

To the attn. of Mr. Dominique Ristori - Director General, DG Energy

October 16th, 2017

**Re: Preparation of the 3<sup>rd</sup> Union list of energy Projects of Common Interest**

Dear Mr Ristori,

As discussions to design the **Third Union list of energy Projects of Common Interest (the PCI List) [1]** are nearing their end, we, European and international environmental and social NGOs, groups and associations, from 35 different countries in the world, are expecting the upcoming new list, a crucial component of the EU's climate and energy policy, to **adequately address all the implications of the ongoing climate change crisis, to incorporate recent commitments** made at the international level by the EU, to reduce Europe's dependency from overall imports and instead **better accommodate domestic renewables production**, and therefore to **end the support given to fossil fuel projects**. Only under these conditions can this list deserve its qualification of 'common interest'.

In 2016, we have seen **global warming of around 1.1 degree Celsius above pre-industrial levels [2]**, and climate change is already leading to increasingly severe impacts [3]. These impacts will get far worse unless immediate action is taken to cut the emissions of greenhouse gases which are causing climate change. The Paris Agreement [4] aims to keep warming to 1.5 degrees, but nations' pledges so far are likely to ensure warming of more than 3 degrees [5].

Hence, **increased ambition is urgently required**. As the European Court of Auditors recently stated, *"the EU's 2030 and 2050 emissions reduction targets and objectives will not be achieved without significant additional efforts"* [6]. As the majority of greenhouse gases come from the burning of fossil fuels (coal, oil and gas), it is essential to **phase them all out as quickly as possible and to stop encouraging investments in this sector**. If this phase-out does not start now, the cliff-shape emission reduction necessary to achieve EU's 2050 decarbonisation objective will become increasingly difficult.

The **PCI list needs to be the symbol of this longer-term vision that the EU should have for its future energy system, not its roadblock**. In that sense, the EU should stop promoting and support financially the construction of new fossil fuel infrastructure. The scientific community is absolutely clear about the fact that fossil fuels, gas included, are not compatible with a sustainable future. Despite the often-promoted idea that gas can be a bridge fuel, emissions for power from unabated gas are incompatible with power sector decarbonisation: for fossil gas combined-cycle plants, life-cycle emissions (taking into account the emissions in the fuel supply chain and the manufacturing of the energy conversion technology) are estimated at 410–650 gCO<sub>2</sub>eq/kWh [7]. In the current absence of a proven, mature and sustainable CCS technology to limit these emissions [10], **gas can therefore not be considered as a solution to contribute to the fight against climate change**. It is particularly true as regular peer-reviewed studies show that greenhouse gas emissions figures could be even greater [8] and that official inventories largely underestimate real volumes of emissions [9] of methane – a potent greenhouse gas which acts to warm the planet in addition to the carbon emissions from burning gas.

Gas is therefore everything but clean, and not just from a climate perspective: The shale gas boom in the US has shown the variety of systematic **environmental, water, social, health and negative economic impacts** that the gas industry activities can generate [11] and has led seven European countries to halt this technology. **Induced earthquakes** (and the 80.000 property damage claims) in the Netherlands have pushed the Dutch government to cap its production [12]. Gas production and the construction of mega-gas projects also very often come with their share of **corruption and human rights violations** (as witnessed with the Southern Gas Corridor [13] or in

Algeria and Nigeria), of **geopolitical tensions** (as it is happening with the Nordstream 2 project and with the connected Russia-Ukraine conflict) and of **violations of rights of Indigenous Peoples** (as observed with the Mapuche community in Argentina). **Europe being the (actual or potential) end consumer of all these supply chains, it cannot turn a blind eye to all these upstream impacts.**

Over the past decade, the European Union has already invested massively in new gas interconnections and import infrastructure while, at the same time, overall demand has fallen by almost 13% since 2010[14]. With gas import capacities more than twice as large as actual import needs [15], and with a 22% utilization rate of its LNG terminals' capacities over the past five years [16], the risk is high that most of the new investments made in that sector would become stranded. With their average lifespan of around 40 to 50 years [17], new projects are designed to last well beyond 2050 by when Europe is supposed, under the EU's current low-carbon economy roadmap, to be almost completely decarbonized. **The current level of resilience, diversification and density of the European gas grid [18], as well as the climate impact of gas, cannot justify that the next PCI list contains so many gas projects. Its number should be brought to zero.**

**As this will be the first post-Paris Agreement PCI list**, we strongly expect that the European Commission, Member States and energy Regulators will compose it with a **long-term vision, coherent with its climate objectives**. The investments we make today are the foundations of where we want to be in 2050 and greatly condition our ability to avoid catastrophic climate change. Adding even more gas capacities to the European gas grid can only slow down the integration of renewables and impede the implementation of the *efficiency first* vision by creating a new fossil fuel lock-in at the financial expense of truly sustainable demand side responses [19].

**Only when we stop providing support to the fossil fuel industry will the PCI list truly be a list of common interest.**

Yours faithfully,

Friends of the Earth Europe  
Food & Water Europe

On behalf of:

Pan-European organisations:

350.org  
BankTrack  
CEE Bankwatch Network  
Climate Action Network (CAN) Europe  
Corporate Europe Observatory  
Counter Balance  
Gastivists Collective

Green Budget Europe  
Health and Environment Alliance (EU)  
Justice & Environment  
Transport & Environment  
Young Friends of the Earth Europe  
WWF European Policy Office

International organisations:

EKOenergy (International)  
Friends of the Earth International

Oil Change International

European organisations/groups/associations:

Amigos de la Tierra (España)  
Asociación de Cultura Popular "Alborada", Gallur (Spain)  
Attac France  
Berliner Wassertisch (Germany)  
Both ENDS (Netherlands)  
Centar za životnu sredinu/ Friends of the Earth Bosnia and Herzegovina  
Clean Air Action Group (Hungary)  
Climaxi VZW - Friends of the Earth Flanders (Belgium)  
Climáximo (Portugal)

Collectif Arcois pour la Planète (France)  
Collectif Causse Méjean - Gaz de Schiste NON ! (France)  
Collectif Citoyen de Pézenas, Castelnau de Guers (France)  
Collectif Gaz de schiste Non merci ! Garrigue Vaunage, Gard (France)  
Collectif « NON au Gazoduc Fos Dunkerque » « NON à ERIDAN et MidCat » (France)  
Collectif stop au gaz de schiste Lavilledieu (France)  
Collectif Stop Gaz de Schiste Florac (France)  
EBC AURA (Eau Bien Commun Auvergne Rhône-Alpes) (France)

Ecologistas en Acción (Spain)  
eco-union (Spain) [i](#)  
Fossielvrij Onderwijs (The Netherlands)  
Fossil Free Trinity College Dublin (Ireland)  
Fossilgasfällan (Sweden)  
Friends of the Earth England, Wales and Northern Ireland  
Friends of the Earth Estonia  
Friends of the Earth Ireland  
Friends of the Earth Scotland  
Focus Association for Sustainable Development (Slovenia)  
Global 2000 (Austria)  
Global Witness (UK)  
Green Liberty (Latvia)  
Groundswell Gloucester (UK)  
Guernsey County Citizens Support on Drilling Issues (UK)  
IG Schönes Lünne (Germany)  
Jordens Vänner / Friends of the Earth Sweden  
Leave it in the Ground Initiative - LINGO (Germany)  
Legambiente (Italy)  
Les Amis de la Terre (France)  
Less Meat Less Heat (UK)  
Love Leitrim (Ireland)

*African organisations:*

Abibiman foundation (Ghana)  
Les Amis de la Terre Togo (Togo)  
Association Nigérienne des Scouts de l'Environnement (Niger)  
Environmental Rights Action/Friends of the Earth Nigeria

*North American organisations:*

350Brooklyn (US)  
Coalition Against the Rockaway Pipeline  
Columbus Community Bill of Rights (US)  
Concerned Citizens of Medina County, Ohio (USA)  
Concerned Health Professionals of New York (US)  
The Democracy Center  
Earth in Brackets (US)  
Earth Ethics, Inc

*Latin American organisations:*

CESTA / FoE El Salvador  
Hermanas de la Misericordia de las Américas - Comunidad de Argentina

*Asian organisations:*

Friends of the Earth Bangladesh  
Sahabat Alam Malaysia/Friends of the Earth Malaysia

*Australian organisations:*

Upper Mooki Land Care Inc (NSW Australia)

Maan ystävät - Friends of the Earth Finland  
Milieudefensie (Netherlands)  
Náttúruverndarsamtök Íslands (Iceland)  
NOAH - Friends of the Earth Denmark  
Not Here, Not Anywhere (Ireland)  
NSC-Friends of the Earth Hungary (Hungary)  
Plataforma Ciudadana Zaragoza sin Fractura (Spain)  
Plataforma Resposta al MidcAT (Spain)  
Platform (UK)  
PowerShift (Germany)  
PUSH Sweden  
Re:Common (Italy)  
REFEDD (France)  
Residents Action on Fylde Fracking (RAFF) (UK)  
Romania Without Them (RFE)  
Sandbag (UK-based environmental think-tank)  
Stop GHRM38 (France)  
The Hague Fossil Free (The Netherlands)  
Touche pas à mon schiste (France)  
Umweltinstitut München (Germany)  
Zelena akcija/FoE Croatia  
ZERO - Associação Sistema Terrestre Sustentável (Portugal)

Friends of the Earth Ghana  
GroundWork (South Africa)  
Justiça Ambiental / Friends of the Earth Mozambique

Fairmont, Minnesota Peace Group  
Food & Water Watch  
Friends of the Earth U.S.  
NEOGAP - Network for Oil and Gas Accountability and Protection, Ohio (US)  
New Brunswick Anti-Shale Gas Alliance (Canada)  
New York Climate Action Group  
Toxics Information Project, Rhode Island (US)

REDES-Amigos de la Tierra Uruguay

WomanHealth Philippines

---

[1] <https://ec.europa.eu/energy/en/topics/infrastructure/projects-common-interest>

[2] <https://public.wmo.int/en/media/press-release/wmo-confirms-2016-hottest-year-record-about-11%C2%B0c-above-pre-industrial-era>

[3] <https://public.wmo.int/en/media/press-release/climate-breaks-multiple-records-2016-global-impacts>

[4] [https://unfccc.int/files/essential\\_background/convention/application/pdf/english\\_paris\\_agreement.pdf](https://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf)

[5] <https://www.un.org/press/en/2017/sgsm18543.doc.htm>

[6] <http://www.eca.europa.eu/en/Pages/NewsItem.aspx?nid=8787>

[7] [http://climateactiontracker.org/assets/publications/briefing\\_papers/CAT-2017-06-16-DecarbonisationSeries-NaturalGas.pdf](http://climateactiontracker.org/assets/publications/briefing_papers/CAT-2017-06-16-DecarbonisationSeries-NaturalGas.pdf)

[8] <http://pubs.acs.org/doi/abs/10.1021/acs.est.6b05531>

[9] <http://www.nature.com/nature/journal/v538/n7623/full/nature19797.html>

[10] Even the gas industry doubts the technology will ever reach maturity: [https://consultations.entsoe.eu/system-development/joint-electricity-and-gas-consultation-build-the-e/user\\_uploads/160509\\_energy-scenarios-2040.pdf](https://consultations.entsoe.eu/system-development/joint-electricity-and-gas-consultation-build-the-e/user_uploads/160509_energy-scenarios-2040.pdf)

[11] <http://concernedhealthny.org/compendium/>

[12] <http://oilprice.com/Energy/Oil-Prices/The-Abrupt-Demise-Of-Dutch-Gas.html>

- [13] <http://globalmotion.pageflow.io/walkingtheline#37823>
- [14] Eurostat: [http://ec.europa.eu/eurostat/statistics-explained/index.php/Natural\\_gas\\_consumption\\_statistics](http://ec.europa.eu/eurostat/statistics-explained/index.php/Natural_gas_consumption_statistics)
- [15] [http://www.energyunionchoices.eu/wp-content/uploads/2017/08/E3G More security lower cost - Gas infrastructure in Europe-1.pdf](http://www.energyunionchoices.eu/wp-content/uploads/2017/08/E3G_More_security_lower_cost_-_Gas_infrastructure_in_Europe-1.pdf)
- [16] <https://alsi.gie.eu/#/>
- [17] <https://www.asktheeu.org/en/request/3156/response/11289/attach/2/LNG%20and%20gas%20storage%20strategy%20report%20of%20meeting%20with%20GIE%20yesterday.txt>
- [18] [http://www.energyunionchoices.eu/wp-content/uploads/2017/08/EUC\\_Report\\_Web.pdf](http://www.energyunionchoices.eu/wp-content/uploads/2017/08/EUC_Report_Web.pdf)
- [19] <http://www.energyunionchoices.eu/wp-content/uploads/2017/08/Safeguarding-energy-security-in-South-East-Europe-with-investment-in-demand-side-infrastructure.pdf>