

Dear Members of the European Parliament,

In November 2023, the EU Commission adopted Projects of Common and Mutual Interest<sup>1</sup>(PCI list) under the revised Trans-European Networks for Energy Regulation (TEN-E) Regulation<sup>2</sup>.

While gas infrastructure is no longer an eligible category under the revised TEN-E Regulation, the current **6th PCI list still includes a high number of problematic projects**. These involve for example two mega fossil gas pipelines and large, costly hydrogen and carbon capture and storage (CCS) infrastructure projects which are promoted by and benefit the fossil fuel industry.

**These projects risk actively undermining the urgently needed just transition and equally undermining real ambitious emission reduction efforts. We thus urge you to reject the PCI list in its current state by supporting the PCI list objection.** The PCI list must only promote projects that are in line with climate targets, such as a call for climate neutrality by 2040, and urgently needed climate action, and not those which ultimately benefit polluters.

Costly energy megaprojects, almost entirely put forward by the fossil fuel industry which lack proof for actual life-cycle energy emissions reduction, should not get priority status and procedural and financial support by the EU. **These projects risk becoming stranded assets while helping the fossil fuel industry to stay rich by selling false solutions.** Amidst an ongoing cost of living crisis and a growing threat of climate collapse, it is an **alarming signal to greenlight problematic energy projects on the PCI list. We urge you to act in the common interest of Europeans, and not in the vested interest of polluters.** Please reject the 6th list in its current form!

Our specific concerns include:

- **Fossil gas:** The draft list contains **two highly contested mega fossil gas projects**. The EastMed pipeline which aims to transport fossil gas to Europe from gas fields in disputed waters and a region ridden with geopolitical tensions including the impacts of the war in the Middle East. This expensive pipe, planned to be one of the the deepest underwater pipelines ever laid<sup>3</sup>, will mean **more new gas extraction, an activity**

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<sup>1</sup> PCIs and PMIs are large energy projects awarded with top EU priority status. They are projects deemed in highest EU priority and they can benefit from accelerated permitting procedures as well as from subsidies. [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_23\\_6048](https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_6048)

<sup>2</sup> Trans-European Networks for Energy Regulation (TEN-E) [https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/selection-process\\_en](https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/selection-process_en)

<sup>3</sup> <https://www.politico.eu/article/eastmed-a-pipeline-project-that-ran-afoul-of-geopolitics-and-green-policies/>

clearly advised against by the IEA<sup>4</sup>, and risks fuelling confrontations even further. The oversized MelitaTransGas pipeline, planned to connect Malta with Sicily, raises serious concerns linked to climate impacts and due to its **links to the person standing accused of murdering journalist and anti-corruption activist Daphne Galizia Caruana**.<sup>5</sup>

- **Hydrogen:** There are 68 large-scale, cross border **hydrogen projects on the PCI list, entirely submitted by fossil fuel majors like RWE, Shell and BP and the fossil gas transport industry**, the European Network of Gas Transmission System Operators' (ENTSO-G). While two-thirds of these projects have construction costs exceeding €50 billion<sup>6</sup>, the costs of the remaining third have not been disclosed. Thus, all 68 hydrogen projects' construction and operation costs (over 20 years) could exceed a total of €100 billion or more.<sup>7</sup> While many of these projects claim to transport fossil based hydrogen<sup>8</sup>, **no holistic climate impact assessment** has been carried out. Also, **no profound assessments on the availability of hydrogen and infrastructure implications for priority use for hydrogen have been carried out**, raising doubts about the need for these costly projects. An undifferentiated approach to building a large hydrogen network risks making **consumers pay for an unneeded, oversized grid at times when many Europeans already struggle with their energy bills**. This could also be the case with the **H2Med hydrogen pipeline cluster**. With estimated costs of €2.5 billion euros, it envisages the transport of hydrogen from the Iberian Peninsula to the center of Europe. It was proposed without a prior study on the prospects for future production and demand of green hydrogen. The project cluster would involve the building of new pipelines and the repurposing of fossil gas infrastructure with environmental and territorial impacts, raising concerns about economic and technical feasibility.
- **Conflict of interest:** Approximately 75% of hydrogen projects submitted for PCI status are promoted by ENTSO-G members, who are part of the fossil gas transport industry. This body has a crucial role in the process of selecting PCIs, creating a worrying conflict of interest.

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<sup>4</sup> <https://www.iea.org/reports/net-zero-by-2050>

<sup>5</sup> <https://timesofmalta.com/articles/view/yorgen-fenech-compilation-evidence-reopens-daphne-murder-case.1068621> and <https://www.theguardian.com/world/2021/nov/21/eu-could-fund-gas-project-linked-to-man-charged-in-maltese-journalist-murder-daphne-caruana-galizia>

<sup>6</sup> Cost data from ENTSO-G' Ten Year Network Development Plan (TYNDP). See 'TYNDP 2022 List of Projects' here: <https://www.entsog.eu/tyndp#entsog-ten-year-network-development-plan-2022><https://www.entsog.eu/tyndp#entsog-ten-year-network-development-plan-2022>

<sup>7</sup> <https://www.foodandwatereurope.org/blogs/list-of-top-priority-hydrogen-infrastructure-considered-in-europes-common-interest-includes-projects-worth-at-least-e50bn/>

<sup>8</sup> This information was submitted by project promoters to the EU commission and published during the public consultation period. The excel file containing this information has been unpublished by the EU Commission [status: 1 February 2024]

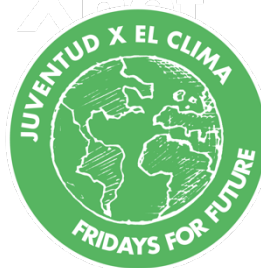
- **CO2 transport:** The 6th PCI list contains 14 CO2 network projects to support Carbon Capture and Storage (CCS), a technology plagued by high costs, technological uncertainties and a long history of failed projects<sup>9</sup>. The reliance on techno fixes like CCS has been, and continues to be successfully **used by the fossil fuel industry to protect their dirty business model** while jeopardizing genuine emissions reduction efforts.

**Providing accelerated permitting processes and a faster environmental impact assessment and eventually EU tax money to such projects goes against the interest of people and the planet.** For all these reasons, we urge you to act to protect our real joint common interest. **Please reject the list by voting for the objection tabled against it on 22 February.**

Kind regards, Frida Kieninger (Food & Water Action Europe) on behalf of:



<sup>9</sup> [https://www.foodandwaterwatch.org/wp-content/uploads/2023/05/ib\\_2003\\_carboncapture-web.pdf](https://www.foodandwaterwatch.org/wp-content/uploads/2023/05/ib_2003_carboncapture-web.pdf)





### Full list of signatories, by organization and country

|  |                 |
|--|-----------------|
| Food & Water Action Europe   | EU              |
| WeSmellGas   | Belgium         |
| Environmental Association "Za Zemiata" (Friends of the Earth Bulgaria) | Bulgaria        |
| Ecologistas en Acción  | Spain           |
| Gas No Es Solución   | Spain           |
| Corporate Europe Observatory   | EU              |
| Center for International Environmental Law                             | Geneva          |
| Comité Ciudadán Emerxencia Ría de Ferrol                               | Spain           |
| NOAH - Friends of the Earth Denmark                                    | Denmark         |
| Deutsche Umwelthilfe   | Germany         |
| Friends of the Earth Malta   | Malta           |
| Friends of the Earth Europe  | EU              |
| Debt Observatory in Globalisation (ODG)                                | Catalonia/Spain |
| Instituto Internacional de Derecho y Medio Ambiente (IIDMA)            | Spain           |
| Galiza sen gas   | Galicia/Spain   |

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|---|-----------------|
| Love Leitrim                                      | Ireland         |
| Natasa Ioannou                                    | Cyprus          |
| Amigos de la Tierra España                        | Spain           |
| Campagna Nazionale Per il Clima Fuori dal Fossile | Italy           |
| Movimento No TAP/SNAM Brindisi                    | Italy           |
| Emergenzaclimatica.it                             | Italy           |
| Coordinamento Ravennate Fuori dal Fossile         | Italy           |
| Green Liberty                                     | Latvia          |
| Intersindical Valenciana                          | València, Spain |
| Fundación Renovables                              | Madrid, Spain   |
| Rete Legalità per il clima                        | Italia          |
| The Daphne Caruana Galizia Foundation             | Malta           |
| Gastivists collective                             | International   |
| Zelena akcija/FoE Croatia                         | Croatia         |
| CEE Bankwatch Network                             | CEE             |
| Global Witness                                    | UK/Belgium      |
| TerraBlu  | Italy           |
| Greenpeace EU                                     | EU              |
| CAN Europe  |                 |
| Rete NoRigass NoGNL                               | Italy           |
| Forum Ambientalista                               | Italy           |
| Comitato Cittadini per l'Ambiente Sulmona         | Italy           |
| Coordinamento No SNAM                             | Italy           |
| Confederazione Cobas Nazionale                    | Italy           |
| Bond Beter Leefmilieu                             | Belgium         |
| Xnet  | Spain           |
| Not Here Not Anywhere                             | Ireland         |

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|---|-----------------------|
| Fridays for Future Spain  | Spain                 |
| ReCommon  | Italy                 |
| Coordinamento Nazionale NoTriv  | Italy                 |
| European Environmental Bureau   | Belgium               |
| urgewald  | Germany               |
| Andy Gheorghiu Consulting   | Germany/International |
| PowerShift  | Germany               |
| Centre for Transport and Energy   | Czech Republic        |
| Earth Systems Association   | Malta                 |
| Estonian Green Movement   | Estonia               |
| ClientEarth   | EU                    |
| Workshop for All Beings   | Poland                |
| Polish Green Network  | Poland                |
| Fundacja Instytut na rzecz Ekorozwoju   | Poland                |
| ADEPRU Asociación para la defensa paisaje protegido Valle del Río Ungría              | Spain                 |
| Polski Klub Ekologiczny Okręg Mazowiecki (EN: Polish Ecological Club Mazovian Branch) | Poland                |
| Moviment Graffiti   | Malta                 |