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Transparency International EU submits conflict-of-interest complaint to European Commission over hydrogen consultancy contract

Pia Engelbrecht-Bogdanov · Thursday, July 16th, 2026

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Transparency International EU, alongside the civil society organisations BankWatch, Corporate Europe Observatory, The Good Lobby and LobbyControl, have today submitted a joint complaint to the European Commission's Directorate-General for Energy (DG ENER) over its contracts with the consulting firm Guidehouse. According to a recent analysis by the research organisation ARIA, Guidehouse has a record of working with the H2eart for Europe alliance between January 2024 and at least October 2025. This alliance is a coalition of gas storage operators as well as fossil fuel companies that is focused on securing and scaling underground hydrogen storage projects in the EU.

Guidehouse has been contracted[1] by DG ENER to work on a project related to the European Hydrogen Bank auction while simultaneously working for gas storage operators and fossil fuel companies through H2eart for Europe. Our research shows that Guidehouse was ostensibly involved in promoting hydrogen storage as strategic assets on behalf of the alliance.

These circumstances may have compromised the independence and impartiality of its contracted work to the Commission on the implementation of the European Hydrogen Bank, which was funded through the Connecting Europe Facility – Energy (CEF-E).

This bears a potential professional conflict-of-interest risk in Guidehouse's consultancy role for DG ENER: Guidehouse has been involved in advising clients, including in matters related to accelerating the deployment of Hydrogen Storage Solutions, while at the same time advising the specific EU policy instrument designed to ensure the economic viability of these types of projects.

TI EU has therefore asked DG ENER confirm that its internal due diligence procedures thoroughly assessed Guidehouse's professional relationships, and to clarify what due diligence procedures is uses to prevent professional conflicts of interest in consultancy contracts as defined by the EU's financial regulations. We have also requested an urgent review of all contracts held with Guidehouse[2] in light of these potential professional conflicts of interest.

Raphael Kergueno, Senior Policy Officer at Transparency International EU, said:

> "The European Commission must act in the interests of EU citizens and the climate. Its contracting of a consulting firm with strong ties to the hydrogen sector when developing hydrogen-related policy calls that obligation into question. The Commission must urgently clarify how it came to this arrangement, and take all necessary steps to mitigate this potential conflict of interest."

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[1] FTS (budget) reference SI2.1865972 for a Study supporting the Commission in the development of auction design and necessary pre-conditions for a European import auction for renewable hydrogen under the European Hydrogen Bank. The project ran from 16/10/2024 until 15/07/2025

[2] Financial Transparency System 2024, reference (budget): SI2.1934934SI2,1834220SI2,1898900SI2,1865972SI2,1843418SI2,1898900SI2,1750544SI2 & 1631184

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