

**24 May 2021**

Joint statement of  
Bulgaria, Croatia, Cyprus, Czechia, Greece, Hungary, Poland, Romania and Slovakia civil  
society organisations to their governments concerning fossil gas in the revised TEN-E  
Regulation:

## **Stop the expansion of fossil gas infrastructure**

We write to express our concerns regarding proposal<sup>1</sup> for the reintroduction of fossil gas in the revised trans-European infrastructure energy (TEN-E) regulation<sup>2</sup>. The European Union and the TEN-E must not facilitate investments in fossil fuel infrastructure.

We write ahead of the next EU Council meeting on 11 June, to urge you to act now to prevent the waste of public money on the expansion of the costly and already partly underutilized fossil gas infrastructure.

Fossil gas expansion, through the so-called Projects of Common Interest, or PCIs, that have privileged access to construction permits and public financing, stands in stark contrast to the urgent need to radically reduce our greenhouse gas emissions.

Fossil gas is a fossil fuel with catastrophic climate impacts, and not just due to its carbon dioxide emissions released during burning. It contributes to global warming before ever reaching the point of combustion. Methane emissions from fossil gas leak unburned at every stage from extraction to consumer, in sufficient quantities to make it an enormous climate danger.<sup>3</sup> While methane stays in the atmosphere for a shorter period than carbon dioxide, methane warms the planet by 86 times as much as carbon dioxide because of its higher potential to store heat, according to the Intergovernmental Panel on Climate Change. There is strong evidence that when the full life cycle is taken into account, fossil gas can have the same or even worse climate impact as other fossil fuels.<sup>4</sup>

According to a recent UN report, global methane emissions have continued to rise despite the recent economic turmoil, while cutting methane is the strongest lever and an urgent need if we

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<sup>1</sup> Joint comments from BG, CY, CZ, EL, HU, MT, PL, RO, SK on the inclusion of natural gas in the revised TEN-E Regulation, February 2021

<sup>2</sup> Regulation of the European Parliament and of the Council on guidelines for trans-European energy infrastructure and repealing Regulation (EU) No 347/2013

<sup>3</sup> All fossil gas used in the EU is intrinsically linked with methane emissions. When methane emissions amount to more than ~3% along the supply chain, there is no climate benefit of using fossil gas compared to oil or coal.

<sup>4</sup> European Commission, IN-DEPTH ANALYSIS IN SUPPORT OF THE COMMISSION COMMUNICATION COM(2018) 773, Available at:

[https://ec.europa.eu/clima/sites/clima/files/docs/pages/com\\_2018\\_733\\_analysis\\_in\\_support\\_en\\_0.pdf](https://ec.europa.eu/clima/sites/clima/files/docs/pages/com_2018_733_analysis_in_support_en_0.pdf)

are to slow climate change<sup>5</sup>. Following the report, UN chief, António Guterres, pleaded with world leaders to transition away from fossil fuels if we are to avoid falling into a climate abyss.

According to the International Energy Agency report, there is no space left for the expansion of fossil infrastructure in the world. *“The analysis reviewed all current and under-construction energy infrastructure around the world – and finds they will account for some 95% of all emissions permitted under international climate targets in coming decades.”*<sup>6</sup>

Furthermore, according to the European Commission, EU fossil gas consumption needs to decline considerably in the next decade, by 36% in comparison to the 2015 level, if the EU is to achieve its climate commitments<sup>7</sup>.

Just like in the rest of Europe, security of supply does not necessitate further expansion of costly fossil gas infrastructure in central and eastern Europe. Assessments of existing fossil gas infrastructure in Europe showed that the current network is sufficiently resilient to meet a variety of future gas demand scenarios in the EU, even in the event of extreme supply disruption cases.<sup>8</sup>

A recent report by Global Energy Monitor has revealed that planned public and private investments, worth 87 billion euros, would see the EU’s fossil gas import capacity actually increase by 35%, leading inevitably to stranded assets, to be borne by consumers.<sup>9</sup> In fact, even according to the latest EU expert agency opinion, investing now into new gas infrastructure risks creating many stranded assets because there is the lack of commitments from potential pipeline users to use these capacity increases<sup>10</sup>.

It has to be noted that even the current import capacity is underused. For example LNG terminals have been used to a less than to one half of their capacity (average utilisation rate of 46% for 2019 and 2020) according to the Food & Water report.<sup>11</sup>

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<sup>5</sup> UN, 2021, Global Assessment: Urgent steps must be taken to reduce methane emissions this decade, Available at: <https://www.unep.org/news-and-stories/press-release/global-assessment-urgent-steps-must-be-taken-reduce-methane>

<sup>6</sup> IEA, World Energy Outlook 2018, Available at: <https://www.iea.org/reports/world-energy-outlook-2018>

<sup>7</sup> The “2030 Climate Target Plan” suggests that European fossil gas use will reduce by [32-37% of final consumption by 2030](#) and all scenarios in the EU Long Term Strategy showed a significant decline for fossil gas by -60% to -90% until 2050

[https://ec.europa.eu/clima/sites/clima/files/docs/pages/com\\_2018\\_733\\_analysis\\_in\\_support\\_en\\_0.pdf](https://ec.europa.eu/clima/sites/clima/files/docs/pages/com_2018_733_analysis_in_support_en_0.pdf)

<sup>8</sup> Artelys, 2020, An updated analysis on gas supply security in the EU energy transition, Available at: <https://www.artelys.com/wp-content/uploads/2020/01/Artelys-GasSecurityOfSupply-UpdatedAnalysis.pdf>

<sup>9</sup> GEM, 2021, Europe Gas Tracker Report 2021, Available at: <https://globalenergymonitor.org/press-release/proposed-eu-gas-expansion-creates-e87-billion-stranded-asset-risk/>

<sup>10</sup> ACER, 2021, Opinion No 02/2021 of of 3 May 2021 on the ENTSOG draft Ten-Year Network Development Plan 2020, Available at:

<https://acer.europa.eu/Media/News/Pages/ACER-finds-serious-shortcomings-in-ENTSOs%E2%80%99-energy-network-plans.aspx>

<sup>11</sup> F&W, 2021, EU LNG Terminals in Figures: Import Capacities Still Underutilized, Available at: <https://www.foodandwatereurope.org/blogs/eu-lng-terminals-in-figures-import-capacities-still-underutilized/>

Spending taxpayer money now on fossil gas infrastructure necessarily means diverting investment from much-needed demand-side energy efficiency projects and fast deployment of sustainable forms of renewable energy.

Creating a renewables-powered energy system in Europe should not be reserved only for rich countries. No Europeans should be left behind in the EU's transition to a zero-carbon energy system. A secure and job-rich future can be ours - if we have the courage to grasp it.

We urge you to support measures that genuinely bring forward a just and swift energy transition aligned with the Paris Climate Agreement. We call on you to vote against the inclusion of fossil gas infrastructure into the revised TEN-E regulation.

Sincerely,

1. CEE Bankwatch Network,
2. Priatel'ia Zeme - CEPA, Slovakia
3. Extinction Rebellion, Slovakia
4. Spoločnosť ochrany spotrebiteľov (S.O.S.), Slovakia
5. Za Zemiata, Bulgaria
6. CEPTA - Centre for sustainable alternatives, Slovakia
7. Terra Hub, Croatia
8. Association Žmergo, Croatia
9. NGO "Eko-Zadar", Croatia
10. Friends of the Earth Cyprus, Cyprus
11. The Alliance of the Associations Polish Green Network, Poland
12. Institute for Political Ecology, Croatia
13. Stowarzyszenie Ekologiczne EKO-UNIA, Poland
14. Děti Země, Czech Republic
15. The Climate Collective, Greece
16. Pan, udruga za zaštitu okoliša i prirode, Croatia
17. WWF Adria, Croatia
18. Avli, Cyprus
19. ARION-Cetacean Rescue and Rehabilitation Research Center, Greece
20. Greenpeace Greece, Greece
21. Bankwatch Romania, Romania
22. Naturefriends Greece, Greece

23. Clean Air Action Group, Hungary
24. Energiaklub Climate Policy Institute and Applied Communication, Hungary
25. NESEHNUTÍ, Czech Republic
26. TERRA CYPRIA, Cyprus
27. Re-set: platform for social-ecological transformation, Czech Republic
28. The Green Tank, Greece
29. Centre for Transport and Energy, Czech Republic
30. Green Policy Institute, Bulgaria
31. WWF Greece, Greece
32. Brod Ecological Society-BED, Croatia
33. Mediterranean Institute for Nature and Anthropos, Greece
34. Society for sustainable development design, Croatia
35. CALLISTO, Wildlife and Nature Conservation Society, Greece
36. Ecological Institute Veronica, Czech Republic
37. ΤΟΥΛΙΠΑ ΓΟΥΛΙΜΗ, Greece
38. Hellenic Society for the Protection of Nature, Greece
39. Eko-Eko, Croatia
40. Scientists for Climate - Croatia, Croatia
41. ΔΡΑΣΗ ΓΙΑ ΤΗΝ ΑΓΡΙΑ ΖΩΗ, Greece
42. MEDASSET, Greece
43. Zelena akcija/Friends of the Earth Croatia, Croatia
44. Stowarzyszenie Pracownia na rzecz Wszystkich Istot, Poland
45. Zielony Instytut, Poland
46. Polish Ecological Club Mazovian Branch, Poland
47. Society for the Earth, Poland
48. 2 Celsius Association, Romania
49. WWF Romania, Romania
50. Declic, Romania