



To:

Mr Frans Timmermans, Executive Vice-President of the European Commission,
Ms Kadri Simson, European Commissioner for Energy

Copy:

Ms Ditte Juul-Jørgensen, Director-General, DG Energy

Tuesday, 28 April 2020

Fossil free and nature-compatible Trans-European Energy Infrastructure

Dear Executive Vice-President Timmermans,
Dear Commissioner Simson,

The COVID-19 crisis has hit Europe hard. The European institutions and national governments are rightly putting their immediate focus on tackling the health and resulting economic crisis. A similar collective approach, based on scientific evidence, needs to be taken to tackle the climate crisis, which will still be here when society emerges from this pandemic.

Energy infrastructure is a key component in Europe's fight against climate change. Investments must exclude any continued or new support for infrastructure based on fossil fuels or incompatible with nature protection.

The revision of the ***Trans-European Energy Infrastructure (TEN-E)*** regulation will set the rules for Europe's future energy infrastructure, which should be the backbone of a successful energy transition ***in line with the Paris Agreement, the European Green Deal, the Climate Law, the Climate Neutrality objective by 2050¹ and Nature Directives.*** It must also take into account growing concerns of European citizens: three out of four Europeans consider climate change a very serious problem².

1) **Deliver fossil free and nature compatible infrastructure**

In order to deliver the 1.5°C objective, the EU must be fossil free and achieve climate neutrality by 2040 at the latest³. Energy infrastructure should neither become a bottleneck to the uptake of renewable energy nor should it deepen the EU's dependency on fossil fuels.

Recent research has shown that ***Europe's fossil gas infrastructure is shock resilient*** to potential security of supply disruptions. Additional investments into new gas infrastructure would create a fossil gas lock-in and result in unnecessary investments, including €29 bn in gas projects of common interest (PCIs) alone⁴. To achieve these goals, the revised TEN-E regulation should ***exclude all direct or indirect support to fossil fuel***

1 [European Council 12-13 December 2019](#)

2 European Commission (2020) – [Attitudes of European citizens towards the Environment](#)

3 [CAN Europe position on long term climate targets for the EU \(2018\)](#)

4 Artély's (2020) – [An updated analysis on gas supply security in the EU energy transition](#)

infrastructure. Support to repurpose existing infrastructure should only be provided to transport hydrogen (100% use) sourced from renewable electricity.

Infrastructure projects, including priority infrastructure, must also be assessed in line with Nature, Strategic Environmental Assessment and Environmental Impact Assessment Directives. There is a risk that fast-tracking procedures could compromise compliance with these legal requirements, and therefore attribution of priority status should be carefully examined for projects which might impact on sites or species which are protected for their nature or biodiversity value.

2) **Ensure independence and transparency in infrastructure governance**

Currently, only European Transmission System Operators, acting through ENTSO-E and ENTSO-G, are responsible for writing the Ten Year Network Development Plans (TYNDPs), which in turn largely define the selection of priority projects. This creates an unacceptable conflict of interest⁵ resulting in **high projections for future fossil gas demand⁶ and a lack of consideration of non-infrastructure solutions to energy needs.**

The future process for scenario development needs to build upon a consistent set of assumptions that take into account the **full range of energy solutions, both on the demand and supply sides**. These **independent and evidence based assumptions** would help ensure more efficient and more coherent infrastructure decisions, better aligned with the Paris Agreement, the EU's climate and energy objectives, and relevant nature and environmental legislation.


3) **Integrate energy efficiency first and 100% renewables principles**

Infrastructure planning should also **anticipate energy demand reduction** through stronger energy efficiency policies e.g. in the **buildings sector** and foster the use of **existing infrastructure more efficiently**. Demand side response measures coupled to distributed renewables, storage and digitalization will provide the required flexibility for a **100% renewable energy system**.

Hydrogen produced from renewables should only be used in those **sectors that are most difficult to decarbonize** (energy intensive industries, aviation) and should be sourced from **additional renewable** electricity generation.

We hope you will take our recommendations into consideration to revise the TEN-E Regulation and we would welcome the opportunity to organise a (virtual) meeting in order to discuss these proposals in more detail.

Yours sincerely,



Wendel Trio, director Climate Action Network Europe
on behalf of ClientEarth, Birdlife, Friends of the Earth Europe and Food and Water Action Europe.

⁵ Over 75% of CEF funding for gas PCIs has directly benefited ENTSO-G members. Calculations by Food & Water Action Europe based on [EU Commission data on the Connecting Europe Facility](#)

⁶ Electrification Alliance (2020) – [Comments on ENTOSs TYNDP 2020 scenarios](#)
EEB/CAN-Europe (2020) – [TYNDP scenarios need to become Paris-Agreement and EU Green Deal truly compatible](#)