasised the importance of detailed explanations of the consultation's scope and objectives to ensure clarity and understanding among stakeholders. One respondent highlighted the need to align and assess the technical information provided during the consultation to effectively meet stakeholder needs. It was suggested that ENNOH should leverage its experience to define the scope and objectives, enhancing the overall effectiveness of the consultations.</p> <p>Additionally, there was a recommendation to ensure the scope and objectives of regulatory practices comply with the best available practices, including the Strategic Environmental</p>	<p><a href="#"><u>Answer 2</u></a></p> <p>As complementary to the provisions detailed in the consultation document, Pre-ENNOH agrees on the following:</p> <ul style="list-style-type: none"> <li>● Build <u>regular and trusted relationships</u> over the long term with stakeholders.</li> <li>● <u>Detailed Explanations and Clarity</u>: Future consultations should be well planned in advance, and they should include concise documents or presentations that explain the scope and objectives. These consultations will align with ENNOH's broader goals outlined in the EU Regulation.</li> </ul>

Respondent's views	Pre-ENNOH answer
<p>Assessment (SEA) Directive (2001/42/EC) and the Environmental Impact Assessment (EIA) Directive (2011/92/EU amended by 2014/52/EU). There was a request to include diverse stakeholders, such as consumer advocacy groups, environmental NGOs, academia, industry representatives, and civil society, to ensure a broad range of perspectives.</p> <p>It was recommended to implement mechanisms to provide stakeholders with essential background information ahead of time, facilitating informed participation.</p> <p>Additionally, the suggestion to hold an initial, more open input session could help engage NGOs and other stakeholders with limited capacity by presenting less detailed information and facilitating initial feedback.</p> <p>In cases where feedback from relevant stakeholders is insufficient for different reasons (e.g. lack of capacity), ENNOH should work proactively with its key stakeholders to facilitate their feedback.</p>	<ul style="list-style-type: none"> <li>• ENNOH may hold <u>preliminary sessions</u> or workshops to walk stakeholders through the consultation process and address any questions or uncertainties they might have. These introductory workshops would help stakeholders provide initial feedback and develop their understanding to provide a better-quality response.</li> <li>• <u>Alignment and Assessment of Technical Information</u>: For specific consultations, ENNOH could review and align technical information with the stakeholders, possibly setting up a dedicated workshop and/or appointing a liaison contact person to ensure relevance, alignment and clarity.</li> <li>• <u>Continuous improvement and leveraging ENNOH's Experience</u>: ENNOH will use past experiences and best practices to improve future consultations. This includes reviewing previous consultations, identifying what worked well, and addressing barriers to participation. ENNOH will also assess the two directives mentioned (SEA and EIA) to decide whether and how practices from these texts could be used for public consultation.</li> <li>• <u>Addressing Lack of Input from Relevant Stakeholders</u>: ENNOH will contact key stakeholders who have not provided input and whose contributions are key to a given consultation process.</li> </ul>
<b>When to consult?</b>	
<p>Respondents provided detailed guidance on the optimal timing and circumstances for ENNOH's stakeholder consultation. The guidance emphasised the importance of consulting stakeholders during the initial phases of drafting key legal documents to ensure a comprehensive collection of industry insights and concerns.</p> <p>Furthermore, it was suggested that a follow-up round of consultations be conducted once a preliminary draft is available, enhancing the consultation process's depth and effectiveness.</p>	<p><a href="#"><u>Answer 3</u></a></p> <p>As complementary to the provisions detailed in the consultation document, Pre-ENNOH agrees on the following:</p> <ul style="list-style-type: none"> <li>• The <u>importance of early engagement</u> and consultation with stakeholders during the initial phases of drafting key legal documents.</li> <li>• <u>Continuous engagement with stakeholders</u>: after running a consultation process, a second round of</li> </ul>

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<p>The feedback also outlined specific operational experiences and practices, such as those from ENTSG, which suggested that consultations should be continuous, engaging stakeholders early and often across various activities and especially during crisis situations, like the Energy Crisis post-February 2022.</p> <p>A response highlighted the necessity of stakeholder involvement in nearly all processes to ensure well-rounded decision-making. Additionally, it was recommended that the duration of consultations should not be less than three weeks to allow sufficient time for stakeholder preparation and feedback, ideally avoiding public holidays and vacation periods like August to ensure maximum participation.</p> <p>NGOs suggested committing to organising consultations before any significant regulatory changes, ensuring early stakeholder involvement to enhance trust and transparency. The existing vague criteria for when consultations should occur need clarification and additional clarifications are needed on the specific conditions under which additional consultations are warranted, particularly for issues impacting the hydrogen market. Moreover, the practice of informal consultations should be structured, and notes from those informal consultations should be documented and published on ENNOH's website.</p> <p>Additionally, the establishment of a more accessible and regularly updated website is suggested to keep stakeholders informed, with updates proposed to be scheduled at least monthly or bimonthly. The Annual Work Program (AWP) should detail the areas of work for the year, specifying which will involve consultations, and providing clear timelines and objectives for these engagements. Lastly, it is recommended that ENNOH's consultation practices adhere to the principles of the Strategic Environmental Assessment (SEA) Directive, which highlights the critical role of public participation in environmental decision-making, thus ensuring that all consultations are conducted openly and transparently.</p>	<p>follow-up consultations might sometimes be necessary to be arranged after a preliminary draft is made available. ENNOH also acknowledges that this continuous engagement is especially relevant during crises, as exemplified by practices from organisations like ENTSG. In fact, ENNOH could organise additional consultations for issues significantly impacting the hydrogen market.</p> <ul style="list-style-type: none"> <li>● <u>Aiming for a minimum consultation period</u>: ENNOH would aim to ensure a minimum consultation duration of three weeks. However, in duly justified urgent cases, it might be necessary to shorten this period.</li> <li>● <u>Avoid overlapping of the consultation process with public holidays and vacation periods</u>: In order to maximise participation and provide stakeholders with ample opportunity for preparing and providing good-quality and detailed feedback, ENNOH will aim to avoid overlapping with the main vacation periods. In the case of unavoidable overlapping, ENNOH will aim to extend the deadline, so that stakeholders have enough working days to prepare their respond.</li> <li>● <u>Enhance Transparency</u>: ENNOH will aim to implement the following the concrete measures proposed by the stakeholders: <ul style="list-style-type: none"> <li>○ Informal consultations with stakeholders during the consultation period are to be documented in an aggregated manner and made accessible on ENNOH's website.</li> <li>○ Revamping ENNOH's website to make it more user-friendly after the ENNOH official foundation. This website would offer information on the consultation processes, which will be updated when needed and not later than bimonthly to keep all stakeholders well informed.</li> <li>○ the Annual Work Program (AWP) will detail the areas of work for the</li> </ul> </li> </ul>

Respondent's views	Pre-ENNOH answer
	<p>upcoming year, clearly indicating which projects will involve consultations and outlining specific timelines and objectives for each.</p> <ul style="list-style-type: none"> <li>○ As suggested by some respondents, ENNOH will assess the principles of the Strategic Environmental Assessment (SEA) Directive, emphasising public participation in environmental decision-making, to decide whether and how practices from that text could be incorporated into ENNOH public consultations.</li> </ul>
<b>Whom to consult with?</b>	
<p>The input received highlighted the importance of including a broad and diverse range of stakeholders in the consultation process. Respondents emphasised the need to involve all relevant stakeholders, such as those directly impacted by hydrogen production and technology, including off-takers, producers, and technology providers. This comprehensive approach would ensure that the consultation would capture the perspectives and insights from all key players in the industry, which is essential for informed decision-making and robust policy development.</p> <p>Several respondents underscored the importance of extending consultations beyond professional associations to include local communities, customers, and other groups affected by ENNOH's activities. This approach was presented not only as a way to broaden the scope of feedback but also to promote transparency and inclusivity, ensuring that the voices of those indirectly affected by the policies and procedures are heard and considered. Engaging with a wide array of stakeholders was considered helpful in identifying potential issues and fostering community support for ENNOH's initiatives.</p> <p>Additionally, there was a strong call to enhance stakeholder engagement by including civil society organisations and environmental groups in the consultation process. These groups often</p>	<p><a href="#">Answer 4</a></p> <p>As complementary to the provisions detailed in the consultation document, Pre-ENNOH agrees on the following:</p> <ul style="list-style-type: none"> <li>● <u>Broad Stakeholder Inclusion</u>: We appreciate the emphasis on including <u>all</u> relevant stakeholders in the ENNOH consultation processes. ENNOH will ensure that its consultation process actively engages these key players by establishing regular communication channels and stakeholder meetings.</li> <li>● <u>Expanding Beyond Professional Associations</u>: We acknowledge the importance of consulting a wider audience, including local communities, customers, market participants and other affected groups. To address this, ENNOH will expand its outreach efforts to include all of them. This approach will enhance transparency and ensure that ENNON deliverables consider the perspectives of those directly and indirectly impacted by them, fostering broader support and understanding.</li> <li>● <u>Engaging Civil Society and Environmental Groups</u>: ENNOH recognises the valuable perspectives that civil society organisations and environmental groups bring to the table.</li> </ul>

Respondent's views	Pre-ENNOH answer
<p>provide critical perspectives on sustainability and environmental impact, which are increasingly important in the context of energy and hydrogen production. By consulting with these organisations, ENNOH would ensure that its policies align with broader environmental and societal goals, ultimately contributing to more sustainable and socially responsible practices.</p>	<p>To incorporate their feedback, ENNOH will invite those interested organisations to participate in the consultations, ensuring their views on sustainability and environmental impact are heard.</p>
<b>How to consult?</b>	
<p>The input received outlined several important strategies to enhance the consultation process effectively. Respondents emphasised the necessity for ENNOH to maintain a regular and structured dialogue with stakeholders. This could be achieved by distributing detailed questionnaires, establishing open feedback channels, and organising targeted meetings. These methods would facilitate a comprehensive gathering of diverse opinions and insights, ensuring that all relevant perspectives are considered in the consultation process.</p> <p>Several stakeholders highlighted the importance of transparent and systematic feedback mechanisms. They recommended that ENNOH should present a thorough assessment of the feedback received, detailing how stakeholders' inputs have been considered and incorporated into the decision-making process. This level of transparency would build trust among stakeholders and demonstrate ENNOH's commitment to accountability and responsiveness. By clearly showing how feedback influences decisions, ENNOH could foster a sense of ownership and participation among stakeholders, encouraging more active and meaningful engagement in future consultations.</p> <p>Furthermore, there was a strong advocacy for leveraging digital tools and platforms to enhance the efficiency and accessibility of the consultation process. The use of online surveys, virtual meetings, and interactive platforms could significantly broaden participation, especially from stakeholders who might face geographical or time constraints. This approach would ensure</p>	<p><a href="#">Answer 5</a></p> <p>Apart from all the provisions detailed in the consultation documents, Pre-ENNOH agrees on the following:</p> <ul style="list-style-type: none"> <li>• Establish a <u>regular and structured dialogue</u> with stakeholders, including market participants. ENNOH will assess whether and how the Aarhus Convention principles in consultation materials can be incorporated to ENNOH's public consultation processes.</li> <li>• Enabling a <u>user-friendly submission of contributions</u> by allowing stakeholders to provide thorough input, not restricted to online questionnaires only, but also enabling the possibility for attachments (background documents) or via participation in workshops and targeted meetings. The consultations will clearly detail how the different input/contributions can be provided.</li> <li>• Set a <u>clear schedule</u> for any consultation process and communicate this to all stakeholders to ensure their continued engagement and participation.</li> <li>• <u>Leverage Digital Tools</u>: ENNOH will invest in digital tools and platforms to facilitate consultations. ENNOH will aim to ensure that these tools are user-friendly, reaching a broader audience and making participation more accessible. ENNOH would also provide support for stakeholders who may be less familiar with digital technologies and might need technical assistance. ENNOH will enable a web-based application with registered access for</li> </ul>



Respondent's views	Pre-ENNOH answer
<p>that the consultation process is inclusive and adaptable to the needs of a diverse stakeholder base. Digital tools could also streamline the collection and analysis of feedback, making it easier to manage large input volumes and provide timely responses to stakeholders.</p> <p>To enhance the consultation process, several key recommendations were made.</p> <ul style="list-style-type: none"> <li>● Firstly, facilitate access to scientific and technical expertise for stakeholders, providing up-to-date research and expert consultations to support evidence-based contributions.</li> <li>● Regularly evaluate the consultation process for continuous improvement based on feedback and best practices. Hold periodic feedback sessions to gather input on improving the consultation process and report back on how feedback is addressed.</li> <li>● Clearly define and publish the criteria for "the limited number of the main affected stakeholders" which will be part of the drafting committees, allowing for objections and inclusion requests. In this sense, a clear mechanism for stakeholders to raise concerns about excluded key stakeholders was requested, such as a formal objection process or review panel.</li> <li>● Reference the Aarhus Convention principles in consultation materials to emphasise ENNOH's commitment to public rights regarding information access, participation, and justice.</li> <li>● Frame consultation questions broadly to include related topics and avoid a narrow focus.</li> <li>● Clarify the format of public consultations, ensuring transparency, especially for oral feedback and "other suitable formats." Ensure that the right stakeholders are informed about consultations, addressing the composition and volume of stakeholder responses.</li> <li>● Proactively involve NGOs, consumer groups, academia, and other stakeholders in</li> </ul>	<p>stakeholders, offering electronic forms for submitting and publishing written contributions.</p> <p>The web-based application will not preclude respondents from submitting a background document (e.g. an e-mail or letter), which could be uploaded alongside the online response to complement and better explain their position. The ENNOH Transparency Platform (as requested by the Regulation) will also provide valuable data (including maps) to help stakeholders prepare their contributions.</p> <ul style="list-style-type: none"> <li>● <u>Keeping a balanced approach in workshops</u>: ENNOH might organise stakeholder workshops to receive input from stakeholders. In preparing for this workshop and inviting presenters, ENNOH should proactively seek a balanced participation and involvement of different groups of stakeholders.</li> <li>● <u>Follow-Up Actions</u>: ENNOH will plan follow-up actions and keep stakeholders informed about the progress and outcomes of the consultation. ENNOH will regularly evaluate the effectiveness of the consultation processes and make necessary adjustments based on stakeholder feedback and best practices. This ensures continuous improvement and responsiveness to stakeholder needs.</li> </ul> <p>There were two explicit <u>requests for membership to the Drafting Committee and the SJWS</u>. Pre-ENNOH is not, at this stage, in the condition to guarantee membership in these groups to any stakeholder/entity. The composition of the Drafting Committees and the SJWS will be discussed once ENNOH is founded and will follow the rules described in the EU Regulation. The EU Regulation clearly foresees that the Drafting Committee will have a limited number of relevant stakeholders. Different Network codes could require different stakeholders since</p>

Respondent's views	Pre-ENNOH answer
<p>workshops to balance participation and mitigate conflicts of interest.</p> <ul style="list-style-type: none"> <li>● Provide timely, accurate data through a dedicated website with a precise map of hydrogen infrastructure to facilitate proper consultation input despite uncertainties and last-minute changes.</li> </ul>	<p>the field of expertise required for each Network Code could change substantially. (e.g. Balancing NC and Cybersecurity NC). The composition of the Drafting Committees will be determined through a transparent and objective process. Clear and inclusive criteria for selection will be outlined to ensure that the Drafting Committee is composed of the most appropriate stakeholders. Those stakeholders who apply for membership in the drafting committee and are not selected will receive a communication from ENNOH explaining the reasons for that decision.</p>
<b>How ENNOH will respond to the consultation?</b>	
<p>Respondents emphasised the need for ENNOH to provide clear and timely feedback to stakeholders on how their input has been considered and integrated into decision-making processes. This feedback should include specific details on the changes made as a result of the consultation and an explanation of why certain suggestions were not adopted.</p> <p>Additionally, transparency and accountability were identified as key themes. Stakeholders suggested that ENNOH should publish comprehensive reports summarising the consultation responses and the rationale behind the decisions. A robust feedback mechanism is also recommended, where stakeholders are individually informed about how their input was used or why it was disregarded, potentially through follow-up reports or meetings. These reports should be accessible to all stakeholders to ensure that the process remains open and transparent. Moreover, it was mentioned that the outcomes of the consultation should be well-documented in accordance with the SEA Directive</p> <p>Lastly, some respondents recommended the establishment of a structured follow-up process where stakeholders can continue to provide input and receive updates on the</p>	<p><a href="#">Answer 6</a></p> <p>The provisions detailed in the consultation documents are considered to be aligned with the responses received. On top of that, ENNOH agrees with the following:</p> <ul style="list-style-type: none"> <li>● ENNOH will <u>clearly document and communicate consultation outcomes</u>, detailing how stakeholder input was considered. <ul style="list-style-type: none"> <li>○ ENNOH could assess the SEA Directive on transparency in environmental planning to decide whether and how its principles could be incorporated into its public consultation processes.</li> <li>○ ENNOH will provide clear guidance on how stakeholder comments will be evaluated and integrated.</li> </ul> </li> <li>● <u>Create and publish an Evaluation of Responses</u> that aggregates stakeholder inputs and explains how these inputs have been incorporated into decision-making. This will show that the consultation process is a meaningful exercise that influences decision-making. <ul style="list-style-type: none"> <li>○ One of the responses suggested preparing individually tailored</li> </ul> </li> </ul>

Respondent's views	Pre-ENNOH answer
<p>implementation of decisions. This ongoing engagement would help maintain trust and ensure that stakeholder concerns are continuously addressed throughout the policy implementation phase. The use of confidential information should be minimised.</p>	<p>responses for each respondent, explaining how their suggestions have (not) been inserted in the ENNOH deliverable. Pre-ENNOH believes that this would require an enormous workforce and time dedication, which an efficient ENNOH is not expected to have. It is, therefore, considered more efficient to develop a robust and well-developed Evaluation of Responses. This practice is commonly observed in other relevant bodies/associations (ACER, ENTSOG, ENTSOE, etc.) and represents a good balance between workload and accountability.</p>
<p><b>How to treat confidential information?</b></p>	
<p>Respondents supported the guiding principles described in the consultation document. They underlined the importance of handling confidential information with care and in accordance with GDPR and relevant data protection laws.</p> <p>It was recommended that confidential information be minimised and only used when absolutely necessary, and data providers should be reminded of the limited reasons for not publishing data.</p>	<p><a href="#">Answer 7</a></p> <p>The provisions detailed in the consultation documents are considered to be aligned with the responses received. On top of that, ENNOH agrees with the following:</p> <ul style="list-style-type: none"> <li>• <u>Guarantee confidentiality</u>: Confidential information may be shared to support the technical advice given to ENNOH. This information can be anonymised in ENNOH's assessments to protect its sources. ENNOH will guarantee that the information remains confidential while adhering strictly to GDPR and other relevant data protection laws.</li> <li>• <u>Minimised and well-managed confidential data</u>: ENNOH might provide clear guidelines to data providers about the reasons for not publishing certain data. This will help maintain a balance between transparency and confidentiality. ENNOH might also implement mechanisms to help stakeholders share confidential information in a way that supports transparency and trust.</li> </ul>
<p><b>How ENNOH will coordinate consultation with ACER and EC?</b></p>	
<p>To enhance the consultation process, it's recommended that ENNOH involves ACER and</p>	<p><a href="#">Answer 8</a></p>

Respondent's views	Pre-ENNOH answer
<p>the EC when relevant, as outlined in the legislation.</p> <p>This involvement should aim to prevent duplication through collaboration. Consulting ACER and EC is especially important when they have overlapping consultation obligations.</p> <p>Creating common data and response collection channels is advised to facilitate this process.</p> <p>Close coordination with ACER and EC is paramount for ensuring transparency, coherence, and alignment across regulatory frameworks, ultimately enhancing the consultation process's effectiveness.</p>	<p>The provisions detailed in the consultation documents are considered to be aligned with the responses received.</p> <p>In addition, pre-ENNOH would like to comment on the request to create common channels for data and response collection channels among ENNOH, ACER, and EC. While the reasoning behind this request is acknowledged, the technical and legal feasibility seems complicated since this would lead to three different entities (ENNOH, ACER, and EC) sharing common IT systems and access to information. ENNOH will keep however this idea in mind when exploring how to better streamline and simplify the collection of responses during future interactions with ACER and EC.</p>
<p><b>Part 2: General ENNOH's Overview</b></p>	
<p>The feedback received highlights that the document is too general and lacks specific details on ENNOH's tasks and organisational interactions. Concrete comments included:</p> <ul style="list-style-type: none"> <li>• More comprehensive information on tasks such as H2 leakage monitoring and market monitoring, along with the roles of different bodies and stakeholders, would provide a clearer picture of ENNOH's functioning.</li> <li>• Integrating renewable hydrogen into the energy system should focus on priority sectors that are hard to electrify and provide a balanced approach by involving all stakeholders in open consultations.</li> <li>• A joint website for sharing updated data and consultation information was recommended.</li> <li>• Additionally, ENNOH's objectives were requested to align with the EU's energy and climate goals and comply with relevant legislation.</li> </ul>	<p><a href="#"><u>Answer 9</u></a></p> <p>The AoA and RoP which are to be sent to ACER and EC not later than 1<sup>st</sup> of September will provide much higher level of detail on ENNOH that the consultation documents.</p> <p>ENNOH's objectives are clearly described in the Regulation. ENNOH is aiming for a flexible structure which allows for future adjustments, with a clear focus on transparency, inclusiveness, and effective stakeholder engagement.</p>

Respondent's views	Pre-ENNOH answer
<ul style="list-style-type: none"> <li>• The structure and processes within ENNOH need more clarity, especially regarding the general assembly, working groups, and director appointments.</li> <li>• The draft guiding principles should ensure transparency and inclusiveness, avoiding conflicts of interest, particularly with the fossil gas transport industry.</li> <li>• A flexible structure was recommended to allow future adjustments, with a clear focus on transparency, inclusiveness, and effective stakeholder representation.</li> </ul>	
<p><b>Part 3: ENNOH AoA – Draft Table of Content</b></p>	
<p>The feedback suggested that while the overview is complete, the document should provide more details on the functioning of the association, specifically defining the different working groups in the articles of association.</p> <p>Additionally, it was considered as important for the articles of association to be more detailed, including descriptions of voting rights and the decision-making process. The clear and transparent table of contents is appreciated for establishing an international non-profit association under Belgian law.</p> <p>Regarding ENNOH membership, it was requested that the rights of operators from countries that are candidates for EU membership and those participating in the Energy Community be expanded to facilitate their integration into ENNOH.</p>	<p><a href="#"><u>Answer 10</u></a></p> <p>The AoA and RoP, which are to be sent to ACER and EC no later than September 1st, will provide a much higher level of detail on ENNOH than the consultation document.</p> <p>Hydrogen transmission operators based in countries that are contracting parties to the Energy Community or EFTA will have the right to apply for ENNOH Observer membership.</p>

## Next Steps

The guiding principles for ENNOH's RoP on Consulting Stakeholders will be updated according to the evaluation of responses listed here above. These guiding principles will be duly followed when drafting ENNOH's draft statutes (AoA) and the RoP.

*Evaluation of Responses to the Public Consultation on the Guiding Principles for ENNOH RoPs on the Consultation of Stakeholders*

ENNOH will periodically review its RoP for Consultation of Stakeholders and update it based on the experience gained. This will reflect ENNOH's development over time and its commitment to continuous improvement and adaptation to stakeholder needs.