

European Commission
Directorate-General for Energy
Directorate B - Internal Energy Market
B.1 - Internal Market I: Networks & Regional Initiatives
To the attn. of Mrs Catharina Sikow-Magny - Head of Unit

Brussels, May 29th 2019

Re: Public consultation on the gas candidates for the 4th list of Projects of Common Interest

We, as civil society representatives, would like to use the opportunity of the ongoing public consultation on the energy projects being put forward to be part of the 4th Union List of Projects of Common Interest (PCI List) to share our **concerns regarding the proposal to prioritise new fossil gas infrastructure in these times of imminent climate crisis.**

For the reasons that you will find below, **we do not believe that any of the 112 new gas projects applying to be on this list deserve to receive the privileged status the PCI list provides:**

1) **Fossil gas, a climate enemy**

Natural gas is, just like oil and coal, nothing other than a fossil fuel. Like any fossil fuel, **fossil gas is a major contributor to climate change** with its inevitable and abundant CO₂ emissions during combustion and with its significant (though under-reported) emissions of methane all through its lifecycle, from extraction to transport and consumption. While some gas sources can at best cause slightly less carbon emissions than other fossil fuel sources, **they do not, even if methane emissions are completely ignored, provide the required climate benefits that would allow our society to respect the Paris Agreement that the European Union ratified in 2016.** Other sources of gas such as shale gas cause comparably bad or even worse emissions than oil or coal. Furthermore, developments in the gas market are adding new sources of emissions as increased trade in liquefied fossil gas (LNG) brings additional processes (liquefaction, increasing and longer transport by boat and regasification) that cause additional CO₂ and methane emissions. The Intergovernmental Panel on Climate Change (IPCC) in its Special report on Warming of 1.5°C made it very clear that if we want to have a decent chance of limiting temperature rise to 1.5°C, while dividing the efforts with some form of fairness for the developing world, **Europe would need to phase-out all fossil fuels, including gas, by 2030 to 2040.** This is why fossil gas cannot be considered as a solution to fight the climate crisis we are facing today. Investing in continued fossil gas use now does nothing more than rearrange the deck chairs on the Titanic. **In the name of its climate objectives, the EU should therefore stop supporting the construction of any new fossil fuel infrastructure.**

2) **The irony of associating fossil gas with energy security**

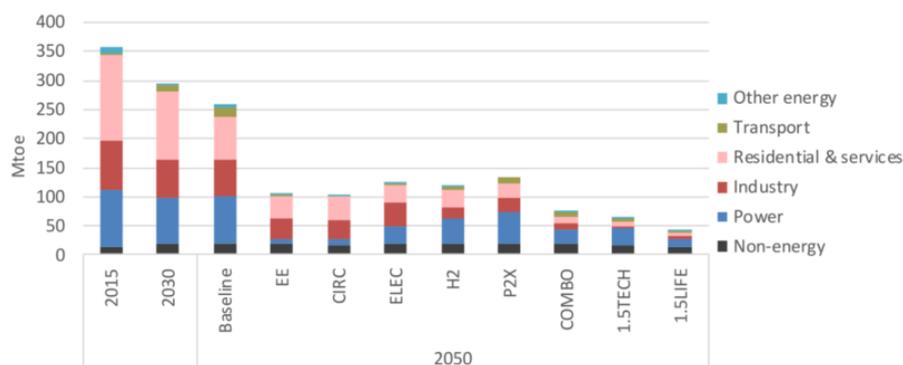
Ensuring energy security in Europe has been the main driver for discussions justifying new gas projects on the PCI list. While the objective with the PCI list has been to reinforce the gas system so Europe becomes more resilient to potential gas disruption cases (like what happened in 2006 and 2009 because of the tensions between Russia and Ukraine), there is still a **profound irony in associating fossil gas with energy security:**

- First, 'energy security', as it is understood in the PCI list context, does not include climate change while the **ongoing climate crisis (itself largely due to emissions coming from our fossil fuel addiction) is the source of major political, economic and social instability and insecurity** in many places around the world.
- Secondly, fossil gas investments and the **quest for new fossil gas resources are in fact the reasons for many geopolitical tensions and therefore insecurity within Europe**: the divisive Nord Stream 2 controversy, legal disputes between Hungary and Croatia over the acquisition of energy companies, reignited tensions between Cyprus and Turkey because of offshore gas discoveries, gas production in the closed Romanian gas market, and the construction of the Southern Gas Corridor associating the EU to the authoritarian Azeri and Turkish regimes, and cases of corruption and human rights violations are just a handful of examples illustrating this irony. Similarly, the manner in which Russia and the United States are willing to use their gas reserves as geopolitical weapons with Europe as their playground is another clear signal showing **how dangerous it is to consider fossil gas as a source of energy security**.
- **Several PCI gas projects also have energy and geopolitical insecurity repercussions beyond Europe**: The offshore gas reserves recently discovered in the Mediterranean Sea (supposed to benefit to Europe through the PCI EastMed pipeline) are adding even more fuel to the fire of the Israel-Palestine-Lebanon conflict. Similarly, according to information collected by ENTSOG, the PCI Krk LNG terminal intends to import some gas from Mozambique where big gas companies have been developing major gas projects (offshore gas production and new LNG terminals) in natural protected areas, displacing local populations, in a country already severely hit by climate change.

3) The risk of costly stranded assets

Fighting climate change necessarily means steeply reducing our dependence on fossil fuels in the years to come. That's why, in its 2050 long term strategic vision, the European Commission foresees a 20% decrease of fossil gas demand by 2030 and **could go down by 90% by 2050** (see graph).¹ These volumes cannot be replaced by the **limited potential of different forms of sustainable non-fossil gas sources**.² These 112 new gas projects (almost none of which are claiming to aim at transporting non-fossil gas supplies) therefore **do not reflect the declining volumes of gas, and seriously risk becoming stranded well before the end of their 40-50 year planned lifespan**. This is why, if the European Commission is serious about its climate objectives and about **avoiding the construction of future stranded assets**³, it should not allow any gas project candidates to be on the next PCI list (especially projects aiming at importing even more fossil gas to Europe).

Figure 28: Consumption of natural gas by sector



Note: "Residential and services" also includes agriculture.

Source: Eurostat (2015), PRIMES.

¹ <https://ec.europa.eu/energy/en/topics/energy-strategy-and-energy-union/2050-long-term-strategy>

² <https://www.theicct.org/blog/staff/renewable-gas-distraction-europe>

³ <https://www.euractiv.com/section/climate-strategy-2050/news/eus-canete-warns-gas-pipelines-risk-becoming-stranded-assets/>

4) A PCI process based on out-dated and biased information

The methodology developed to assess whether or not a gas project candidate should be included in the next PCI list is to a very large degree based on the background work done by **ENTSOG, representing the interests of the biggest European gas transmission system operators who happen to own 75% of the gas projects in the current PCI list.**⁴ ENTSOG provides all the models and projections that the European Commission and Member States use to decide on the needs to build new gas infrastructure. This leads to a situation in which **most parts of the PCI identification process cannot be perceived as independent to the interests of the gas industry.** ENTSOG's models further demonstrate a **significant bias as the projections continue to justify the construction of an almost never-ending list of new gas projects despite the rapidly changing policy environment putting downward pressure on gas demand.**⁵ These models are also now **outdated by perpetuating a fossil fuel based supply system beyond 2040, ignoring decarbonisation objectives and new technologies** (such as larger deployment of renewable energy sources, new energy efficiency objectives, new demand side responses, new storage capacities with batteries or green hydrogen, new non-fossil gas sources, etc.). On the contrary, the ever-increasing expansion of Europe's gas system, accelerated through **the PCI process does not accompany a transition away from fossil fuels but provides dangerous and costly market incentives in the opposite direction.** Furthermore, it is extremely worrying that one of the four pillars building the framework of the PCI process, market integration, security of supply, competition and sustainability, namely the latter, is nothing but hot air. **Since the drafting of the first PCI list, the PCI projects' impact on sustainability has never been subject to any serious analysis.** A PCI project's impact concerning total greenhouse gas emissions, including methane, and a stringent test against the Paris Agreement commitments has never been included, and should be developed immediately.

The current climate breakdown requires unambiguous action and unprecedented ambition to give us a chance at maintaining liveable temperatures. While the challenge to organise the needed phase-out of all fossil fuels is great, the European Union should at the very least stop investing in new fossil fuel infrastructure.

This is why **we, environmental, climate and social justice NGOs and groups of concerned citizens from all around the world demand that the European Union stops supporting the construction of new energy infrastructure which locks us into a prolonged addiction to fossil fuels, further reduces our chances at respecting our Paris commitments, and has ravaging direct and indirect environmental and geopolitical consequences outside of Europe.**

Signatories:

Pan-European organisations:

- Friends of the Earth Europe (Europe)
- Food & Water Europe (Europe)
- Climate Action Network Europe (Europe)
- Gastivists Collective (Europe)
- Counter Balance (Czech Republic / Europe)
- 350.org (Europe)
- Corporate Europe Observatory (Europe)
- CEE Bankwatch Network (Europe)
- Transport & Environment (Europe)
- EEB - European Environmental Bureau (Europe)
- Carbon Market Watch (Europe)
- Debt Observatory in Globalisation (Europe)
- Eco-Union (Europe)

European organisations and groups:

- GLOBAL 2000 (Austria)
- Attac Österreich (Austria)
- Zelena akcija/Friends of the Earth Croatia (HR)
- NOAH - Friends of the Earth Denmark (DK)
- EKOenergy (FI / Europe)
- Friends of the Earth Finland (FI)
- Les Amis de la Terre (FR)
- Collectif contre le gazoduc transfrontalier STEP (FR)

⁴ <http://www.foeeurope.org/hiding-plain-sight-gas-lobby-energy-policy-110517>

⁵ <https://cloud.foeeurope.org/index.php/s/BpNPCzdgBcn93Qc>

- Attac France (FR)
- Association PIERREDOMACHAL (FR)
- Réseau Action Climat (FR)
- En Commun 66 (FR)
- Urgewald (DE)
- Berliner Wassertisch (DE)
- FridaysforFuture Dithmarschen (DE)
- BI Gesundheit und Klimaschutz Unterelbe (DE)
- Bürgerinitiative gegen CO2-Endlager e.V (DE)
- IG Schönes Lünne (DE)
- Deutsche Umwelthilfe (DE)
- Bi lebenswertes Korbach (DE)
- Clean Air Action Group (HU)
- Keep Ireland Frack Free (IE)
- FÍS NUA (IE)
- Love Leitrim (IE)
- Safety Before LNG (IE)
- Climate Change Ireland (IE)
- Fossil Free TCD (IE)
- Not Here, Not Anywhere (IE)
- Friends of the Earth Ireland (IE)
- Legambiente (IT)
- Movimento No TAP Brindisi (IT)
- World Wild Fund Brindisi (IT)
- Comitati di Base Cobas Brindisi (IT)
- Comune di Melendugno, Lecce (IT)
- Associazione Bianca Guidetti Serra Puglia (IT)
- Comitato No Tap Salento (IT)
- Associazione Salento Km0 (IT)
- Legalità per il clima (rete di difesa legale del clima e analisi ecologica del diritto) (IT)
- Associazione "Ritorno alla Terra" (Corigliano d'Otranto - IT)
- ISDE - Associazione Italiana Medici per l' Ambiente (IT)
- Associazione MO.Bici (IT)
- Comitato No Metano Sardegna (IT)
- Comitato No Megacentrale Guspini (IT)
- Comitato Terra e Libertà Martano (IT)
- ARCI-Biblioteca di Sarajevo . Maglie (LE) (IT)
- Associazione Diritti a Sud, Nardò (LE) (IT)
- Green Liberty (LV)
- Milieudefensie / Friends of the Earth NL (NL)
- Both ENDS (NL)
- ASEED Europe (NL)
- Fossilvrij NL (NL)
- Fundacja Strefa Zieleni (PL)
- Eko-unia (PL)
- ZERO - Associação Sistema Terrestre Sustentável (PT)
- Academia Cidadã / Citizenship Academy (PT)
- Algarve Free Petroleum Platform/Plataforma Algarve Livre de Petróleo-PALP (PT)
- A ROCHA - Associação Cristã de Estudo e Defesa do Ambiente (PT)
- Almargem - Associação de defesa do património cultural e ambiental do algarve (PT)
- Glocal Faro (PT)
- GPS - Grupo Protecção Sicó, Pombal (PT)
- Movimento do Centro contra a Exploração de Gás" (PT)
- GEOTA - Grupo de Estudos de Ordenamento do Território e Ambiente (PT)
- Amigos de la Tierra (SP)
- Ecologistas en Acción (SP)
- InspirAction (SP)
- Plataforma Ciudadana Zaragoza sin Fractura (SP)
- Asociación de Cultura Popular Alborada, Gallur (SP)
- Plataforma por un Nuevo Modelo Energético (SP)
- Fossilgasfällan (SE)
- Jordens Vänner/Friends of the Earth Sweden (SE)
- Frack Free United (UK)
- UK Youth Climate Coalition (UK)
- Friends of the Earth England, Wales and Northern Ireland (UK)
- Frack Free York and Villages (UK)
- Eyes of Gaia (England)
- Talk Fracking (UK)
- Biofuelwatch (UK/US)
- Grandparents for a Safe Earth (UK)
- Salisbury Extinction Rebellion (UK)

Non-EU groups and organisations:

- Friends of the Earth Russia (Russia)
- SEE Change Net, Sarajevo (South East Europe)
- Platform for Gender Equality (Moldova)
- PENGON Friends of Earth Palestine
- JAIJustica Ambiental/Friends of the Earth Mozambique (Mozambique)
- Labour, Health and Human Rights Development centre (Nigeria)
- Les Amis de la Terre - Togo (Togo)
- Oil Change International (US)
- Friends of the Earth US (US)
- Alianza Mexicana contra el Fracking (Mexico)
- Friends of the Earth Australia (Australia)