

CONSULTATION RESPONSE

REPowerEU chapters in Recovery and Resilience Plans

BELLONA
E U R O P A

Consultation response

Energy – updating EU legislation to make the EU independent from Russian fossil fuels (REPowerEU)

Bellona Europa welcomes the ongoing efforts by the European Commission and the opportunity to provide recommendations on the REPowerEU update to the Recovery and Resilience plans.

We welcome the REPowerEU initiative of the EU to reduce its dependence on fossil gas, finally moving towards both climate goals and energy security. Together with other decarbonisation strategies, REPowerEU should be designed to kickstart additional renewable energy deployment and focus on energy efficiency to create a more resilient and clean energy system.

The following sections of the consultation response outline our recommendations on the contribution of Recovery and Resilience Plans to the specific REPowerEU objectives outlined in Article 21c.

The fossil fuel focus needs to be on a strictly temporary basis, no additional infrastructure is needed

- *“Article 21c, (1)(a) improving energy infrastructure and facilities to meet immediate security of supply needs for oil and gas, notably to enable diversification of supply in the interest of the Union as a whole.”*

In the last year, the EU has enabled both private and public funding for fossil gas – despite the narrative that a gas phase-out is necessary for both energy security and climate goals. While the Taxonomy has enabled the [greenwashing of fossil gas](#) for the private sector, REPowerEU has opened the doors for additional public funding for the oil and gas sector.

However, unabated fossil gas and its corresponding infrastructure should not be supported by European funding.

While a diversification of fuel sources is necessary in the short run, the investments into new fossil fuel infrastructure should be minimised as much as possible. Our [analysis](#) done in collaboration with RAP, Ember and E3G, shows that new gas import infrastructure is not required. Alternatively sourcing 51 bcm of gas imports via existing assets is possible.

Any existing fossil fuelled power plants cannot continue emitting greenhouse gases into the atmosphere under the guise of energy security. While technologies such as carbon capture and storage (CCS) have a role to play in reducing those emissions, relying on them without a clear plan to deliver on them should not be an acceptable proof of carbon neutrality.

Boosting energy efficiency and renewable generation is key: inefficient uses of energy and electricity need to be further down the list

- *“Article 21c, (1) (b) boosting energy efficiency in buildings, decarbonising industry, increasing production and uptake of sustainable biomethane and renewable or fossil-free hydrogen and increasing the share of renewable energy,”*

Increasing renewable energy generation and getting more use out of each tWh or MJ produced [are the key elements](#) of a resilient and clean energy system.

By prioritising technologies that are inefficient at displacing gas, the European Union is missing the opportunity to free itself from Russian gas quickly and cheaply. Our analysis shows that the direct use of renewable electricity would displace most gas used today and should therefore be prioritised.

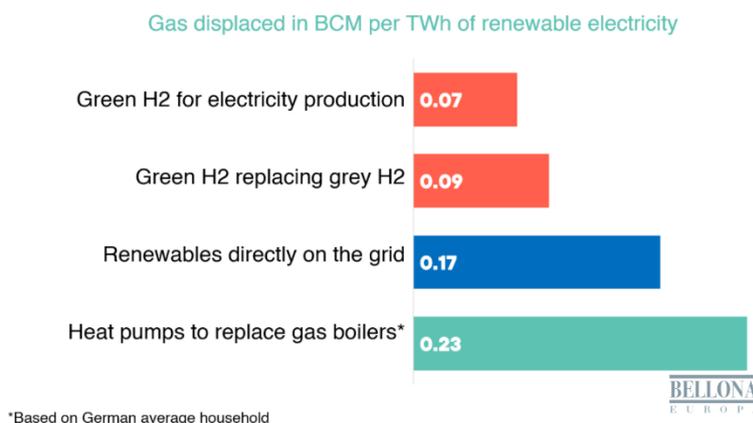


Figure 1: Efficient and direct use of renewable electricity reduces fossil gas use the most ([Bellona analysis](#)).

For the production of energy carriers such as hydrogen, methodologies need to ensure that renewable electricity is used to prevent a further demand for fossil gas. If managed incorrectly and without an additionality requirement, the production of hydrogen in Europe could [increase fossil gas consumption](#) and be counterproductive to REPowerEU objectives.

Cross border infrastructure is crucial

- “Article 21c, (1) (c) addressing internal and cross-border energy transmission bottlenecks and supporting zero emission transport and its infrastructure, including railways”

We welcome the initiative to focus on cross-border infrastructure, since there are many bottlenecks there which need to be addressed to optimise the transfer of energy.

In terms of cross-border projects, we would also like to underline the importance of other cross-border infrastructure that will enable emission reductions in large industrial clusters, such as the multi-modal [CO₂ transport](#) and [CO₂ storage](#) infrastructure.

Re-skilling of the workforce needed and welcome

- “Article 21c, (1) (d) supporting the objectives in points (a), (b) and (c) through an accelerated requalification of the workforce towards green skills, as well as support of the value chains in key materials and technologies linked to the green transition.”

The focus on the accelerated requalification of the workforce is a key element of the transition to a resilient and clean energy system. For processes [such as permit-granting](#), there is a need to allocate and requalify some of the workforce in order to speed energy transition. Such bottlenecks can not only be tackled with the right incentives, but can also provide new working opportunities and increase social support for climate measures.

The Do No Significant Harm (DNSH) criteria should not be circumvented

- “(4) By way of derogation from Articles 5(2), 17(4), 18(4) point (d) and 19(3) points (d), the principle of “do no significant harm” within the meaning of Article 17 of Regulation (EU) 2020/852 shall not apply to the reforms and investments expected to contribute to the REPowerEU objectives under paragraph 1, point (a) of this Article.”

The DNSH criteria are [already problematic](#) and may not ensure that no significant harm was done by a given project or technology. Removing them altogether creates a higher risk of potential issues and waters down the proposal even further.

Recommended amendments to the Delegated act on GHG methodology

Draft text	Recommended changes	Justification
Article 21c		
<i>(a) improving energy infrastructure and facilities to meet immediate security of supply needs for oil and gas, notably to enable diversification of supply in the interest of the Union as a whole.</i>	<i>(a) improving energy infrastructure and facilities to meet immediate security of supply needs for oil and gas, notably to enable diversification of supply in the interest of the Union as a whole.</i>	While diversification of fuel sources is necessary, new investments in fossil oil and gas infrastructure is not justified.
<i>(b) boosting energy efficiency in buildings, decarbonising industry, increasing production and uptake of sustainable biomethane and renewable or fossil-free hydrogen and increasing the share of renewable energy</i>	<i>(b) increasing the share of renewable energy generation, boosting energy efficiency in buildings and other sectors, decarbonising industry, increasing sustainable production and uptake of sustainable biomethane, renewable or fossil-free hydrogen where needed and deploying the matching additional renewable energy sources</i>	To reach REPowerEU goals, point (b) should focus on additional renewable energy generation and efficient use of that energy. Direct use of electricity, fuel targets gauged according to available resources and their targeted use are all key pieces of an optimised energy system.
<i>(4) By way of derogation from Articles 5(2), 17(4), 18(4) point (d) and 19(3) points (d), the principle of “do no significant harm” within the meaning of Article 17 of Regulation (EU) 2020/852 shall not apply to the reforms and investments expected to contribute to the REPowerEU objectives under paragraph 1, point (a) of this Article.</i>	<i>(4) By way of derogation from Articles 5(2), 17(4), 18(4) point (d) and 19(3) points (d), the principle of “do no significant harm” within the meaning of Article 17 of Regulation (EU) 2020/852 shall not apply to the reforms and investments expected to contribute to the REPowerEU objectives under paragraph 1, point (a) of this Article.</i>	Supported projects should be subject to DNSH criteria and other environmental safeguards. If not, they could lead to additional emissions and other adverse effects.

References:

- Bellona op-ed in Euractiv on creating independence from fossil gas: <https://www.euractiv.com/section/energy/opinion/how-europe-can-reduce-its-dependence-on-fossil-gas/>
- TEN-E position: <https://bellona.org/publication/brief-ten-e-missing-puzzle-piece-on-pathway-to-net-zero>
- TEN-T position: <https://bellona.org/publication/consultation-response-amended-proposal-trans-european-transport-network-ten-t-revised-guidelines>
- Permitting Consultation response: <https://bellona.org/publication/consultation-response-renewable-permit-granting-processes>
- Taxonomy CDA position: <https://bellona.org/publication/taxonomy-cda-greenwashed-fossil-gas-as-a-bridge-to-nowhere-stands-to-only-benefit-a-handful-of-countries-leaving-crucial-cee-region-behind>
- RFNBO and RCF production consultation response: <https://bellona.org/publication/consultation-response-rules-for-rfnbo-and-rcf-production>
- REPowerEU analysis: <https://bellona.org/publication/using-repowereu-to-its-full-potential>

Other sources:

- IEA 10point plan to reduce reliance on Russian gas: <https://www.iea.org/reports/a-10-point-plan-to-reduce-the-european-unions-reliance-on-russian-natural-gas>

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