

## **Bellona Europa Response TEN-E Public Consultation**

Bellona Europa strongly supports the EU's commitment to climate neutrality by 2050, and the need to revise regulation (EU) No 347/2013 "Guidelines for Trans-European Energy Infrastructure" (TEN-E). The revised TEN-E Regulation must reflect the urgent need for climate action, and be in line with pathways to reach the target of carbon neutrality by 2050. It must encourage and facilitate the development of energy carriers consistent with the transition to a low-carbon world. Particularly, the revised TEN-E regulation must reflect the urgency of facilitating the deployment of crucial Carbon Capture and Storage (CCS) technologies, as well as excluding unabated fossil fuel infrastructure projects which are massive risk bearers for emissions lock-in.

Priority must be given to electricity grid expansion, hydrogen dedicated infrastructure and CO<sub>2</sub> infrastructure. This will connect Europe's different renewables, facilitating their direct and effective use as well as ensuring security of supply and availability. In situations where gaseous fuels may be used, or where electricity is not used directly, only dedicated hydrogen infrastructure should be developed, and industrial clusters should be prioritised in this regard.

### **Bellona Europa therefore urges the European Commission to ensure that the revised TEN-E:**

- 1. Keeps Carbon Dioxide Transport as one of the 12 strategic trans-European energy infrastructure priorities, and includes Carbon Dioxide Storage as eligible for EU funding***
- 2. Excludes unabated fossil fuel infrastructure as eligible for EU funding under the regulation***

Bellona Europa support and appreciate the European Commission's recognition of the need for a revision as outlined in the European Green Deal and in the published [Combined Evaluation Roadmap/ Inception Impact Assessment](#). The stated aim of the TEN-E Regulation, improving the interconnectedness of energy across Europe and in particular connecting European renewable energy usage, is more important than ever. On the pathway to a low-carbon world, European countries will have to work together to share renewable and low-carbon resources.

The TEN-E regulation has already improved both the planning and the selection processes of investment projects eligible for Connecting Europe Facility (CEF) funding – offering up useful guidance, a common legal basis and instruments for identifying priority needs for trans-European infrastructure. But in its current state, the TEN-E fails to serve as a guarantee of reaching the set targets of climate neutrality by 2050. The ongoing revision is an opportunity to make sure that the TEN-E enables the low-carbon transition and the infrastructure to aid deep decarbonisation of industry – boosting European competitiveness and jobs in a low-carbon world.

Infrastructure is the lynchpin of economic development, and without low-carbon infrastructure the transition to a low-carbon world will significantly drag behind, if feasible at all. The development of low-carbon infrastructure to decarbonise industry is a pre-requisite of the "just transition for all", by enabling job retention as well as job creation. By facilitating investments to and modernise low-carbon industry, through expansion of electricity grids, dedicated hydrogen networks and CO<sub>2</sub> networks, we ensure the creation of jobs in European competitive industries fit for a low-carbon world. The European Union has a natural role to coordinate low-carbon infrastructure development in a cost effective way, more efficient than independent Member State action.

## ***Bellona Europa Recommendations for TEN-E Regulation Revision***

Bellona Europa highlights, in particular, the need for CO<sub>2</sub> transport *and storage* infrastructure for industrial decarbonisation in its below recommendations, as well as the need to exclude unabated fossil fuels currently included in the TEN-E. We therefore urge that the European Commission:

### **1. Keep Carbon Dioxide Transport as one of the 12 strategic trans-European energy infrastructure priorities**

As outlined by the European Commission's European Green Deal (EGD), the TEN-E regulation will be reviewed to "ensure consistency with the climate neutrality objective". Given the important role required to be played by Carbon Capture and Storage (CCS) technology in a majority of the net-zero by 2050 scenarios, as outlined in the Commission's "A clean planet for all" (2018), the TEN-E's inclusion of cross-border carbon dioxide networks as a priority thematic area is of vital importance.

CO<sub>2</sub> transport and storage that serves key European industrial clusters are essential components of any plan to achieve net zero emissions by 2050, and as outlined by Bellona Europa in [our industry decarbonisation guide](#) it complements limitations of feasibility, scale, costs and time associated with other climate action tools.

Geological storage sites are not evenly distributed amongst member states, and the development and large-scale deployment of cross-border European CO<sub>2</sub> transport and storage infrastructure is crucial to reach the set target of climate neutrality by 2050. The infrastructure will enable clean, competitive energy and industrial sectors as well as early large-scale clean hydrogen and the delivery of significant volumes of carbon emission reductions and removals.

**The European Union has a key role to play in ensuring a level playing field for industry within its Single Market in a carbon constrained world, by ensuring fair access to CO<sub>2</sub> storage.**

CO<sub>2</sub> transport infrastructure has direct benefits for job retention and growth across sectors, and it can enable carbon dioxide removal. It is therefore vital that the TEN-E ensure and enable the development of CO<sub>2</sub> transport and storage infrastructure that can serve many different industries, offering optionality of decarbonisation across sectors, and preserve existing industrial clusters.

**It is our strong recommendation that the TEN-E continues to include "cross-border carbon dioxide networks" as a priority thematic area**, as outlined in Annex I "Energy infrastructure priority corridors and areas" (12), which states that the regulation applies to the "development of carbon dioxide transport infrastructure between Member States and with neighbouring third countries in view of the deployment of carbon dioxide capture and storage".

The current TEN-E has already aided the advancement of industrial decarbonisation, notably projects taking place in Rotterdam and Ireland, as well as the Northern Lights project. The Port of Rotterdam project is the most advanced EU project for widespread industrial decarbonisation, with CO<sub>2</sub> transport and storage playing a key part. With some of the strictest emission reduction targets for industry, the Netherlands have benefited from European aid and support in the development of CO<sub>2</sub> transport and storage networks, facilitating a continuation of high ambition levels. The PCIs which include CO<sub>2</sub> transport and storage has helped support the "business case" for low-carbon industry, and made it clear that decarbonisation can and should happen now.

***Ways in which the TEN-E could be improved to support industrial decarbonisation through Carbon Dioxide Transport and Storage:***

- In Annex II (4) “concerning carbon dioxide”, we recommend that the revised TEN-E:
  - A) ensure that point a) is revised to include repurposing and retrofitting of natural gas pipelines networks. Revision of this point would need to be in line with the Sustainable Finance Taxonomy, including the retrofit of gas pipelines for low-carbon gas transportation as a sustainable investment towards a net-zero economy. In the point’s current formulation, there is a risk that only new, dedicated pipelines would be seen as energy infrastructure to be developed.
  - B) removes the exclusion included in point (b), where it is stated that it does not include “infrastructure within a geological formation used for the permanent geological storage of carbon dioxide...and associated surface and injection facilities”. With secure access to sites of storage, we can expect additional large-scale investments in capture projects, which would in turn bring down costs and support the business case for CCS. CO<sub>2</sub> storage should therefore be included as an essential part of the CO<sub>2</sub> infrastructure and component of a CCS project. As a key element to deliver real climate change mitigation, CCS should receive funding as a vital part of CO<sub>2</sub> infrastructure.
- Ensure the inclusion of all CO<sub>2</sub> transport modalities – pipeline, ship, barge, train, truck and related docking facilities – in the revised TEN-E. This will allow all European regions and industries to connect to the European infrastructure and thus becoming eligible for funding under CEF. Upcoming CCS projects, included in the 4<sup>th</sup> PCI list, rely on CO<sub>2</sub> shipping to connect capture and storage sites, a flexible transport mode that allows a combination of larger and smaller emitters to share a storage site. In not allowing multimodalities of CO<sub>2</sub> transport as outlined above, we could prolong their timely implementation and at worst risk them not becoming operational.

**2. Exclude unabated fossil fuel infrastructure as eligible for EU funding under the regulation**

The EU should not be funding projects increasing levels of carbon dioxide in the atmosphere. This can be guaranteed through a smart and safe design of the TEN-E Regulation consistent with the climate neutrality objective of the EU, which therefore disallows funding to go to projects incompatible with the net-zero world, such as unabated fossil fuels based projects.

**In order to align TEN-E with the EU Green Deal, we therefore ask the European Commission only to consider funding for projects which meet the criteria outlined in the Sustainable Finance Taxonomy, as outlined by its Technical Expert Group.** We cannot continue to term projects locking in the use of fossil gas for decades as “Projects of Common Interest” when they are in direct contrast, and harmful, to emission reduction plans to reach climate neutrality by 2050.

This is in line with the 2018 evaluation of the TEN-E Regulation published by Trinomics<sup>1</sup>. The report acknowledges that the TEN-E’s actual contribution to reach the set climate and energy targets for

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<sup>1</sup> <http://trinomics.eu/project/ten-e-evaluation/>

2020 is difficult to assess due to the continued inclusion of unabated fossil fuel infrastructure projects. We must ensure that the TEN-E Regulation has net-positive contribution to reaching the set emission reduction targets with the aim of reaching climate neutrality by 2050; for this to be the case unabated fossil fuel infrastructure projects must be excluded. ***Ways in which the TEN-E could be improved to exclude funding of unabated fossil fuel infrastructure:***

- **Amend Annex I (2) and (3) as well as Annex II (2) and (3). A revised TEN-E should clearly set out that gas and oil are no longer priority corridors, and can in turn not benefit from CEF funding – in line with the proposed EU Sustainable Finance Taxonomy**

*Annex I: General Public Consultation Reply*

**Find below Bellona Europa’s submission of the General Public Consultation on the TEN-E Regulation.**

**(i) RELEVANCE AND EU ADDED VALUE**

*How would you rate the importance of the following objectives for trans-European energy infrastructure networks:*

	<i>Important</i>	<i>Important to a large extent</i>	<i>Important to a small extent</i>	<i>Not important</i>	<i>I do not know</i>
<b>Increased resilience of energy infrastructure against technical failures, natural or man-made disasters, and the adverse effects of climate change and threats to its security</b>	X				
<b>Consumer empowerment – making sure consumers’ interests are considered in decisions related to energy infrastructure</b>		X			
<b>Secure and diversified EU energy supplies, sources and routes</b>	X				
<b>Integration of renewable energy sources into the grid</b>	X				
<b>Increase cross-border interconnections and deepen regional cooperation to transport energy from renewable sources where it is most needed</b>	X				
<b>Giving priority to energy efficiency (outing the Energy efficiency first principle in practise)</b>			X		
<b>Achieving the EU’s decarbonisation objectives for 2030 and 2050, including climate neutrality under the European Green Deal</b>	X				
<b>Increased digitalisation of the energy infrastructure (e.g. smart grids)</b>		X			
<b>Energy system integration and sector coupling (integration of the different energy sectors and beyond)</b>		X			

**Bellona Europa Explanation:** It is important to acknowledge that each of the aforementioned objectives have an important role to play to collectively reach the objectives set out by the TEN-E Regulation: “the timely development and interoperability of cross-border energy infrastructure networks in order to achieve the EU’s energy policy objectives”. Notably, the ongoing revision of the TEN-E regulation, in light of the European Commission’s impressive new Economic Growth Strategy the European Green Deal (EGD) will to a great extent focus on ensuring that the TEN-E Regulation is in line with the goals set out both in the EGD and the Paris Agreement. In this context, Bellona Europa believes the objectives to focus on in particular not included in the table above, should be further developments of CO2 transport and storage facilities infrastructure, as well as the exclusion of fossil fuels infrastructure.

Which of the following infrastructure categories do you consider relevant for the regulatory framework on trans-European energy networks:

	Relevant	Relevant to a large extent	Relevant to a small extent	Not relevant	I do not know
Electricity infrastructure (transmission lines and storage)	X				
Grids for offshore renewable energy	X				
Smart electricity grids	X				
Smart gas grids				X	
Natural gas infrastructure (pipelines and storage)				X	
Liquefied Natural Gas (LNG) terminals				X	
Dedicated hydrogen (H2) networks	X				
Infrastructure for the integration of renewable and carbon neutral gases			X		
Power to gas installations			X		
CO2 networks (for transporting CO2)	X				
Geological storage of CO2	X				

**Bellona Europa Explanation:** Bellona Europa highlight the importance of the two last objectives in the table: “CO2 networks for transporting CO2” and “Geological Storage of CO2”. The two objectives have great potential to facilitate job retention and growth across sectors, as well as aiding carbon dioxide removal. It is therefore vital that the revised TEN-E Regulation ensures and enable the development of CO2 transport infrastructure that can serve many

*different industries, offering optionality of decarbonisation across sectors, and preserve existing industrial clusters. This point has been further elaborated on in the Bellona Europa TEN-E Position Paper.*

*It is, as outlined in the referenced Bellona Europa position paper, our strong recommendation that a revised TEN-E Regulation exclude all unabated fossil fuel infrastructure projects. This is vital in the context of aligning the TEN-E Regulation with the European Union's new Climate ambition, the Paris Agreement and the EGD. As outlined also in the Trinomics Evaluation Study from 2018: "The priority corridors and areas as well as the eligibility criteria seem no longer (to) follow the evolution of the energy system and the "new" policy priorities. In particular the need for supporting oil and gas transmission projects may merit a revision in the context of the long-term decarbonisation pathway". This is why Bellona has ranked several of the infrastructure categories above as not relevant.*

*The revised TEN-E Regulation must facilitate and ensure further expansion of electricity transmission grids. This is why Bellona Europa has ranked the two categories of "infrastructure for the integration of renewable and carbon neutral gases" and "power to gas installations" as relevant to a smaller extent. Terminology is key, as illustrated by recent gas industry efforts to throw "renewable" and "decarbonised" gas into a confusing mix. Different types of gas requires much different types of infrastructure, something not reflected in the current conversation. We cannot allow the monumental challenge of deploying enough renewable energy to be compromised by false solution promoted by and for the sole benefit of the gas industry. We therefore request further clarity and detail as to what is included when speaking of "renewable and carbon neutral gases" – as it has great consequences for the actual, if any, decarbonisation effects of investment into the two aforementioned infrastructure categories.*

*It is important to clarify and establish that the two aforementioned infrastructure categories are far more expensive and inefficient pathways and will be limited to sectors of the economy that have no other scalable and viable solutions. Bellona has already outlined its recommendation in its February 2020 article: ["How the gas lobby is making electricity grids irrelevant"](#). There is a greater need for wide-scale expansion of electricity transmission grids rather than encouraging a redirection of investments into the two aforementioned categories. Such redirection of investments risk prolonging the use of natural gas through stranded assets, resulting in emissions lock-in. Investments in the other presented infrastructure categories listed as relevant by Bellona Europa, are better options aligning the revised TEN-E Regulation with the target of climate neutrality by 2050.*

*For more on Bellona's work on the decarbonisation of Industry see our 2018 [An Industry's Guide to Climate Action](#)  
For more on Bellona's work and reports on Carbon Dioxide Removal see our website on the Negative Emissions Projects ([NEGEM](#))*

Which features do you consider the most important for a PCI as part of trans-European energy network?

	Important	Important to a large extent	Important to a small extent	Not important	I do not know
Integration of renewable energy sources into the grid	X				
Contribution to greenhouse gas emission reduction	X				
Security of supply	X				
Market integration (e.g. to improve infrastructure and increase system flexibility)	X				
Increase competition in the market		X			
Innovation	X				
Contribution to increase the energy efficiency of the energy system		X			
Environmentally sound implementation, i.e. compliance with the relevant regulations especially in the arena of environmental impact assessment, water protection, nature conservation and air quality	X				
Generation of direct benefits to the local communities	X				

**Bellona Europa Explanation:** It is the collective and parallel efforts to reach all objectives above which will ensure the successful development of the Trans-European Energy Network. The TEN-E Regulation must, however, be updated to ensure that all PCIs are in line with the climate neutrality target by 2050. To this end, the Sustainable Finance Taxonomy needs to form the basis of the criteria of what constitutes a PCI. Not least, the Do No Significant Harm (DNSH) principle should be incorporated to ensure a holistic approach that ensures real climate mitigation efforts and decarbonisation across all PCIs. This is also the reason why Bellona Europa strongly recommend the exclusion of unabated fossil fuel infrastructure from the TEN-E Regulation and PCI selection criteria.

To what extent do you agree with the following statement: “The development of trans-European energy networks cannot be sufficiently achieved by the Member States alone and can therefore be better achieved through coordination at EU level?”

→ **Fully agree**

Do you agree that the revised TEN-E regulation can make an important contribution to the economic recovery in Europe through a green transition in response to the COVID-19 response?

→ **Yes**

**Bellona Europa Explanation:** The contribution of the TEN-E Regulation towards a green economy recovery in the wake of COVID-19 depend on a successful revision, the form of which has been outlined in our position paper above. To summarise our main points, the revision must facilitate:

i) investments into CO2 transport and storage infrastructure for the purpose of CCS, including retrofitting of existing infrastructure

ii) facilitate development and investment in dedicated clean hydrogen networks

iii) ensure alignment of TEN-E with the Paris Agreement, Sustainable Finance Taxonomy and the climate neutrality target by 2050. For this to become a reality, unabated fossil fuel infrastructure must be excluded from the TEN-E Regulation and the criteria for a PCI.

**(ii) PUBLIC PARTICIPATION AND TRANSPARENCY**

Despite the existence of established standards and procedures for the participation of the public in the environmental decision-making process, the TEN-E Regulation states that additional measures are needed to ensure the highest possible standards of transparency and public participation for all relevant issues in the permit granting process for projects of common interest. Enhancing public participation is among the key objectives of the Regulation. Under the current rules, the public consultation aims to inform relevant stakeholders (the appropriate national, regional and local authorities, landowners and citizens living in the vicinity of the project, the general public and their associations, organisations or groups) about the project at an early stage in order to help identify the most suitable location or trajectory and address all the relevant issues in the project application.

Are you aware of any PCIs in Europe?

→ **Yes, I am aware of several PCIs**

Are you aware that there is a public participation process with regards to PCIs?

→ **Yes I am aware of the procedure and its benefits**

Have you been involved in a public participation process with regards to any PCIs?

	Yes, once	Yes, several times	No, never	I don't know
Have you visited the website of a PCI?		X		
Have you seen the information leaflet of a PCI?		X		
Have you participated in meetings dedicated to a PCI?		X		
Have you provided feedback on PCI during any consultation phase?		X		

Do you consider the public participation process useful?

→ **To a large extent**

If you have never participated indicate why (not relevant?)

*Although Bellona Europa has supported several PCIs through letters of support, and find the public participation process useful in principle, we find it useful to add that there is room for improvement. While article 9 of the TEN-E Regulation sets out requirements on transparency and public participation to reduce public opposition to such projects, these requirements had not been sufficiently implemented into national law in all Member States in 2018. There is a need to further engage the public in infrastructure planning and development.*

How would you assess the usefulness of the following communication channels for providing and exchanging information on PCIs:

	<i>Very useful</i>	<i>Useful to a large extent</i>	<i>Useful to a small extent</i>	<i>Not useful</i>	<i>I don't know</i>
<b>Project website</b>	X				
<b>Information leaflet</b>		X			
<b>Meetings</b>	X				
<b>Providing information in writing</b>		X			

***In line with the requirements of the TEN-E Regulation, the Commission established an infrastructure transparency platform easily accessible to the general public, including via the internet, with the purpose of providing information on current PCIs in an open, transparent and interactive way.***

Are you familiar with the PCI interactive map on the transparency platform?

→ **Yes**

How would you assess the PCI interactive map on the Transparency Platform, which includes the geographic information, implementation plan, amount of EU financial support and the benefits that each project brings at national and local level?

	<i>Fully</i>	<i>To a large extent</i>	<i>To a small extent</i>	<i>Not at all</i>	<i>I don't know</i>
<b>Comprehensive</b>		X			
<b>Up-to-date</b>		X			
<b>Provided in simple language</b>		X			
<b>Easy to navigate</b>		X			

Have you observed any improvement in the transparency of the planning and building process of any PCIs in comparison to other energy infrastructure projects?

→ *To a small extent*

Please share any other recommendations that would contribute to an enhanced/strengthened participation of the public in TEN-E energy infrastructure planning and building:

There is an urgent need to increase transparency, in particular on the topics of environmental risks and costs, as part of the selection process and public participation.

**(iii) DOCUMENTS UPLOAD AND FINAL COMMENTS**

Possibility to add additional information:

- [Bellona Europa submitted Roadmap on TEN-E](#)
- [Bellona Europa Response Hydrogen Strategy](#)
- [Bellona Europa response to the Roadmap for an EU Smart Sector Integration Strategy](#)

## Annex II: Targeted Consultation

### (i) EFFECTIVENESS

*As the Regulation was designed to help overcome some of the key barriers to the development of European wide energy infrastructure, the survey aims to assess the effectiveness of the Regulation, concerning the extent to which it has achieved the set objectives, and the different factors that has influenced this.*

#### **To what extent do you agree with the following statements regarding the TEN-E Regulation's overall impact?**

	Completely Agree	Agree	Neither Agree or disagree	Disagree	Completely disagree	Do not know
Contributing to energy market integration throughout Europe		X				
Achieving an adequate security of supply level				X		
Contributing to competitiveness in the EU energy market		X				
Achieving the 2020 climate and energy targets				X		

**Bellona Europa Explanation:** There is little doubt that the TEN-E Regulation has overall contributed positively to the facilitation of investments to energy infrastructure projects. The actual contribution varies, however, across the listed statements. Findings presented in the 2018 Trinomics Evaluation of the TEN-E Regulation<sup>2</sup> outlines the difficulty of assessing the full contribution of the TEN-E to the listed statements. This is in particular due to the TEN-E Regulation's continued inclusion of fossil fuel PCIs. We recommend that in the ongoing revision of the TEN-E, fossil fuel projects are completely excluded. To contribute to further energy market integration throughout Europe, flexibility and competitiveness, it is vital that the revised TEN-E continues to facilitate investments to cross-border carbon dioxide networks.

**1. Contribution to energy market integration throughout Europe:** While the TEN-E Regulation has contributed to a positive investment environment for PCIs in line with set objectives for an integrated European energy market, there is still room for improvement – relying to a great extent on the ongoing

<sup>2</sup> <http://trinomics.eu/project/ten-e-evaluation/>

revision. As addressed under point 4, it is of vital importance that the ongoing revision takes the necessary steps to ensure that the all eligible PCIs are fully in line with the Paris Agreement and the path towards climate neutrality by 2050. Strengthened efforts to unlock the development of missing infrastructure and facilitate an integrated European energy market is still needed. Bellona Europa therefore highlight that the TEN-E Regulation and accompanying PCIs alone cannot sufficiently achieve an integrated European energy market, and additional steps and efforts to streamline relevant policies and regulatory frameworks across the board is needed in parallel to the revision of the TEN-E Regulation. Notably, we recommend that the current revision of the TEN-E regulation include actions to harmonise national legal and regulatory frameworks to facilitate energy infrastructure investments in line with the aim of increased European energy market integration.

**2. Achieving an adequate security of supply level:** Current reliance on fossil fuels is neither in line with the set target of climate neutrality by 2050, nor the reduction of energy dependency that would be necessary to term today's security of supply level as "adequate". On the pathway to an adequate security of supply level fit for the future, we need to diversify Europe's energy mix away from fossil fuels and towards RES. The inclusion of fossil fuel PCIs and the exclusion of CO2 storage infrastructure is not in line with strengthening Europe's security of supply level or risk preparedness. The net-overall impact of the TEN-E Regulation on "achieving an adequate security of supply level" is thus reduced by these two points. As opposed to facilitate investments into fossil fuel infrastructure, the TEN-E Regulation should ensure further expansion of electricity transmission grids and RES integration, as well as CO2 transport *and storage*.

**3. Contributing to competitiveness in the EU market:** It is necessary to improve current insufficient cooperation between national governments, grid operators and regulators. The current lack of cooperation results in barriers to an integrated market with real negative impacts on competition and social welfare. There is here an opportunity cost in ensuring optimal welfare for consumers. Consumer welfare could also be significantly improved by addressing persistent market failures – currently preventing lower wholesale and retail prices. Please see Bellona Europa's full recommendations under point 4, in particular the importance of including CO2 transport *and storage* as eligible for funding under the TEN-E Regulation.

**4. Achieving the 2020 climate and energy targets:** While the TEN-E Regulation has contributed to facilitate investments for several PCIs vital to reach the set climate and energy targets for 2020, the continued inclusion of fossil fuel PCIs make the net-contribution of the TEN-E on climate and energy targets difficult to assess. The current TEN-E Regulation focus to a disproportionately extent on market and supply impact, as opposed to the target of climate neutrality by 2050. Bellona Europa therefore strongly support the ongoing revision of the TEN-E Regulation set to address this.

*Bellona Europa therefore recommends that the European Commission ensures the revised TEN-E:*

**1. Keep Carbon Dioxide Transport as one of the 12 strategic trans-European energy infrastructure priorities**

**It is our strong recommendation that the TEN-E continues to include “cross-border carbon dioxide networks” as a priority thematic area**, as outlined in Annex I “Energy infrastructure priority corridors and areas” (12), which states that the regulation applies to the “development of carbon dioxide transport infrastructure between Member States and with neighbouring third countries in view of the deployment of carbon dioxide capture and storage.

Given the important role required to be played by Carbon Capture and Storage (CCS) technology, as outlined in the Commission’s “A clean planet for all” (2018), the TEN-E’s inclusion of cross-border carbon dioxide networks as a priority thematic area is of vital importance. We strongly appreciate the Commission’s efforts to date in working with Member States to initiate and facilitate CO2 transport PCIs under the CEF. CO2 transport and storage that serves key European industrial clusters are essential components of any plan to reduce emissions, and as outlined by Bellona Europa in [our industry decarbonisation guide](#) it complements limitations of feasibility, scale, costs and time associated with other climate action tools. This message was also strongly echoed by the European Trade Union Council (ETUC) in its [report on a Just Transition for industrial clusters](#).

Geological storage sites are not evenly distributed amongst member states, and the development and large-scale deployment of cross-border European CO2 transport and storage infrastructure is crucial to reach the set target of climate neutrality by 2050. The infrastructure will enable clean, competitive energy and industrial sectors as well as early large-scale clean hydrogen and the delivery of significant volumes of carbon emission reductions and removals. CO2 transport and storage infrastructure also has great potential to facilitate job retention and growth across sectors, and aid carbon dioxide removal. It is therefore vital that the TEN-E ensure and enable the development of CO2 transport and storage infrastructure that can serve many different industries, offering optionality of decarbonisation across sectors, and preserve existing industrial clusters.

The current TEN-E has already aided the advancement of industrial decarbonisation, notably projects taking place in Rotterdam and Ireland, as well as the Northern Lights project. The Port of Rotterdam project is the most advanced EU project for widespread industrial decarbonisation, with CO2 transport and storage playing a key part. With some of the strictest emission reduction targets for industry, the Netherlands have benefited from European aid and support in the development of CO2 transport and storage networks, facilitating a continuation of high ambition levels. The PCIs which include CO2 transport has enabled the clear “business case” of low-carbon industry, and made it clear that decarbonisation can and should happen now. Postponement of action is not an option, and we need to invest today to ensure the solutions of tomorrow.

***Ways in which the TEN-E could be improved to support industrial decarbonisation through CO2 transport and storage:***

- **In Annex II (4) “concerning carbon dioxide”, we recommend that the European Commission**
  - **ensure that point a) is revised to include repurposing and retrofitting of natural gas pipelines networks for the transport of CO2 and low-carbon gases, such as clean hydrogen.** The revision of this point should be in line with the Sustainable Finance Taxonomy, including the

retrofit of gas pipelines for low-carbon gas transportation as a sustainable investment in a net-zero economy. In the point's current formulation, we worry that only new, dedicated pipelines would be seen as energy infrastructure to be developed.

- **removes the exclusion included in point (b), where it is stated that it does not include “infrastructure within a geological formation used for the permanent geological storage of carbon dioxide...and associated surface and injection facilities”.** With secure access to sites of storage, we expect additional investments in capture projects, which would in turn bring down costs and support the business case for CCS. CO2 storage should therefore be included as an essential part of the CO2 infrastructure and component of a CCS project. As a key element to deliver real climate change mitigation, CCS should receive funding as a vital part of CO2 infrastructure.
- **Ensure the inclusion of all CO2 transport modalities – pipeline, ship, barge, train, truck and related docking facilities – in the revised TEN-E.** This will allow all European regions and industries to connect to the European infrastructure and thus becoming eligible for funding under CEF. Upcoming CCS projects, included in the 4<sup>th</sup> PCI list, rely on CO2 shipping to connect capture and storage sites. In not allowing multimodalities of CO2 transport as outlined above, we could prolong their timely implementation and at worst risk them not becoming operational. There should also be an accompanying effort to harmonise relevant legislative frameworks, such as the EU ETS and other funding programmes.

## ***2. Exclude unabated fossil fuel infrastructure as eligible for EU funding under the regulation***

The EU should not be funding projects contributing to increased levels of carbon dioxide in the atmosphere, and a TEN-E consistent with the climate neutrality objective cannot offer funding to fossil fuels projects, e.g. unabated fossil gas projects. While some stakeholders argue that investments into gas interconnectors through a PCI can contribute to the achievement of climate targets when proven to facilitate a shift from coal to gas, this is a hollow argument not taking into consideration the risk of fossil fuel PCIs competing for limited funding with i.e. electricity PCIs that facilitate installations based on Renewable Energy sources.

**In order to align TEN-E with the EU Green Deal, we therefore ask the European Commission only to consider funding for projects which meet the criteria outlined in the Sustainable Finance Taxonomy, as outlined by its Technical Expert Group.** We cannot continue to term projects relying on fossil fuels as “Projects of Common Interest” when they are in direct contrast, and harmful, to emission reduction plans to reach climate neutrality by 2050. This is in line with the 2018 evaluation of the TEN-E Regulation published by Trinomics. The report acknowledges that the TEN-E’s actual contribution to reach the set climate and energy targets for 2020 is difficult to assess due to the continued inclusion of unabated fossil fuel infrastructure projects. We must ensure that the TEN-E Regulation has net-positive contribution to reaching the set emission reduction targets with the aim of reaching climate neutrality by 2050, for this to be the case unabated fossil fuel infrastructure projects must be excluded.

**Ways in which the TEN-E could be improved to exclude funding of fossil fuel infrastructure:**

- Amend Annex I (2) and (3) as well as Annex II (2) and (3). A revised TEN-E should clearly set out that gas and oil are **no longer** priority corridors, and can in turn not benefit from CEF funding – in line with the proposed EU Sustainable Finance Taxonomy

Europe is at the risk of missing a unique opportunity if continuing to invest in fossil fuel infrastructure not fit for the future, as opposed to investing in infrastructure directly contributing to decarbonisation and the target of climate neutrality by 2050.

**Which factors do you think have contributed to the achievement of the objectives? On the contrary, which factors have hindered the achievement of the objectives?:**

The reduced effect of the TEN-E is to a large extent due to the continued inclusion of fossil fuels PCIs, which reduces the overall positive impact of the TEN-E Regulation on the set objectives. The inclusion of cross-border carbon dioxide networks, on the other hand, effectively contributes positively to all listed objectives, but should be revised to also include CO2 storage.

**To what extent do you agree with the following statements concerning the financing of energy infrastructure projects? (the regulation helped to finance energy infrastructure projects by..)**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
<b>Making financing instruments available to finance PCIs</b>	<b>X</b>					
<b>Increasing financing capacities of TSOs (ability to raise debt at a reasonable cost, ability to attract new institutional investors)</b>			<b>X</b>			
<b>Providing targeted EU financing under the Connecting Europe facility</b>	<b>X</b>					
<b>Other (please describe)</b>						<b>X</b>

**a. PERMIT GRANTING PROCESS**

***This section contains several questions that are not relevant for Bellona Europa’s work in connection with the TEN-E Regulation and the PCIs. We recommend all stakeholders and actors with relevant experience on these points to fill in the questionnaire accordingly.***

**b. PUBLIC CONSULTATIONS**

***This section contains several questions that are not relevant for Bellona Europa’s work in connection with the TEN-E Regulation and the PCIs. We recommend all stakeholders and actors with relevant experience on these points to fill in the questionnaire accordingly.***

**C. THE PCI SELECTION PROCESS**

**To what extent do you agree with the following statements concerning the PCI selection process?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
<b>PCIs selected are the most relevant projects to the fulfilment of the TEN-E objectives</b>				<b>X</b>		
<b>Cost-benefit assessments for the selection of PCIs are using an appropriate methodology</b>				<b>X</b>		

**Bellona Europa Explanation:** Several of the selected PCIs are relevant for the fulfilment of the TEN-E objectives. The continued inclusion of fossil fuel PCIs and the exclusion of CO2 storage is, however, a non-sensical approach that reduces the overall impact of the TEN-E Regulation to meet its objectives. The cost-benefit assessment (CBA) methodology, currently does not take sufficient account of climate risks or costs and fails to incorporate the full scale of the opportunity costs when assessing investments into fossil fuel PCIs. Additionally, there is still a lack of sufficient transparency related to projects’ ESG impacts, and efforts are needed to reduce the administrative costs throughout the selection process. Further efforts are needed to revise the current methodology. Bellona Europa therefore recommends that the ongoing revision of the TEN-E regulation also extend its scope to the CBA methodology if not already included. This recommendation was already brought forward by the Trinomics (2018) evaluation report of the TEN-E Regulation in 2018.

**To what extent do you agree that the role of the different actors listed below is adequate in the selection process?**

	<i>The role is adequate</i>	<i>The role should be weakened</i>	<i>The role should be strengthened</i>	<i>Do not know</i>
<b>European Network of Transmission Systems Operators for Electricity and Gas (ENTSO-E/ENTSO-G)</b>		<b>X</b>		
<b>Agency for the cooperation of Energy Regulators (ACER)</b>	<b>X</b>			
<b>European Commission</b>	<b>X</b>			
<b>Regional Groups</b>	<b>X</b>			
<b>National Regulatory Authorities (NRA)</b>	<b>X</b>			
<b>National Competent Authorities (NCA)</b>	<b>X</b>			
<b>Transmission System Operators (TSO)</b>		<b>X</b>		

Distribution system operators (DSO)	X			
Other stakeholders (NGOs, energy industry, telecom companies, trade associations, finance community, etc)			X	

**Please explain your answers and, if applicable, elaborate on how the role of actors should change:** As outlined by Bellona Europa in its February 2020 article [“How the gas lobby is making electricity grids irrelevant”](#), we are concerned of the composition of ENTSOs and their areas of responsibilities. The leading role of the ENTSOs are leading to conflicts of interest as infrastructure owners are in effect determining the demand scenarios and infrastructure needs of the future (through the TYNDPs). With some companies being present in both ENTSO-E and ENTSO-G, we see a financial overweight of gas over electricity, resulting in a bias towards gas infrastructure.

Aligned with Bellona Europa’s recommendation to exclude fossil fuel PCIs, the PCI selection process should balance out the role of ENTSO-G and reduce the observed bias towards gas infrastructure in both ENTSOs. It is Bellona Europa’s recommendation that the role of other stakeholders, including experts and NGOs, are strengthened in parallel to weakening or significantly restructuring the composition of the ENTSOs. This recommendation is supported by the Trinomics 2018 evaluation report, which acknowledges that NGOs have played an important role in evaluating the TYNDPs estimates (published by the ENTSOs) –found to overestimate expected levels of future gas demand, which could in turn be used as a justification for further investment into gas infrastructure. Strengthening the role of other stakeholders thus functions as both checks and balances to the current flawed system, but only if done in parallel to a reformation of the current system.

**To what extent do you agree with the following statements concerning the gas and electricity EU-wide TEN-Year Network Development Plans (TYNDPs)?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
The current framework is fit for purpose				X		
The electricity and gas market and network models are sufficiently interlinked (e.g. scenarios and cost-benefit assessment)					X	
The current framework does sufficiently match the need for system integration, i.e. the consideration of sectors other than gas and electricity				X		
The TYNDPs do reflect enough coordination with distribution level networks				X		
The relevant actors are involved in the TYNDP processes and their respective roles are adequate					X	
The TYNDP do reflect sufficiently energy efficiency aspects				X		

**Bellona Europa Explanation:** The ENTSOs collective publication of TYNDPs under the ambiguous concept of sector coupling has resulted in TYNDPs biased towards gas and gas infrastructure development, with a much-diminished role for electrification. In practise, there is a financial overweight of gas over electricity within the ENTSOs. The joint publication of the TYNDPs by the ENTSOs has shown that the interests of ENTSO-G dominate, to the detriment of ENTSO-E and the EU’s climate ambitions. It is evident that the deployment of renewable energy must be rapid and extensive. The monumental challenge of deploying enough renewable energy must not be compromised by false solutions promoted by the gas industry. Deploying wide-scale electricity transmission infrastructure must be prioritised if we are to have any hope of meeting the EU’s net-zero target. While the TYNDPs are a good starting point for planning trans-European energy infrastructure, the current composition and function of the ENTSOs reduces their reliability and legitimacy – to the detriment of quality estimates of future energy needs and demands on which current investments rely. We risk investing in stranded assets and facilitating continued use of fossil fuels not in line with future needs or demand. This was supported by the Trinomics Evaluation study already in 2018, stating that: “the current scenario approach for the TYNDPs for gas is not optimal; all projects are assessed against a rather conservative reference scenario, which increases the risk for stranded investments”.

**To what extent do you agree with the following statements on the selection criteria for projects of common interest?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
<b>The general selection criteria are appropriate</b>				X		
<b>The specific selection criteria for electricity transmission projects are appropriate</b>		X				
<b>The specific selection criteria for gas projects are appropriate</b>					X	
<b>The specific selection criteria for electricity smart grid projects are appropriate</b>		X				
<b>The Specific selection criteria for carbon dioxide transport projects are appropriate</b>				X		

**If you disagree, please specify changed you consider necessary:** As outlined in detail, Bellona Europa recommends that the revised TEN-E regulation exclude fossil fuel projects, and amend the current text to include both CO2 transport *and storage*. Our full recommendations are given above, as well as in the accompanying position paper. It is in light of these needed adjustments that Bellona Europa rank the general selection criteria as not appropriate.

**To what extent do you agree that projects of mutual interest with third countries should be included in the revised TEN-E framework?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
Projects of mutual interest, i.e. projects with third country that benefit only one member state, should remain outside the TEN-E framework				X		
Projects of mutual interest should be included in the TEN-E framework...		X				
...subject to specific eligibility and selection criteria,		X				
...subject to a specific selection process	X					
...subject to specific conditions for regulatory measures and access to financial assistance would apply.		X				

**d. GOVERNANCE AND THE ROLES OF DIFFERENT ACTORS**

**To what extent do you agree with the following statements concerning the effectiveness of the PCI monitoring and implementation planning procedures?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
Current reporting and monitoring procedures on the PCI progress (popup box: i.e. activity status reports, acer monitoring reports, transparency platform etc.) are sufficient to ensure transparency on PCI development				X		
PCIs implementation plans and the regular updates ensure timely project implementation				X		

**Bellona Europa Explanation:** It is necessary to improve estimates, transparency and monitoring/reporting of the environmental, social and climate effects of PCIs.

**To what extent do you agree with the following statements concerning governance?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
The Regional Group model enables regional cooperation			X			

High Level Groups provide added value through strategic steering and political guidance as well as monitoring the PCIs in the priority regions		X			
It is effective that NRAs are responsible for CBCA decisions			X		

**Please share your suggestions with regard to improvements in the governance process:** CBCA decisions need to better incorporate externalities related to climate and in particular opportunity costs of alternative investments with higher emission reduction potential.

**e. CROSS-BORDER COST ALLOCATION**

**In your opinion, what are the main reasons for project promoters to request a CBCA decision?**

The 2018 Trinomics evaluation study of the TEN-E Regulation found that CBCA decisions are not used as intended, but rather as a stepping stone towards access and CEF funding. The CBCA should take environmental, social and climate aspects and effects/costs into greater account.

**To what extent would you agree that CBCA decision processes and outcomes enable effective investment decisions?**

→ **Disagree**

**Please explain your answer, possibly comparing with other means of taking CBCA decisions:** The CBCA mechanism does not currently have the desired effect, and are mostly used as a gateway to CEF funding. It must be revised to sufficiently include environmental, social and climate effects/costs.

**f. INVESTMENT INCENTIVES**

*According to Article 13 of the TEN-E Regulation, incentives can be provided for PCIs which are exposed to higher risks than normally incurred by a similar infrastructure project, and for which a net positive impact is confirmed by the CBA.*

**To what extent would you agree that investment incentives enable effective investments in PCIs?**

- **Agree**

**Please explain your answer:** Although Bellona Europa agrees that general investment incentives enable effective investments in PCIs, changes are needed as it pertains to the recommended exclusion of fossil fuels and the inclusion of CO2 transport *and storage*.

**(ii) EFFICIENCY OF THE REGULATION**

The evaluation of the efficiency of the Regulation considers the extent to which the resources used to implement the Regulation and achieve its objectives are used as efficiently as possible (with lowest possible resources /costs). In the case of the TEN-E Regulation, this mainly relates to the costs and benefits for NRAs and project promoters with regards to the implementation of the Regulation.

**To what extent do you agree that the benefits of the provisions in the TEN-E Regulation outweigh the costs?**

- **Agree**

**Please explain your answer:** Although the TEN-E offers a range of benefits, these are substantial reduced by the continued inclusion of fossil fuels.

**Could you identify any opportunities to simplify the legislation or reduce unnecessary costs without undermining the intended objectives of the regulation?**

Bellona Europa recommends that the revised TEN-E excludes fossil fuels and include CO2 transport *and storage*.

**To what extent do you agree that the current reporting and monitoring procedures on the PCI progress can be simplified and still fulfil their purpose?**

- **Agree**

**(iii) RELEVANCE OF THE REGULATION**

The evaluation of the relevance of the TEN-E Regulation assesses the extent to which the TEN-E Regulation and its objectives appropriately respond to the changes in energy infrastructure needs and in the policy context (such as the climate neutrality objective under the European Green Deal).

**To what extent do you agree that the following issues are currently well addressed by the Regulation?**

	Completely Agree	Agree	Neither Agree or disagree	Disagree	Completely disagree	Do not know
Integration of renewable energy sources into the electricity network				X		
Integration of renewable energy sources into the gas network				X		
Support of electrification of transport through appropriate grid infrastructure			X			
Smart Sector Integration				X		
Energy transition for fossil fuel regions			X			

Climate change mitigation					X	
Climate resilience of energy infrastructure					X	
Improving energy efficiency of the energy system					X	

If you clicked “completely disagree” or “disagree”: How do you think the Regulation should change to better address these issues?

The regulation must exclude fossil fuel PCIs and include CO2 transport *and storage* PCIs.

**To what extent would you agree that the TEN-E Regulation has been relevant in supporting the development of the following infrastructure categories?**

	Completely Agree	Agree	Neither Agree or disagree	Disagree	Completely disagree	Do not know
High-voltage overhead transmission lines						X
Electricity storage facilities		X				
Safety and efficiency installations for electricity		X				
Smart grids		X				
Transmission pipelines for natural gas and biogas		X				
Underground gas storage facilities		X				
Reception, storage and regasification or decompression of liquefied natural gas (LNG) or compressed		X				
Natural gas (CNG)		X				
Safety and efficiency installations for gas		X				
Dedicated carbon dioxide pipelines				X		
Facilities for liquefaction of carbon dioxide and buffer storage				X		
Safety and efficiency installations for carbon dioxide				X		

**Bellona Europa Explanation:** The current TEN-E has disproportionately supported the development of natural gas transport and storage over CO2 transport and storage – not in line with the EU climate ambition or the set target of climate neutrality by 2050. Great strides have been made in the areas of electricity transmissions and interconnectors, but more work remains to reach the set targets. We therefore see a great need for the continuation of a revised TEN-E Regulation excluding fossil fuel PCIs.

Which of the challenges would you say are the most important to address in the field of energy infrastructure today, compared to the situation in 2013?

Please select up to 3 most important challenges.

- Greenhouse gas emission reductions/climate neutrality
- Integration of renewable energy sources
- Other (please specify): CO2 transport and storage and exclusion of fossil fuels

Which of the challenges would you say are least important to address in the field of energy infrastructure today, compared to the situation in 2013?

Please select up to 3 least important challenges.

- Permit-granting procedures
- Public opposition to projects
- Energy financing capacity of TSOs

Which features do you consider the most important for a project of common interest (PCI) as part of trans-European energy network?

	<i>Important</i>	<i>Important to a large extent</i>	<i>Important to a small extent</i>	<i>Not important</i>	<i>Do not know</i>
Integration of renewable energy sources into the grid	X				
Contribution to greenhouse gas emission reduction/ fully consistent with climate neutrality by 2050	X				
Security of supply	X				
Market integration (e.g. to reduce infrastructural deficits and increase system flexibility)	X				
Increase competition on the market		X			
Innovation	X				
Environmental due diligence in the preparation, permitting and implementing of project		X			
Generation of direct benefits to the local communities	X				

**Bellona Europa Explanation:** It is the collective and parallel efforts to reach all objectives above which will ensure the successful development of the Trans-European Energy Network. The TEN-E Regulation must, however, be updated to ensure that all PCIs are in line with the climate neutrality target by 2050. To this end, the Sustainable Finance Taxonomy needs to form the basis of the criteria of what constitutes a PCI. Not least, the Do No Significant Harm (DNSH) principle should be incorporated to ensure a holistic approach that ensures real climate mitigation efforts and decarbonisation across all PCIs. This is also the reason why Bellona Europa strongly recommend the exclusion of unabated fossil fuel infrastructure from the TEN-E Regulation and PCI selection criteria.

**Which of the following infrastructure categories do you consider relevant for the regulatory network framework on trans-European energy networks?**

	<i>Relevant</i>	<i>Relevant to a large extent</i>	<i>Relevant to a small extent</i>	<i>Not Relevant</i>	<i>Do not know</i>
Electricity infrastructure (transmission lines and storage)	X				
Grids for offshore renewable energy	X				
Smart electricity grids	X				
Smart gas grids				X	
Natural gas infrastructure (pipelines and storage)				X	
Liquefied Natural Gas (LNG) terminals				X	
Dedicated hydrogen (H2) networks	X				
Infrastructure for the integration of renewable and carbon neutral gases			X		
Power to gas installations			X		
CO2 networks (for transporting CO2)	X				
Geological storage of CO2	X				

**Bellona Europa Explanation:** *Bellona Europa highlight the importance of the two last objectives in the table: “CO2 networks for transporting CO2” and “Geological Storage of CO2”. The two objectives have great potential to facilitate job retention and growth across sectors, as well as aiding carbon dioxide removal. It is therefore vital that the revised TEN-E Regulation ensures and enable the development of CO2 transport infrastructure that can serve many different industries, offering optionality of decarbonisation across sectors, and preserve existing industrial clusters. This point has been further elaborated on in the Bellona Europa TEN-E Position Paper.*

*It is, as outlined in the referenced Bellona Europa position paper, our strong recommendation that a revised TEN-E Regulation exclude all unabated fossil fuel infrastructure projects. This is vital in the context of aligning the TEN-E Regulation with the European Union’s new Climate ambition, the Paris Agreement and the EGD. As outlined also in the Trinomics Evaluation Study from 2018: “The priority corridors and areas as well as the eligibility criteria seem no longer (to) follow the evolution of the energy system and the “new” policy priorities. In particular the need for supporting oil and gas transmission projects may merit a revision in the context of the long-term decarbonisation pathway”. This is why Bellona has ranked several of the infrastructure categories above as not relevant.*

*The revised TEN-E Regulation must facilitate and ensure further expansion of electricity transmission grids. This is why Bellona Europa has ranked the two categories of “infrastructure for the integration of renewable and carbon neutral gases” and “power to gas installations” as relevant to a smaller extent.*

Terminology is key, as illustrated by recent gas industry efforts to throw “renewable” and “decarbonised” gas into a confusing mix. Different types of gas requires much different types of infrastructure, something not reflected in the current conversation. We cannot allow the monumental challenge of deploying enough renewable energy to be compromised by false solution promoted by and for the sole benefit of the gas industry. We therefore request further clarity and detail as to what is included when speaking of “renewable and carbon neutral gases” – as it has great consequences for the actual, if any, decarbonisation effects of investment into the two aforementioned infrastructure categories.

It is important to clarify and establish that the two aforementioned infrastructure categories are far more expensive and inefficient pathways and will be limited to sectors of the economy that have no other scalable and viable solutions. Bellona has already outlined its recommendation in its February 2020 article: [“How the gas lobby is making electricity grids irrelevant”](#). There is a greater need for wide-scale expansion of electricity transmission grids rather than encouraging a redirection of investments into the two aforementioned categories. Such redirection of investments risk prolonging the use of natural gas through stranded assets, resulting in emissions lock-in. Investments in the other presented infrastructure categories listed as relevant by Bellona Europa, are better options aligning the revised TEN-E Regulation with the target of climate neutrality by 2050.

For more on Bellona’s work on the decarbonisation of Industry see our 2018 [An Industry’s Guide to Climate Action](#)

For more on Bellona’s work and reports on Carbon Dioxide Removal see our website on the Negative Emissions Projects ([NEGEM](#))

**To what extent do you agree with the following statements concerning priority corridors and thematic areas?**

	Completely Agree	Agree	Neither Agree or disagree	Disagree	Completely disagree	Do not know
Priority Corridors reflect the current infrastructure needs				X		
Priority corridors are fit for purpose for future challenges to energy infrastructure				X		
Priority thematic areas reflect the current infrastructure needs				X		
Priority thematic areas are fit for purpose for future challenges to the energy infrastructure				X		

**Please explain your answer:** The current TEN-E Regulation’s continued inclusion of fossil fuels in the priority corridors does not reflect the current infrastructure needs, and are not fit for purpose for future challenges to energy infrastructure. For the priority thematic areas to reflect the current infrastructure needs and be fit for purpose for future challenges to the energy infrastructure, the TEN-E Regulation can no longer exclude CO2 storage.

**(iv) COHERENCE**

Coherence is about the extent to which the objectives and the implementation of the activities related to the Regulation are non-contradictory (internal coherence), and do not contradict other activities with similar objectives (external coherence). Questions relate to whether there are any internal inconsistencies in the Regulation itself, as well as the degree to which it is coherent with other (EU) initiatives with similar objectives and its situation in the wider EU energy policy field.

**Can you identify any overlaps, inconsistencies within the TEN-E Regulation (including in its measures and objectives)?**

- **Yes, there are overlaps, inconsistencies or incoherencies**

**Please specify your answer, if possible, mentioning specific overlap or inconsistent/incoherent measures of the regulation:**

As outlined, the current TEN-E does not align with the overall EU climate ambition and emission reduction targets. A continued inclusion of fossil fuels is completely inconsistent with the Paris Agreement and the target of climate neutrality by 2050. Additionally, the important role set to be played by CCS to reach the set targets is not reflected through the current exclusion of CO2 storage PCIs.

**Please state your opinion on the following statements regarding the consistency between the TEN-E Regulation and other policies/initiatives at EU, international, and national level**

	<i>Inconsistencies, or conflicts with the Regulation</i>	<i>Consistent with the regulation</i>	<i>Do not know</i>
<b>The Clean Energy Package/ the Energy Union</b>	X		
<b>The European Green Deal/ Long Term Strategy for Decarbonisation</b>	X		
<b>Trans-European networks (TEN-T)</b>	X		
<b>EU environmental acquis (habitat, water, etc)</b>	X		
<b>EU digital strategy</b>		X	
<b>EU Industrial strategy</b>	X		
<b>Paris Agreement</b>	X		
<b>UN Sustainable Development Goals</b>	X		
<b>Commission communication on a stronger renewed strategic partnership with the EU's outermost regions (COM(2017)623 final)</b>			X
<b>EU neighbourhood policy</b>	X		

**Please specify your answer, if possible, mentioning specific measures of the Regulation:** The current state of the TEN-E does not reflect the EU climate ambition level of emission reduction targets. Bellona Europa’s response above reflects the areas where the TEN-E Regulation must be revised to better reflect this point. The current state of the TEN-T and TEN-E overlap on certain areas such as the “promotion of low-carbon transport with the aim of achieving by 2050 a significant reduction in CO2 emissions, in line with the relevant Union CO2 reduction targets” (TEN-T, Article 4c (iii)). As such, there is a need to further identify what this overlap needs in practice, and to what extent PCIs involved on CO2 transport and storage should be applying for funding under TEN-E or TEN-T. As a general point, Bellona Europa believes the important role to be played by CCS should be reflected in both TENs, and see great potential EU added value if relevant PCIs can apply both for funding under the TEN-T and TEN-E when it comes to CO2 transport and storage.

**(v) EU ADDED VALUE OF THE REGULATION**

*EU added value concerns the extent to which changes can reasonably be argued to be a result of the EU intervention, over and above what could reasonably have been expected from national actions. Thus, it considers whether and to the extent to which it is justified in terms of the results it brought about compared to what could have been achieved by Member States themselves; and the extent to which the issues addressed by the TEN-E Regulation still require EU intervention (or, in other words, what the consequence of stopping the EU intervention would be).*

**What do you think has been the EU added value of the TEN-E Regulation, compared to what could have been achieved if legislation on energy infrastructure networks only existed at national or regional level?**

- **Cooperation gains**
- **Improved regulatory certainty**
- **Certain projects could not have been implemented otherwise**
- **Access to financing (e.g. Connecting Europe Facility)**

**Please specify your answer:** The EU added value of the TEN-E Regulation is evident for the points marked above. Notably, there is a great need for the current revision of the TEN-E regulation to ensure that the regulation is in compliance with environmental requirements and targets, currently not the case.

**Would the same results have been achieved legislating at national and/or regional level?**

	<i>Completely Agree</i>	<i>Agree</i>	<i>Neither Agree or disagree</i>	<i>Disagree</i>	<i>Completely disagree</i>	<i>Do not know</i>
<b>The TEN-E Regulation has achieved more results than what could have been achieved legislating at national and/or regional level</b>	<b>X</b>					
<b>The issues addressed by the TEN-E Regulation continue to require action at EU level</b>	<b>X</b>					

**Bellona Europa Explanation:** Infrastructure is the lynchpin of economic development, and without low-carbon infrastructure the transition to a low-carbon world will significantly slow down, if feasible at all. The European Union has a natural role to coordinate low-carbon infrastructure development. And planning strategic low-carbon infrastructure on a European-wide scale is much more efficient than Member States acting independently. The issues addressed by the TEN-E regulation continue to require action at EU level. In particular, geological storage sites are not evenly distributed amongst member states, and the development and large-scale deployment of cross-border European CO2 transport and storage infrastructure is crucial to reach the set target of climate neutrality by 2050. The infrastructure will enable clean, competitive energy and industrial sectors as well as early large-scale clean hydrogen and the delivery of significant volumes of carbon emission reductions and removals.

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