

Below is the contribution of Not Here, Not Anywhere (NHNA) to the public consultation on the proposed amendments to the TEN-E regulation. Not Here, Not Anywhere are an Irish nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland. We advocate for a just transition to renewable energy systems both in Ireland and around the world.

NHNA welcomes the proposal to remove support for oil and natural gas infrastructure from TEN-E.

However, NHNA have a number of concerns with the proposed amendments.

It is imperative that across the EU the phase out of all fossil fuels begins immediately, and that no new fossil fuel infrastructure be built. It is clear that locking in any burning of fossil or other fuels that emit greenhouse gases is incompatible with keeping global warming to below 1.5 degrees celsius above pre-industrial levels. This must be properly reflected in the revised TEN-E regulation.

NHNA is concerned with proposed significant support through TEN-E for hydrogen, “smart gas” and “power to gas” projects.

Support for hydrogen must not amount to “back door” support for fossil fuels, through support for hydrogen generated via the burning of oil, coal or gas. Any hydrogen or “power to gas” projects supported through TEN-E must ensure that all hydrogen is produced via 100% renewable energy. The need of some specific sectors for hydrogen does not justify further investments in building fossil fuel infrastructure.

All proposed support for gas must be removed from the TEN-E amendments. The explanatory memorandum makes continued reference to “low carbon gases” and in one case “green gas”. Burning of any methane gases, including biogas and biomethane, should not be supported by forward-looking EU regulations like TEN-E. The chance must be taken now to quickly for TEN-E to drive towards a climate resilient energy system generating 100% renewable energy. Back door support for methane gases, either through hydrogen generation or “smart gas grids” is incompatible with this.

Finally, the conflict of interest associated with the involvement of ENTSO-G in the development of TEN-E regulation must be revised and governance of TEN-E must become more independent and science based.

Thank you.