

ON THE INSIDE: HOW THE GAS LOBBY INFILTRATES EU DECISION MAKING ON ENERGY

UPDATED TRANS-EUROPEAN ENERGY INFRASTRUCTURE (TEN-E) LEGISLATION IS SET TO GIVE AN OBSCURE GAS INDUSTRY BODY POWER OVER EUROPE'S ENERGY FUTURE. TIME TO CUT FOSSIL FUELS OUT OF OUR POLITICS.

2ND EDITION



#FOSSILFREEPOLITICS



**Friends of
the Earth
Europe**

**FOOD &
WATER
ACTION
EUROPE** 



2021 UPDATE:

NOTHING HAS CHANGED

The first edition of this briefing,¹ in summer 2020, showed how the trans-European energy infrastructure (TEN-E) regulation has placed an obscure body advocating for vested gas industry interests at the heart of EU decision making on energy. It demonstrated that the biased advice of the European Network of Transmission System Operators for Gas (ENTSO-G) to the European Commission helped its own gas industry members benefit to the tune of €1.1 billion euros in taxpayer subsidies. The paper called on the European Commission to revise the TEN-E regulation to fully replace ENTSO-G, with a transparent, independent body free of all fossil fuel interests.

Since then, the European Commission (EC) has published its proposals to revise the TEN-E regulation. However, despite vocal civil society criticism of the involvement of the gas industry in Europe's energy infrastructure planning, the proposed role of ENTSO-G is still as prominent and problematic as ever.

The EC announced the TEN-E proposal with the comment "this is an evolution, not a revolution". But, when it comes to the high level role the fossil fuel industry is given in deciding on Europe's future energy infrastructure, there is no change.

The new TEN-E proposal is still based on rolling out large energy infrastructure projects that preserve the primacy of the fossil fuel industry. The proposals do little to bolster the transition to integrated community-led renewable energy, energy efficiency, and climate justice. Of biggest concern, the inherent conflict of interest at the heart of the infrastructure selection process is not addressed. This, despite the fact that the old TEN-E has so far overseen severe delays, abandoned projects, and the waste of 440 million euros of EU taxpayers money on gas projects which have been cancelled or are highly unlikely to ever start operating.²

We face a climate emergency in which Europe has just years to wean itself off our addiction to fossil fuels. The EU Green Deal necessitates a profound transformation of our energy system. But the TEN-E draft proposal is clearly not getting us there.

The fossil fuel industry should not be in charge of defining what the EU energy system needs. This briefing calls for a firewall to end fossil fuel industry access to decision-makers, starting with the TEN-E regulation. We continue to call for the replacement of ENTSO-G by a transparent, independent body free of all fossil fuel interests.

ACKNOWLEDGEMENTS

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1 <https://friendsoftheearth.eu/wp-content/uploads/2020/11/Briefing-How-the-gas-lobby-infiltrates-EU-decision-making-on-energy.pdf>

2 <http://www.globalwitness.org/wastedgascash>

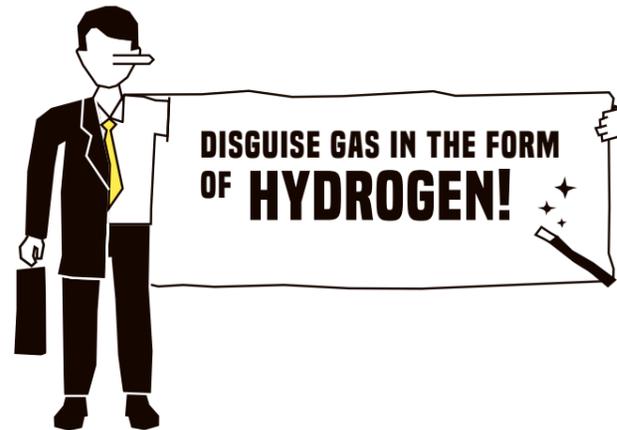
INTRODUCTION



NEW EU ENERGY INFRASTRUCTURE LAW: EVOLUTION = BUSINESS AS USUAL



1 DRAFT EU ENERGY INFRASTRUCTURE PLANS AND OVERESTIMATE THE NEED FOR GAS



2 SMUGGLE IN FOSSIL GAS BY MAKING IT SEEM "CLEAN" AND SIDELINE HOW IT HEATS THE PLANET



3 SIT ON PANELS WITH EU DECISION-MAKERS IT'S NOT CONSIDERED A LOBBY

**CONTINUE
FOSSIL FUEL-BASED
BUSINESS
AS USUAL**



What is ENTSO-G?

The European Network of Transmission System Operators for Gas (ENTSO-G), established under EU law in 2009, brings together Europe's gas pipeline companies to advise the European Commission on energy infrastructure.

ENTSO-G is a body established through EU legislation. But in reality it is an industry association, representing the interests of its 44 member companies, most of which run national gas transmission systems in EU member states.

Many of the members are international players in the energy sector, whose business model is based on building out the EU gas network. They have a financial interest in expanding their operations, and the EU's gas market – and in some cases, they belong to larger international oil and gas companies.

One of ENTSO-G's key activities is putting together Ten-Year Network Development Plans. Produced every two years, these plans lay out ENTSO-G's vision of the evolution of Europe's gas infrastructure over the next ten years. Despite the requirement to have a more holistic approach to network planning by involving ENTSO-G's electricity counterpart ENTSO-E since 2018³, the various scenarios developed are not compatible with the Paris climate agreement, nor with the EU's climate and energy targets.⁴

A lobby for gas

In its EU transparency register declaration, ENTSO-G states that "ENTSO-G is a non-profit association and does not have the mission to represent its members, collectively or individually". However, ENTSO-G is not independent of its members: both its board and the staff come from its members (for more see below, *Who is ENTSO-G really?*). We have seen recent evidence of ENTSO-G joining forces with the gas lobby to send a lobby letter arguing that significant investment from the EU COVID-19 recovery stimulus funds should go to the gas industry⁵. Between January and April 2020, ENTSO-G had several meetings with Energy Commissioner Kadri Simson and her cabinet regarding the expansion of the gas market⁶. As recently as June 2020, ENTSO-G co-signed a lobby letter with the gas industry, pushing for the upcoming EU Hydrogen Strategy to also include hydrogen derived from fossil fuels, banking on unproven greenwashing solutions like negative emission technologies.⁷ ENTSO-G also repeated its wishes to keep gas in the TEN-E in its recent proposals for the TEN-E revision.⁸

3 <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex%3A32013R0347>

4 <https://www.pac-scenarios.eu/tyndp-review.html>

5 <https://www.entsog.eu/sites/default/files/2020-04/Joint-letter-Covid-19-Recovery-plan.pdf>

6 <https://lobbyfacts.eu/representative/9a7838bfa382480e80f3e769035e678f/european-network-of-transmission-system-operators-for-gas>

7 <https://www.politico.eu/wp-content/uploads/2020/06/Hydrogen-Letter-to-President-von-der-Leyen-20200624.pdf>

8 https://www.entsog.eu/sites/default/files/2020-12/entsog_proposals_TEN_E_revision_201127.pdf

What's in the Commission's proposal to revise the TEN-E?

The European Commission in December 2020 issued new proposals to reform the EU rules for selecting energy infrastructure projects for financial and regulatory support - the so-called TEN-E regulation.⁹ While the proposals plan to remove direct support for fossil gas projects proposals, the EC still puts the gas transport industry, precisely the European Network of Transmission System Operators for Gas (ENTSO-G), centre stage in the process to select priority energy infrastructure. With small exceptions and cosmetic changes the mandate given to the industry body is still the same.

ENTSO-G, the body created by EU legislation is itself actively lobbying to remain at the heart of EU legislation while expanding its power towards false solutions:

“ENTSOG is ready to take on the role of the Hydrogen TSO [transmission system operators] association which would be efficient in terms of time, expertise, cost and delivery. ENTSOG is committed to delivery of the needed EU-wide hydrogen infrastructure, starting already with TYNDP 2022”¹⁰

The EC proposal for TEN-E is moving in a good direction by excluding the fossil gas infrastructure category. This means that ENTSO-G, representing the fossil gas transport industry, is being granted a central role in selecting infrastructure for anything but fossil gas. It is questionable why this role is not given to an independent body with a holistic understanding of an integrated, future-proof energy system, rather than to a body whose members are in competition with an energy system aligned with the EU Green Deal.

The current process to define priority projects for the next infrastructure priority list (the 5th PCI list) gives a flavour of the risks of giving the gas transport industry power over defining priority projects that contribute to the EU Green Deal. While in the recent past, big fossil gas projects have been promoted via ENTSO-G without any mention of e.g. hydrogen, we now see the very same projects presented as a possible solution to carry hydrogen. Two thirds of the project descriptions on the proposed list now include a potential future use as a hydrogen carrier. In this way, ENTSO-G shows that it is superficially shifting to “hydrogen readiness” - in order to avoid an important discussion about creating stranded fossil fuel assets. For ENTSO-G, keeping their pipelines occupied with gas or hydrogen means maintaining - rather than decommissioning - the costly and dense gas grid consumers pay to build and maintain. However, this conveniently ignores the climate impact of hydrogen from fossil fuels. And that the existing gas flows are not adapted to the potential needs of dedicated hydrogen infrastructure.

It is clear that hydrogen is being used as a green veneer to justify further build out of the European gas network, ultimately benefiting the gas transport industry. This is despite the fact that fossil-based forms of hydrogen (which make up more than 99% of the hydrogen today) are not in line with climate goals.

This conflict of interest has to stop. ENTSO-G is too partial and too conflicted to be in charge of defining what the EU energy system needs. With ENTSO-G in the new TEN-E regulation, it falls far short of the promised evolution, and instead promises fossil gas stagnation.

⁹ https://ec.europa.eu/energy/sites/ener/files/revised_ten-e_regulation_.pdf

¹⁰ ENTSO-G position paper on the TEN-E revision: https://www.entsog.eu/sites/default/files/2020-12/entsog_proposals_TEN_E_revision_201127.pdf

The following summary of the many shortfalls and problems around ENTSO-G should be a cautionary tale. We need a fossil-free TEN-E, and a fossil-free process to pick energy projects of genuinely common European interest.

BOX 1: OPPOSITION TO ENTSO-G INVOLVEMENT - IGNORED?

For years, NGOs and other representatives of civil society have been voicing concern over ENTSO-G's close involvement in the selection process for priority energy projects (PCI lists) and the many gas projects they pushed forward. Just recently, a coalition of NGOs submitted a joint position paper urging the EU Commission to cut ties with the fossil gas transport industry and select projects the EU really needs,¹¹ a demand that has been repeated before and since. After a public consultation on the 4th PCI list in 2019 by the European Commission, the report summarizes that concerning gas projects “almost all contributions (more than 99%) received negative feedback.”(see Figure)¹² The respondents never received information whether this signal had any impact on the process, but the results speak for themselves: the final priority list still contained over 55 fossil gas projects.¹³ Even the EU Ombudswoman opened an inquiry on sustainability issues around the gas PCI project selection.¹⁴ The Ombudswoman concluded that the sustainability of fossil gas projects had not been properly assessed. ENTSO-G was responsible for drafting a methodology to assess projects' sustainability - and true to form, ENTSO-G found that each and every fossil gas project would have a positive impact on sustainability. All this at a time when the just transition away from fossil fuels is an urgent planetary priority.

It causes disbelief among civil society that the EU Commission is willing again to put the fossil gas industry, represented by ENTSO-G, centre stage in the new regulation for Europe's future energy infrastructure. It is unacceptable for the EU to put the fossil fuel industry, one of the biggest roadblocks to a just transition, at the heart of EU laws crucial for defining our energy future.



Caption: EU Commission presentation of gas PCI public consultation findings, 27 June 2019

¹¹ https://www.foodandwatereurope.org/wp-content/uploads/2020/07/FFP_We-need-a-fossil-free-TEN-E-regulation_July2020.pdf

¹² https://ec.europa.eu/info/sites/info/files/energy_climate_change_environment/gas_candidate_pcis_-_consultation_summary.pdf

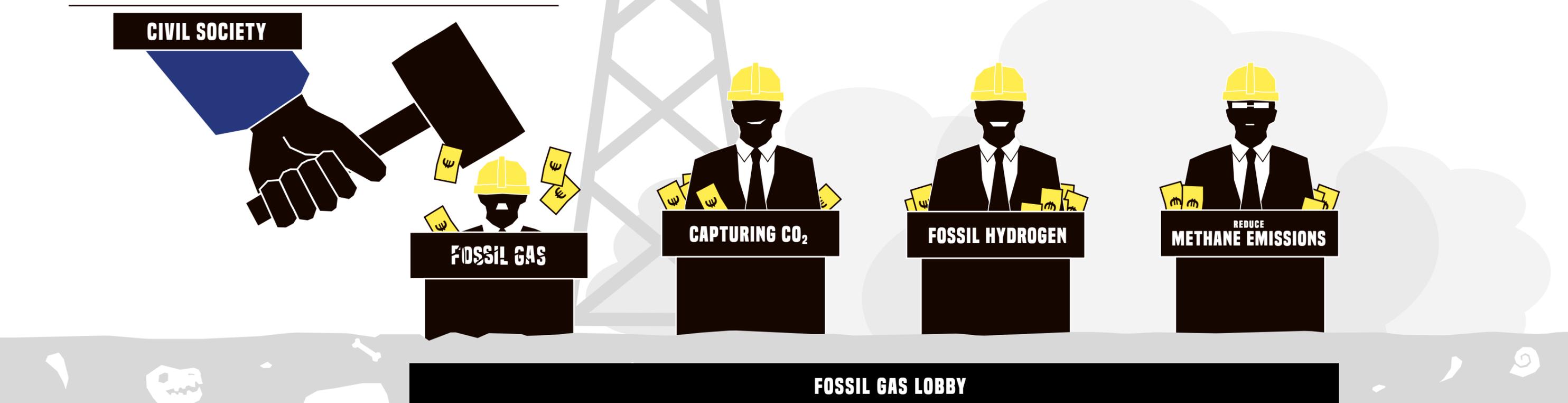
¹³ <https://www.forbes.com/sites/davidrvetter/2020/02/17/europe-behind-on-green-targets-greenlights-55-fossil-fuel-projects/?sh=30dc24fa6780>

¹⁴ <https://www.ombudsman.europa.eu/en/decision/en/135095>

¹⁵ The presentation was uploaded on the CIRCABC portal but is not available under the original link anymore.

CAPTURING TAXPAYERS FUNDS

PUTTING THE FOSSIL FUEL LOBBY IN CHARGE = FOSSIL SOLUTIONS WHAC-A-MOLE



Gas industry's cash cow

The EU law for selecting energy infrastructure projects for priority development is the 'trans-European energy infrastructure' (or TEN-E) regulation. This controversial regulation has created a system of institutionalised lobbying, whereby the European Commission asks ENTSO-G to determine how much new infrastructure will be needed in Europe.

The TEN-E regulation has put, and risks continuing to put, the gas industry in a position to justify building dozens of new pipelines - including by inflating its estimation of the future gas demand¹⁶ and tweaking cost-benefit analysis¹⁷ to tip the balance in favour of gas projects. With all the hype around hydrogen and other "green" gases ENTSO-G looks likely to continue promoting mega pipelines for gas based on unrealistic estimates for hydrogen and biogas.

16 https://www.foeeurope.org/sites/default/files/extractive_industries/2017/entso-g_fossil_free_europe_report_vfinal.pdf

17 https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2019-2019%20on%20Gas%20PCI%20list.pdf P.11

ENTSO-G is heavily involved in the selection of EU priority gas infrastructure projects. These so-called 'projects of common interest' (PCIs), benefit from a range of support. PCI projects receive accelerated permitting procedures and streamlined environmental impact assessments. They are also eligible to receive EU taxpayer funding under the Connecting Europe Facility (CEF).

Since the CEF was set up in 2013, the European Commission has spent €3.7 billion on European energy infrastructure projects. 40 percent, or €1.5 billion, of the fund's spending has been awarded to fossil gas projects.¹⁸ Of those CEF funds spent on gas infrastructure, ENTSO-G members' own projects have received 75 percent or over €1.1 billion. Moreover, projects connected to ENTSO-G's 12-strong board alone were awarded at least €913 million, or 60 percent of all CEF funds spent on gas infrastructure.

Fossil gas projects selected on the PCI list have access to further sources of EU subsidies too. The European Investment Bank and the EU's European Regional Development Fund have also heavily subsidised gas projects. From these, ENTSO-G

18 https://ec.europa.eu/inea/sites/inea/files/cefpub/cef_energy_supporting-actions_2020-web.pdf

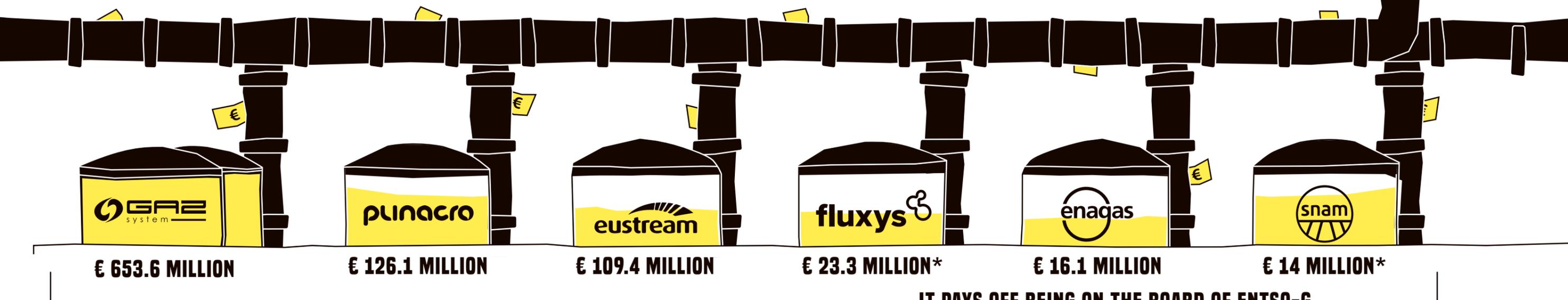


members' projects have received an additional €2.9 billion.¹⁹ Under the revised TEN-E regulation, it might not be fossil gas projects, but big infrastructures for hydrogen or biogas, swallowing billions of EU money. But a real alignment with the 1.5 degree target and the goals of the EU Green Deal, as well as an accurate appraisal of available volumes of truly sustainable gases, would mean that these infrastructures will likely stay empty.

Europe's well-connected gas network already has substantial over-capacity. Existing EU gas infrastructure is sufficiently capable of meeting a variety of future gas demand scenarios in the EU27, even in the event of extreme supply disruption. It is welcome that the new TEN-E draft foresees an end to supporting fossil gas projects. The regulation should not, however, help gas network operators organized in ENTSO-G to continue a costly buildout of the gas grid for gases like biogas and hydrogen. The EU should not be complicit in helping ENTSO-G avoid much needed discussions around the cost of the gas grid that Europeans carry, nor the need to decommission parts of this costly network as part of the just transition. Giving the gas transport industry a crucial role in the TEN-E risks setting Europe up to fail to transition beyond gas.

Europe does not need to build new fossil gas infrastructure. Europe's well-connected gas network already has substantial over-capacity. Existing EU gas infrastructure is sufficiently capable of meeting a variety of future gas demand scenarios in the EU28, even in the event of extreme supply disruption cases.²⁰ Europe needs to rapidly scale down dependence on fossil gas to meet its Paris Climate Agreement goals. Moreover new gas projects often go against the wishes of local communities.²¹

SUBSIDISING FOSSILS: EU AWARDS VAST FUNDS TO MEMBERS OF THE ENTSO-G BOARD²¹



IT PAYS OFF BEING ON THE BOARD OF ENTSO-G

¹⁹ <https://globalwitness.org/pipedown>

²⁰ <https://www.artelys.com/wp-content/uploads/2020/01/Artelys-GasSecurityOfSupply-UpdatedAnalysis.pdf>

²¹ for further information on subsidies given to ENTSO-G members for fossil gas project, please see <https://friendsoftheearth.eu/publication/on-the-inside-how-the-gas-industry-infiltrates-eu-decision-making-on-energy/>

SUBSIDISING FOSSILS

ENTSO-G's biased guidance to the European Commission has helped ensure the PCI process, and the CEF funding attached to it, is fossil fuel friendly, and mega-infrastructure friendly. Out of the CEF funds spent on energy projects since 2013, approximately 40 percent, has gone to the gas industry.²²

ENTSO-G has proven that it cannot be trusted not to abuse the PCI process for its own good. Two examples show how far ENTSO-G has been willing to go to make its unnecessary gas projects look clean and strategic:

- » By ignoring the importance of methane emissions from gas, a highly potent greenhouse gas, and comparing fossil gas projects with the dirtiest possible alternatives, ENTSO-G managed to reach a positive climate assessment for each and every fossil gas project that applied for PCI priority status.²³ An approach like this risks leaving the door in the future TEN-E open for hydrogen and other gas projects which are not in line with the Paris Agreement.
- » In order to define the future needs of Europe's gas system, ENTSO-G looked at gas demand peaks. However, its assessments over-inflate gas demand by assuming that gas demand peaks in all EU countries at the same time - a situation which would never happen in reality. This was used by ENTSO-G for years to justify the need for spending on more pipelines, import terminals and compressor stations, and there is nothing indicating that ENTSO-G would change this course under the new TEN-E regulation.

EU TAXPAYERS' MONEY



*Split with other companies

²² https://ec.europa.eu/inea/sites/inea/files/cefpub/cef_energy_supporting-actions_2020-web.pdf

²³ https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2019-2019%20on%20Gas%20PCI%20list.pdf P. 28

BOX 2: A “NEW” TEN-E? THE FOSSIL GAS TRANSPORT INDUSTRY ONCE AGAIN AT CENTER STAGE

After years of strong pressure by civil society, the EU Commission finally decided to revise the outdated infrastructure regulation which gave such ample powers to ENTSO-G. High-ranking EU officials acknowledged the need for a change of the process.²⁴ The draft law proposed few changes that will make a difference in the process. Nothing in the draft law takes power away from ENTSO-G, the very same body that has been busy building an energy system incompatible with the EU Green Deal.

The legislation:

- still leaves it up to ENTSO-G to draft the network plan which is the base for priority projects (eligible for political and financial support);
- still ensures ENTSG is responsible for drafting scenarios on which the network plan is based - these scenarios have consistently assumed exaggerated gas demand;²⁵
- still allows ENTSG to draft the methodology on how costs and benefits of projects will be analysed.

The raison d'être of ENTSO-G and its members is to operate and expand the fossil gas grid. However, with the revised TEN-E regulation planned to remove support for “classic” fossil gas projects, it is remarkable that ENTSO-G would still have such an ample role - or any role at all. This rings alarm bells for many. It means that ENTSO-G will still be able to use its statutory influence to promote false solutions which keep support for fossil gas in the end. Whether it be blending hydrogen with gas, fossil-gas based hydrogen, “hydrogen-ready” pipes which carry fossil gas, or fossil gas with the promise of capturing CO₂.

It will now be up to EU member states and parliamentarians to remove the privileges ENTSO-G enjoys to define our energy future.

²⁴ Then Deputy Director General Klaus Dieter Borchardt said in an interview: “With the revision of the TEN-E, we have made a large stakeholder consultation with many different stakeholders saying that the position of the Entsos is too strong because they are bundling their membership interests, and this does not necessarily reflect the European interest. This is therefore the first point where we would seek advice from independent parties when it comes to the methodologies.” <https://www.investigate-europe.eu/de/2020/klaus-dieter-borchardt-deputy-director-general-energy-it-is-not-for-the-commission-to-decide-anything/>

²⁵ <https://windeurope.org/policy/joint-statements/comments-from-the-electrification-alliance-on-the-entso-e-and-entso-g-draft-tyndp-2020-scenario-report/>



WHO IS ENTSO-G REALLY?

Many of ENTSO-G's members are international players in the energy sector, with a financial interest in expanding their operations - and in some cases, they belong to larger international oil and gas companies.²⁶

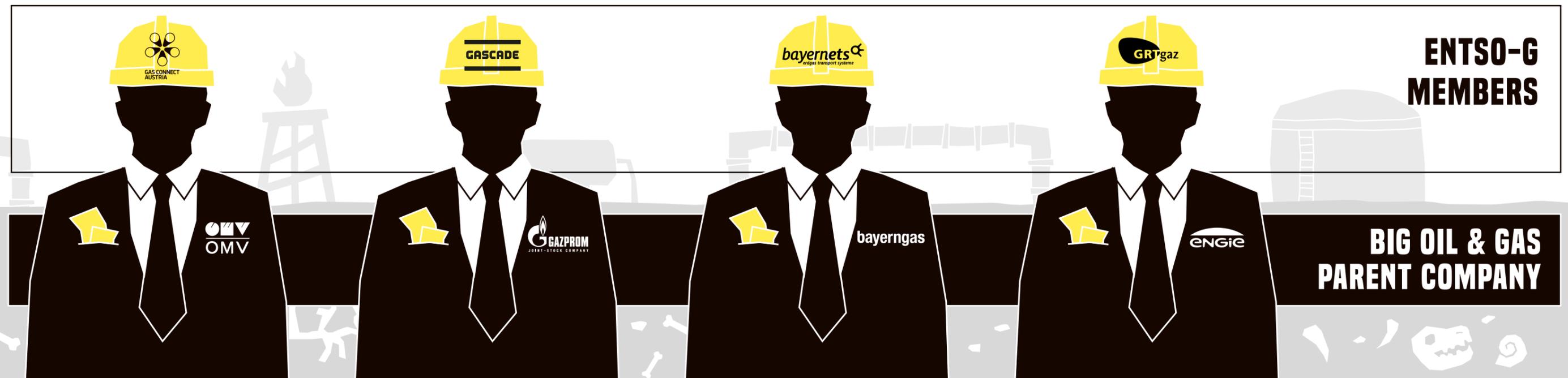
For example, German member GASCADE Gastransport GmbH is part-owned by Russian giant Gazprom. French member GRTgaz is owned by French energy company Engie. Austrian member Gas Connect Austria is predominantly owned by the oil and gas company OMV and Snam. Bayernets GmHB is mostly owned by gas extraction company Bayerngas. ENTSO-G's activities are governed by a 12-strong, all-male, board, drawn from its member associations and presided over by Stephan Kamphues, the chair of member company Open Grid Europe (formerly E.ON Gastransport). Other board members include representatives from Enagás, Italian gas transporter SNAM, Polish GAZSYSTEM, Belgian company Fluxys, the UK's National Grid Gas, French company GRTgaz, Romanian Transgaz and Hungarian FGSZ.²⁷

If you're a gas infrastructure company, it pays to be a member of ENTSO-G. Its members benefited disproportionately from the PCI list so far. Not all transmission system operators or companies involved in building gas projects are members of ENTSO-G. But ENTSO-G members have received 75 percent of all public funding allocated to the PCI list through the CEF, 60 percent to its board alone.

Companies represented on the board of ENTSO-G have received hundreds of millions of euros (alone or in group projects) in public subsidies from CEF alone.²⁸

It is concerning to see the EU not only plans on keeping ENTSO-G at the core of the revised TEN-E but apparently considers replicating the 'ENTSO-G model' (a body created to advise the EU that's in fact representing industry interests) for other areas. The leaked EU hydrogen strategy laid the foundation for the 'clean hydrogen alliance' which may fulfil a similar role as ENTSO-G for planning hydrogen infrastructure.²⁹ Also for planned EU-level methane legislation, the EU Commission plans to rely on the biggest gas polluters to define, among other things, methods to measure methane emissions from fossil gas.³⁰ The EU will never reach climate neutrality, let alone honor the Paris Agreement, if it replicates the same mistakes over and over again.

WHO IS ENTSO-G REALLY? ENTSO-G REPRESENTS SOME LARGE OIL AND GAS COMPANIES



26 <https://odg.cat/en/publication/who-owns-pipelines/#:~:text=Snam's%20majority%20shareholder%20is%20CDP,an%20inter%20municipal%20holding%20company>

27 <https://www.entsog.eu/structure>

28 For more information and detailed numbers of CEF money given to project promoters, see http://www.foeeurope.org/sites/default/files/corporate_capture/2020/briefing_-_how_the_gas_lobby_infiltrates_eu_energy_policy.pdf

29 "Sound infrastructure planning, such as on the basis of ten year network development plans (TYNDP), is needed on the basis of which decisions to invest can be taken." - Draft [19 June] EU Commission Communication "building a hydrogen economy for a climate-neutral Europe. A strategic roadmap."

30 <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12581-Proposal-for-a-legislative-act-on-methane-leakage-in-the-energy-sector/public-consultation>

BOX 3: FALSE SOLUTIONS, GREENWASHING: HISTORY OF THE FOSSIL FUEL INDUSTRY'S DANGEROUS PATTERN

Beyond the technical discussions about the reform of the TEN-E and the future of our energy infrastructure (and of our planet) there is a pattern that needs to be highlighted.

For decades, oil and gas companies have known³¹ about the negative impact their activities have on the environment. They have since relentlessly tried to deny science, delay, weaken and sabotage climate action, and to protect their profits – despite knowing that their business model is killing our future.

At EU level, this translates into the fossil fuel industry constantly pushing for 'technological' unicorn solutions that are meant to save us all (and their profits). Indeed, whenever people power moves the debate forward, the fossil fuel industry is always ready with false solutions such as CCS³² and BECCS³³. A quick glance at the list of members of the biggest gas and hydrogen lobby reveals that fossil fuel companies are well represented in all those organisations. Oil and gas giants Shell, BP and Equinor for instance, are all members of both IOGP and Hydrogen Europe. IOGP itself is also a member of Hydrogen Europe. All these companies have common interests and are working toward the same goal: to stay relevant and part of the decision making process.

In order to show themselves as part of the solution and deflect blame for the problem, many fossil fuel lobbyists in Brussels are pushing for 'solutions' such as hydrogen. While hydrogen may have a limited role to play in some hard-to-abate sectors like heavy industry or aviation, the fossil fuel industry uses the hope of such 'solutions' to water down and sabotage any significant climate measure. We can see this in the way that the hydrogen hype is being used to pretend that renewable ('green') hydrogen can be used in sector after sector, when the reality is that it will be a scarce resource. Every time one of these 'new solutions' emerge, it takes academics³⁴ and NGOs³⁵ a lot of time and resources to prove the truth and debunk them.³⁶ And we know time and resources are of the essence in the fight for climate justice.

These discussions are a distraction put in place by the fossil fuel industry and EU institutions are falling into their trap. Let's be clear, the fossil fuel industry is spending hundreds of thousands of Euros in lobbying, hiring former EU officials as lobbyists³⁷ with scant regard for ethics and conflict of interest³⁸ rules³⁹, all that to slow down climate action. The fossil fuel industry has always been and will always be part of the problem, not the solution. Their objective is to protect their profits at all costs and that is fundamentally incompatible with significant climate action.

ENTSO-G is the crystallization of the fossil fuel industry becoming an integral part of EU decision making processes. While it tries to present itself as a 'neutral'⁴⁰ body to the European Commission in order to retain its power, our briefing clearly shows that ENTSO-G is a biased body serving its members: the gas infrastructure industry. Their full support for hydrogen also confirms this 'false solution' strategy to stay relevant and part of the decision making process of the EU. When a body created by EU institutions brings millions in public funding to its members and signs open letters as 'the gas industry'⁴¹ we know they are not serving the public interest.

It is time Europe stops listening to the fossil fuel industry and its lobby group. That is why we are calling for fossil free politics.⁴² Excluding the fossil fuel industry and its undue influence from climate and energy decision making is the only way we will reach the level of change we need to save people and the planet.

31 <https://exxonknew.org/>

32 <https://www.foodandwatereurope.org/factsheet/carbon-capture-and-storage-an-expensive-and-unproven-false-solution/>

33 <https://friendsoftheearth.eu/news/burning-trees-will-not-save-us-from-the-climate-crisis/>

34 <https://friendsoftheearth.eu/press-release/new-study-reveals-incompatibility-of-climate-safety-and-gas/>

35 <https://friendsoftheearth.eu/news/why-hydrogen-bubble-burst-europes-face/>

36 <http://priceofoil.org/2020/09/23/big-oil-reality-check/>

37 The latest case is the one of Klaus-Dieter Borchardt, who went straight from being Deputy Director General for Energy at the European Commission to being Senior energy Consultant for law firm Baker McKenzie. More detail here: https://corporateeurope.org/sites/default/files/2020-12/hydrogen-report-web-final_0.pdf

38 <https://euobserver.com/institutional/150202>

39 <http://www.fossilfreepolitics.org/research.pdf>

40 https://www.entsog.eu/sites/default/files/2020-11/SD0021_201110_Note_TEN-E_Position_Final.pdf

41 https://entsog.eu/sites/default/files/2020-10/Gas%20Industry%20Declaration%20on%20EU%20Strategy%20to%20reduce%20Methane%20Emissions_%20Final.pdf

42 <http://fossilfreepolitics.org/>

CONCLUSIONS AND DEMANDS

**CUT FOSSIL FUELS
OUT OF OUR POLITICS!**



Though it was created under EU legislation, ENTSO-G behaves as an institutional lobby group, using its advisory role with the European Commission to defend the gas transport industry's interests.

Tasking those whose business model depends on building gas infrastructure to help us define the energy system we need in the future is an endeavor doomed to fail from the start.

To avert climate breakdown, we know that the vast majority of the fossil fuel's industry's reserves (including gas) need to stay in the ground. Tasking those whose business model depends on building gas infrastructure to help us define the energy system we need in the future is an endeavor doomed to fail from the start.

The fossil fuel industry's business model is killing our present and our future. Its extractive activities cause massive environmental destruction harming health, and destroying livelihoods and habitats.⁴³ It is also heating the planet, causing countless deaths due to extreme weather, heatwaves, storms, and droughts, etc alongside other effects including forced migration.⁴⁴ And this is only getting worse. Fossil fuel lobbyists, including ENTSO-G, are actively working against a truly clean pathway towards 100 percent renewables by coming up with whole lists of false solutions like hydrogen, CCS etc to distract from the only solution against climate change, stop using fossil fuels altogether. Yet in both Brussels and national capitals, their lobbyists are still sitting at the table with decision makers when it comes to climate action. Some, like ENTSO-G, are given tremendous power by the European Union over the future of our energy mix.

We must cut fossil fuel interests out of politics.

⁴³ <https://www.unenvironment.org/explore-topics/disasters-conflicts/where-we-work/nigeria/environmental-assessment-ogoniland-report>

⁴⁴ <https://friendsoftheearth.uk/climate-change/climate-refugees> for a specific example of displacement because of gas extraction: https://www.foei.org/wp-content/uploads/2020/06/Gas-in-Mozambique_Friends-of-the-Earth_Executive-Summary_English.pdf

WE DEMAND:

- 1** A revised fossil-free TEN-E, **removing the current priority seat that ENTSO-G currently enjoys** to define infrastructure needs and assess projects. EU member states and the European Parliament must remove ENTSO-G from the TEN-E and task a transparent, independent body in-house for advising all decision making processes on gas infrastructure capacity and needs.
- 2** **A TEN-E free from false solutions and distractions, like mega infrastructure for hydrogen, CCS and blurred concepts like "smart gas grids"**
- 3** **ENTSO-G be recognised by the European institutions** as a lobbying organisation representing the gas infrastructure industry and certainly not a public interest organisation.
- 4** **To institute a firewall to end fossil fuel industry** access to decision-makers. It is unacceptable to allow representatives of the gas industry such a central say in the future of our energy mix. ENTSO-G should be removed from all EU advisory bodies, expert groups and public research bodies.
- 5** **To limit undue influence on energy and climate legislation,** decision makers should also refrain from meeting with ENTSO-G or its members, as well as with lobby or public affairs companies that represent their interests.

**READ MORE ABOUT THE CAMPAIGN
FOR FOSSIL FREE POLITICS:**

[FOSSILFREEPOLITICS.ORG](https://fossilfreepolitics.org)



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