# The Great Gas Lock-in

## Industry lobbying behind the EU push for new gas infrastructure

CEO

**Gas industry lobbying means Europe could be locked into 40-50 more years of dependency on fossil fuels.** The gas industry spent more than €100m in 2016 on lobbying, while public interest groups working against an expansion of gas infrastructure spent barely three per cent of that amount. As a result the EU has bought the industry spin that gas is a 'clean' fuel to partner renewables. Rather than transforming the energy system towards wind, sun, and wave power and reducing energy use, the might of the gas lobby has ensured that the Commission and national governments are underwriting a veritable industry wish list of often controversial new gas infrastructure projects. In doing so it is breaking its own climate change commitments under the Paris Agreement and locking Europe and its suppliers into 40-50 more years of pipelines and other gas infrastructure. The consequences for the climate, local communities, and their environments all along the gas supply chain are dire.

# Contents



**List of graphics**




Corporate Europe Observatory is a research and campaign group working to expose and challenge the disproportionate influence that corporations and their lobbyists exert over EU policy-making.





October 2017

Published by
Corporate Europe Observatory



Written by
Belén Balanyá &
Pascoe Sabido

Edited by
Katharine Ainger &
Ronnie Hall



With thanks to
Vicky Cann
Margarida da Silva
Samuel Martin-Sosa
Elena Gerebizza
Fabian Huebner
Frida Kieninger
Alfons Pérez
Olivier Petitjean
Oscar Reyes
Antoine Simon
Xavier Sol

# Introduction

Their goal is to keep Europe hooked on fossil fuels, so their business model can continue for a few more decades. They borrow the garb of the renewables lobby to present themselves as a 'clean' fuel of the future. They pay an army of lobbyists, PR merchants, law firms, think tanks, and trade associations to influence decision-makers. They talk about energy security, while ignoring the insecurity that climate change will bring. They are the European gas industry lobby, with seeming powers to write an infrastructure wish-list and have the EU grant it.

New research by Corporate Europe Observatory shows the gas lobby is a force to be reckoned with in Brussels, spending over €100 million in 2016. More than 1,000 lobbyists were deployed in the gas industry's pay, and 460 meetings secured with the two Commissioners in charge of Climate and Energy policy in the last two and a half years.[1]

By contrast, public interest groups working to stop a generation of new gas infrastructure spent just three per cent (€3.4m) of the industry's lobbying budget. They have one tenth of the lobbyists (101) and secured one ninth of the meetings (51) with Commissioner for Climate and Energy Miguel Arias Cañete and Vice-President for Energy Union Maroš Šefčovič.

> **The gas lobby is a force to be reckoned with in Brussels, spending over €100 million in 2016**

However, the gas industry is willingly helped by the European Commission and national governments. The European institutions even created their own gas industry lobby group (SEE ENTSO-G SECTION), tasking it with projecting future gas demand (which it consistently over-estimates) and proposing the pipelines and Liquified Natural Gas (LNG, chilled to a liquid for transporting) terminals to meet this inflated demand. In response the EU and national governments then provide the group's members with the political and financial support to build the infrastructure: a kind of wish list granting.

Publicly the gas industry claims its fossil fuel is 'clean' and 'renewable', providing a 'bridge to the future', or a 'partner' to unreliable renewable energy (SEE BOX 5, THE FABLE OF 'CLEAN' GAS). Despite being far from reality, industry influence has seen the Commission and national governments embark on a multi-billion euro gas infrastructure building programme, intent on creating an integrated EU-wide gas market where industry and commodity traders can buy and sell gas in the blink of an

**BOX 1**

## Gas: A Bridge to Nowhere

Whether European or imported, the extraction and transport of both conventional and unconventional ('fracked') gas has severe social and environmental impacts which will only grow with the EU push for more gas infrastructure. Fracking, which requires high volumes of water and chemicals and pollutes aquifers, has particularly extreme impacts on local communities and the environment. As an anti-fracking activist in Algeria complains: "All the wealth is coming from under our feet, all those multinationals are coming into our country and we are not benefiting from it." [2]

Meanwhile, conventional gas extraction also has serious impacts. In the Netherlands, the government has been pressured to reduce gas extraction from the Groningen gas field after repeated earthquakes have damaged thousands of homes.[3] Another consequence of the push for gas infrastructure is the displacement of communities, for example along the route of pipelines. Campaign groups Platform and Re:Common have documented numerous violations of land rights along the route of the Euro-Caspian Mega Pipeline.[4] In Azerbaijan, where the pipeline begins, those attempting to denounce the project are met with repression and jail (SEE TAP CASE STUDY).

The impact on the climate is also huge. Despite being branded by industry as 'clean', or a 'bridge' towards renewable energy, gas is as bad if not worse than other fossil fuels. It is true that less carbon dioxide is emitted when burning gas compared to coal or oil, but natural gas is composed largely of methane, which, over a 10 year time frame, is over 100 times more potent than $CO_2$. It also leaks during production and transport at far higher rates than previously thought. As a result US scientist Robert Howarth concludes that "natural gas is a bridge to nowhere". Even if society eliminated $CO_2$ emissions tomorrow but ignored methane, Howarth argues, the planet would still warm to the dangerous 1.5ºC to 2ºC threshold within 15 to 35 years.[5]

eye. It is based on a list of 'Projects of Common Interest' (PCIs, projects prioritised by the EU with boosted political and logistical backing) proposed by industry, refined by governments and finalised by the Commission. The PCI bi-annual update should happen before the year is out (SEE BOX 2, THE EU, A WILLING PARTNER).

Behind the industry spin is a very different story. Gas is a climate-wrecking fossil fuel comparable or even worse for the climate than coal (SEE BOX 1, GAS: A BRIDGE TO NOWHERE). Meanwhile, communities and environments around extraction and infrastructure sites are being devastated, and many of the governments who are lined up to meet this supposed need for gas are involved in blatant human rights abuses, such as Azerbaijan (SEE TAP CASE STUDY). One geopolitical driver behind the new infrastructure push is to reduce dependence on Russia and its gas, but due to renewable energy and energy efficiency policies, among other things, the reality is gas demand in the EU is down 13 per cent compared to 2010,[6] while more than 75 per cent of existing LNG infrastructure sits unused.[7] According to the International Energy Agency, EU gas demand will have to fall another 40 per cent by 2040 if the EU is to meet its commitments made under the Paris Agreement at COP21, the 2015 UN climate talks.[8]

**One geopolitical driver behind the new infrastructure push is to reduce dependence on Russia and its gas, but due to renewable energy and energy efficiency policies, among other things, the reality is gas demand in the EU is down 13 per cent**

Therefore the EU should put a moratorium on all new gas infrastructure, rather than building assets which will either lock the continent and its suppliers into another 40-50 years of gas use, or prove to be huge financial liabilities and 'stranded assets' which have been paid for but are no longer usable, let alone profitable. It makes much more sense to pump the financial and political capital spent on gas PCI projects into wind, solar and wave energy and reducing energy use.

BOX 2

## The EU, a willing partner

The EU has proven highly responsive to pressure from industry and member states, providing policies that give gas significant legislative, political, and financial support.

**Energy Union:** From 2015, the overarching framework for energy policies and a Commission priority, aimed at creating an EU-wide gas market and reducing dependency on Russian gas, to make "energy secure, sustainable and affordable", especially in the wake of the Russia-Ukraine conflict and resulting gas crisis of 2005-2006. It provides key institutional support for new and controversial cross-border infrastructure such as the pipelines MidCat (SEE CASE STUDY), Euro Caspian Mega-Pipeline (ECMP SEE CASE STUDY), or Baltic Pipe.

**Trans-European Networks for Energy:** The TEN-E directive links the energy infrastructure of EU countries, including electricity, oil, and gas. Under the directive 'Projects of Common Interest' (PCI), cross-border infrastructure projects are chosen bi-annually and benefit from fast-tracking and potential EU funding from the Connecting Europe Facility (CEF). There are currently 77 gas projects, including pipelines TAP and MidCat (SEE CASE STUDIES) and massive LNG re-gasification terminals. The new selection is supposed to happen before the end of the year. The industry lobby group ENTSO-G (SEE ENTSO-G SECTION) plays a key role in deciding which projects become PCIs, along with the Commission and national governments.[9]

**Winter gas package:** The 2016 Commission proposal includes two policies of particular relevance for the gas industry. The Strategy for LNG and gas storage and the Regulation on measures to safeguard security of gas supply reinforce the push for gas by ensuring that more infrastructure is built to meet (overinflated) demand and potential future crises.

**Third Energy Package:** From 2009 this has been the overarching framework regulating the internal gas and electricity markets. Designed to open up markets in the EU, it de-linked energy suppliers from network operators, which transformed the landscape of gas companies.[10] Implementation of the package remains a big priority, as does the creation of new 'trading hubs' where the gas industry and commodity traders can instantly buy and sell gas, rather than depending on long-term guaranteed contracts.

PART 1

# Firepower of the gas industry

A look into the gas industry's lobbying firepower reveals the 'David and Goliath' battle faced by those fighting for a fossil free future. In terms of spending power, number of lobbyists, and number of meetings secured with the two commissioners dealing with energy and climate, it is clearly industry that has all the firepower when compared to public interest groups.

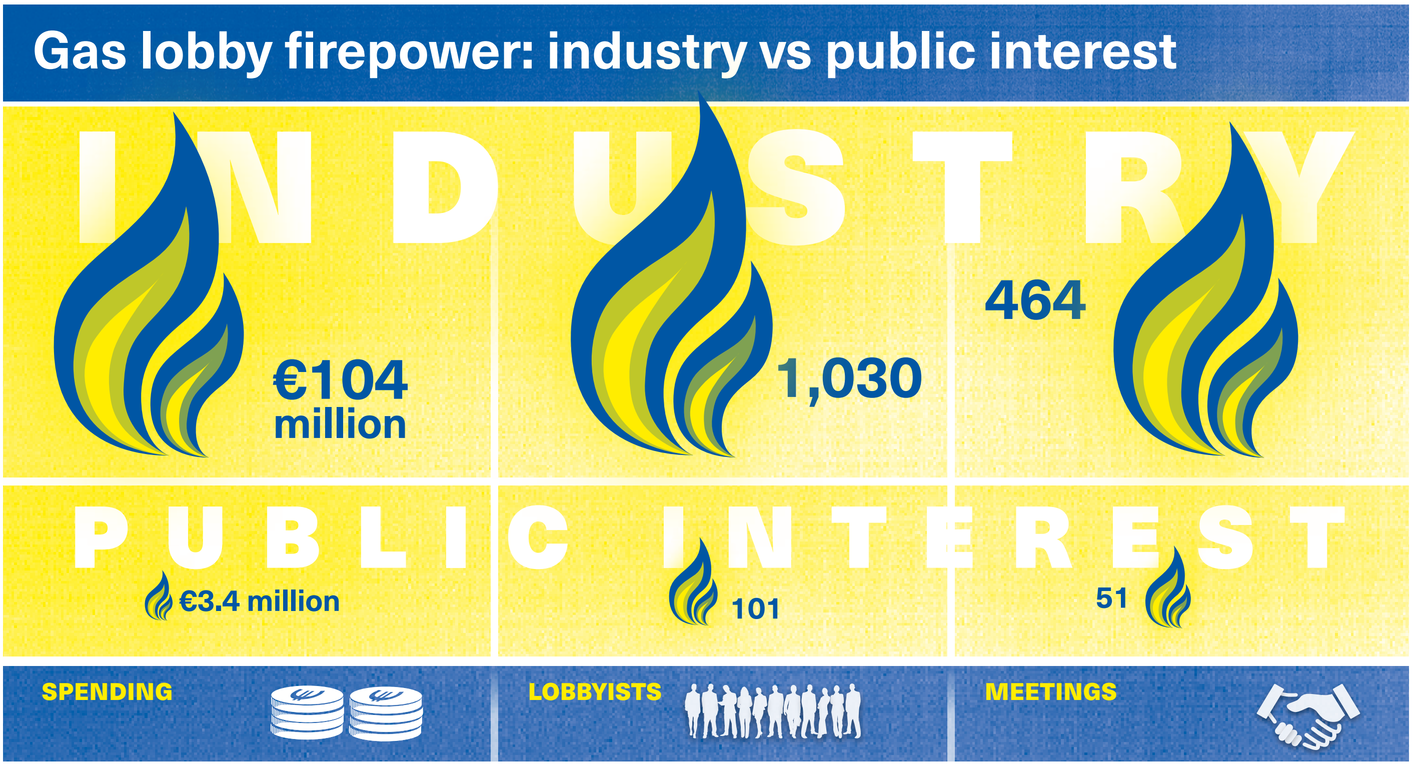
The unsurprising result of this is that current EU energy policy prioritises gas, with the prospect of locking Europe – and all those countries that supply it – into a gas-fuelled future. This will be a disaster for our climate and for communities living along the proposed supply chains.

## Where the gas industry's money goes

Taking the latest figures from the EU's lobbying register,[11] (SEE BOX 3, GETTING TO GRIPS WITH THE DATA) the gas industry – which includes companies involved throughout the supply chain from extraction through to transportation and final use – outspent public interest groups by a factor of 30 on lobbying in Brussels. While environmental NGOs and groups fighting gas spent just over €3.4m on lobbying, industry spent €104m, paying for an army of more than 1,000 in-house lobbyists as well as 79 private contracts with lobby consultancies and law firms (SEE SECTION ON CONSULTANCIES).

Their spending power allows them to follow and influence all the complex twists and turns of the regulatory process, secure lobby meetings with key decision-makers, organise events with the European institutions, sponsor media outlets, cultural institutions and academia, and provide input to the European Commission's high level groups mandated to shape our future energy system.

**Current EU energy policy prioritises gas, with the prospect of locking Europe – and all those countries that supply it – into a gas-fuelled future**




**The gas lobby far out-guns public interest groups in Brussels, spending 30 times as much and with ten times as many lobbyists.**


**Commissioner for Climate Action and Energy, Miguel Arias Cañete, and Vice-President for Energy Union, Maroš Šefčovič, have had an open door policy with industry lobbyists since taking up their posts in November 2014.**

Getting access to key decision-makers is essential for lobbyists. Between November 2014 and August 2017 the gas industry managed to secure more than 460 meetings with the two commissioners in charge of climate and energy policy and their cabinets, Commissioner for Climate Action and Energy, Miguel Arias Cañete, and Vice-President for Energy Union, Maroš Šefčovič.

It's clear that the gas industry barely needed to knock on the commissioners' doors: eight out of ten of their most regular business visitors were from the gas industry. Oil and gas corporation Shell – which recently invested $14 billion in the world's largest offshore floating LNG facility[12] – visited 19 times, and the Trans Adriatic Pipeline (TAP) consortium, involved in the highly controversial Euro-Caspian Mega-Pipeline (ECMP, SEE TAP CASE STUDY), visited 18 times.

It is highly likely (although impossible to confirm) that the gas industry has met frequently with lower Commission staff on numerous occasions. Only high-level meetings are disclosed and the Commission has refused to reveal a list of meetings with all DG Energy and DG Climate staff.[13] These technical level meetings are crucial – every good lobbyist knows that this is where much of the knowledge is held and work is done. This is also one of the reasons why lobby consultancies working for the gas industry are so keen to hire knowledgeable ex-Commission staff (SEE REVOLVING DOORS).

**BOX 3**

## Getting to grips with the data

This report is a first attempt to map the gas industry lobby's spending using the EU Transparency Register, although its limited transparency and voluntary nature has at times hindered analysis. For example, 40 per cent of gas industry companies identified are simply not in the register (SEE BOX 4, OFF THE RADAR). Furthermore, many organisations who lobby on gas were not picked up by our methodology – such as fertiliser company Yara, which sits on the Commission's Gas Coordination Group – as they did not list key words such as 'gas' or 'LNG' in their registry entry (SEE ANNEX: METHODOLOGY).

In addition to running key words through the Transparency Register database the methodology included gathering organisations responding to landmark gas consultations,[14] those proposing to build 'Projects of Common Interest' (PCI), members of ENTSO-G, and those who met the two Climate and Energy Commissioners to discuss gas or who came from the gas industry. The final list was then manually checked to ensure organisations were part of the gas industry.

All identified organisations have had their full, self-declared lobbying budget, total number of individual lobbyists, and total number of meetings with the Climate and Energy Commissioners and their Cabinets combined to give the figures in the report. However, the EU register is only voluntary which means that there are well-known problems with the data, including both under- and over-reporting. Furthermore, a lack of precision in the register makes it impossible to know which resources were dedicated to lobbying on gas or on other topics (such as chemicals, coal, shipping, or electricity markets). This makes an assessment of exactly how much has been spent on lobbying on gas difficult.

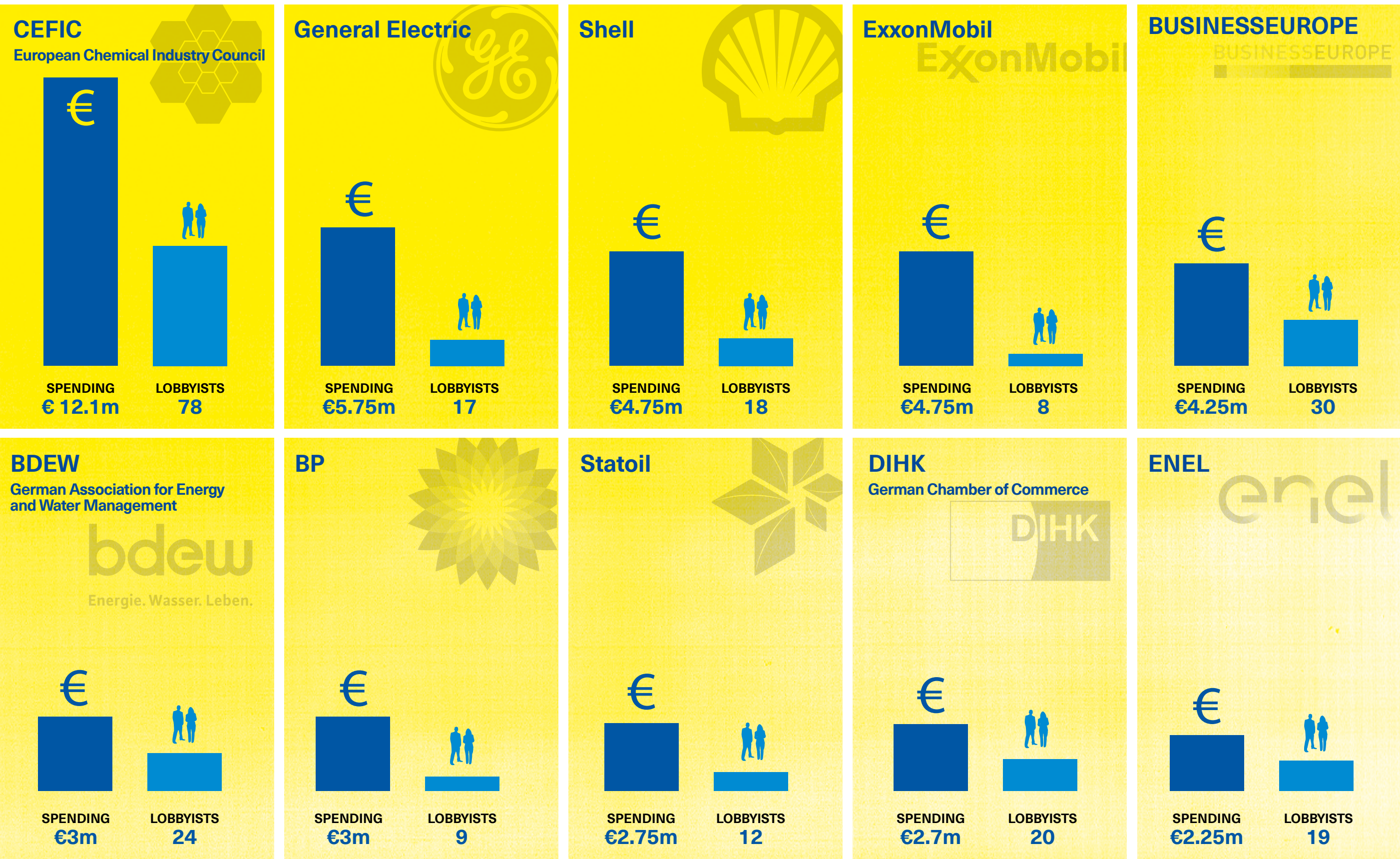
The report has taken the upper-limit of the reported spending figures, eg €200,000 when an organisation reports €100,000-€200,000, but we have also discovered many industry players seriously under-reporting their lobby spending. For example, Cuadrilla declared a total lobby budget of up to €25,000 in the EU's Transparency Register but according to the accounts of FTI Consulting the British fracking company paid them up to €100,000.

As far as meetings with the Commissioners go, while they are disclosed, the subject and the minutes are usually so vague that it is also impossible to say whether gas was discussed or not. Because of this all meetings involving the gas industry have been included.

Therefore the figures reveal the lobbying firepower available to the gas industry, but we cannot claim that it is all directed at influencing gas legislation. Nevertheless, the information uncovered begins to shine a light on the murky world of gas lobbying.

**40 per cent of gas industry companies identified are simply not in the register**

## Gas lobby firepower: Brussels' big spenders




**The top ten gas lobbyists in Brussels account for 45 per cent of overall spending, amassing 235 lobbyists and 95 meetings with the Commissioners in charge of Climate and Energy policy**

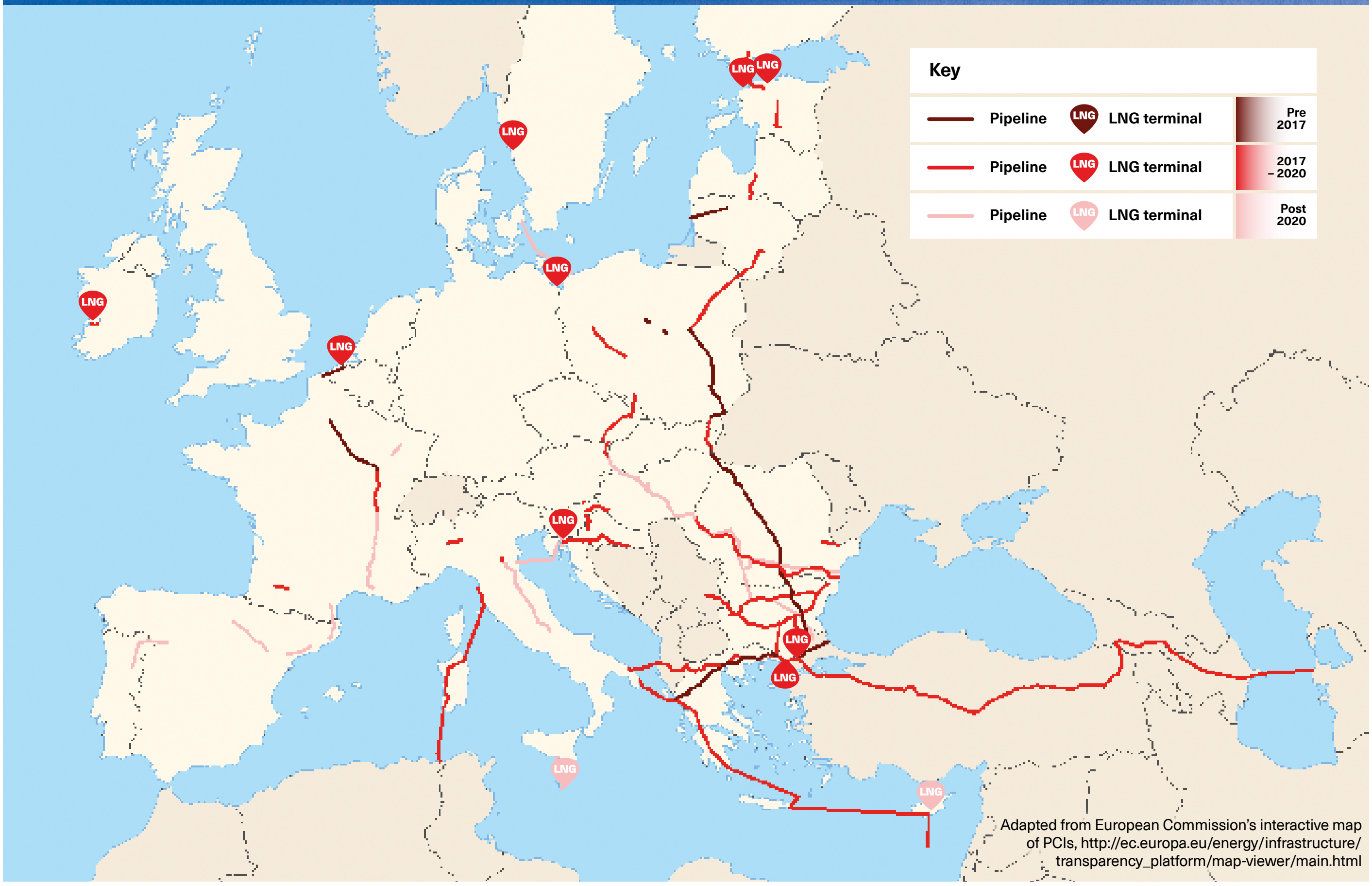
## Bringing out the big guns: top 10 spenders

The biggest gas industry spender is **CEFIC**, the European Chemical Industry Council. With a budget of over €12m and 82 lobbyists, it is one of the most powerful voices in Brussels. CEFIC and its members, including US multinational Dow Chemical, German giant BASF, UK's Ineos, and Belgium's Solvay (all on CEFIC's board),[15] are particularly keen advocates of fracking in Europe[16] and importing fracked gas from the US, including for use as a raw material for manufacturing chemicals and plastics.[17] Opening up the European market to US imports of shale or 'fracked' gas was a key demand of CEFIC during the failed EU-US free trade talks from 2013-2016, the Transatlantic Trade and Investment Partnership (TTIP).[18] **General Electric** has the second biggest wallet, spending €6.5m. The US firm provides services right along the gas supply chain, with a booming oil and gas exploration and production division, and a beefed up gas turbine division since acquiring Alstom's power business in 2015.[19]

Four oil and gas heavyweights made it into the report's 'top 10' lobby spenders with a combined total of €15.25m and 47 lobbyists. This includes **Shell** and **BP**, who have also used their position on the advisory board of prestigious Rotterdam School of Management to shape students' perceptions of the industry.[20] Alongside **Statoil**, which comes in at number 8, they created the progressive-sounding Oil and Gas Climate Initiative in 2015, an effort led by the companies' chief executives just before the key UN climate change summit (COP 21) in Paris. Their aim was to re-brand their gas businesses as low-carbon and to promote them as a solution to climate change.[21] However, **ExxonMobil**, the fourth oil and gas major in the top 10, refused to join the initiative, with top executive Rex Tillerson (now in US President Trump's cabinet) saying he didn't intend to "fake it" on climate change.[22]

The powerful employers' federation **BusinessEurope**, comes in at number five with €4.25m. The federation is a strong advocate for a secure supply and plentiful gas in order to keep the price down for its energy-intensive clients.[23] With 30 lobbyists and an intimate knowledge of the EU's policy process, it enjoys so much access to the European Commission you may ask why it doesn't help with the rent (SEE TRADE ASSOCIATIONS).

# Map of Projects of Common Interest




**Expertly guided by gas industry lobbyists, the European Commission and national governments intend to build a new generation of LNG terminals and gas pipelines**

BOX 4

## Off the radar: not in the register

Four out of ten organisations identified as actively lobbying on gas (SEE BOX 3, GETTING TO GRIPS WITH THE DATA) are not part of the voluntary EU Transparency Register, meaning there is no hard data for the resources they spend on lobbying.

Almost all – over 90 per cent – of the companies proposing projects for the 'Projects of Common Interest' process are unregistered. This includes LNG Croatia LLC, the state-owned consortium behind the Krk LNG terminal, which received €101m through the Connecting Europe Facility.[24] It also includes another Croatian company, Plinacro, which is a member of lobby group the 'European Network Transmission System Operators – Gas' (ENTSO-G, SEE DEDICATED SECTION), and is also involved in the Krk project. In fact, only 11 of ENTSO-G's 52 members and observers are in the register, despite the fact that they are closely involved in gas policy-making decisions via this EU-created lobby group.

In addition, more than 70 per cent of gas industry respondents to the two landmark consultations – relating to gas supply, and LNG and gas storage – (SEE ANNEX: METHODOLOGY) were not in the register either. This is partly because the Commission only "invites" organisations to register "in the interest of transparency" rather than making it mandatory.[25] Also, some organisations that are in the register have stopped updating their entries, including Azerbaijani state-owned oil and gas company SOCAR. However, those companies which were active in 2016 (meetings, consultations etc) have still been included in the report using their most recently declared data.[26]

Without a legally binding and fully enforced transparency register that ensures accurate and detailed declarations of lobby spending and activities, it is impossible to be fully precise about the true firepower of the gas lobby.

# ENTSO-G and the Projects of Common Interest

The **European Network of Transmission System Operators for Gas (ENTSO-G)** is a gas infrastructure lobby group created in 2009 under the Third Energy Package[27] by the European Commission, Parliament, and Council to “promote the completion and functioning of the internal market in natural gas and cross-border trade”.[28] Its role, enshrined within the EU’s ‘Trans-European Networks – Energy’ (TEN-E) regulation, is to propose infrastructure projects as part of its bi-annual plan to develop the EU’s gas network,[29] based on its own projections for future gas demand. Regional groups of governments then agree on projects from the list of ‘Projects of Common Interest’ (PCIs), which are taken on by the Commission. The newest and third such list is expected before the end of 2017.

> **The gas industry is mandated to propose a 10-year infrastructure plan to the EU which it then builds itself**

Importantly, projects included on the PCI list benefit from the fast-tracking of permit granting and impact assessments and are also eligible for various funding streams. The Connecting Europe Facility (CEF) has already paid out more than a billion euros to gas PCIs.[30] Conflicts of interest are inherent in ENTSO-G: the gas industry is mandated to propose a 10-year infrastructure plan to the EU which it then builds itself. ENTSO-G’s 52 members and observers, such as Spain’s Enagás or Belgium’s Fluxys, are responsible for 75 per cent of the PCI projects.

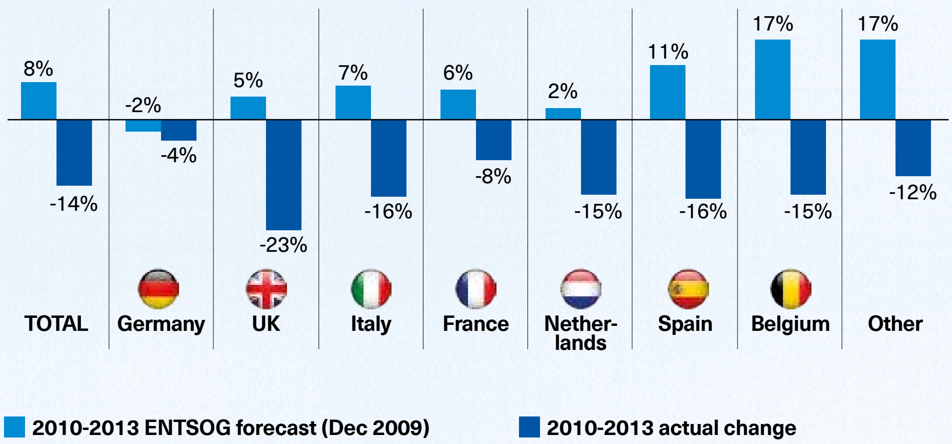
## ENTSO-G as a lobby group

ENTSO-G presents itself as an independent entity with no private interests, but research by Friends of the Earth Europe shows ENTSO-G is clearly driving and influencing the PCI process in the interests of the gas industry.[31] When it comes to conducting cost-benefit analyses of all potential projects, which the European Commission is legally obliged to do,[32] it asks the gas industry lobby group ENTSO-G to carry them out — even though its members stand to benefit from three-quarters of all the projects. ENTSO-G’s lack of impartiality is laid bare by its continually overinflated projections for future gas demand in Europe, leaving the Commission to downwardly revise its projections year-on-year.[33]

As well as constantly claiming gas demand will rocket in the near future, the group has also attempted to rebrand gas, a fossil fuel, as the low-carbon energy of the future, despite the science clearly showing otherwise (SEE BOX 5, THE FABLE OF ‘CLEAN’ GAS). Yet ENTSO-G denies being a lobby group, registering itself as an NGO and claiming it does “not do lobbying activities as such”.[34]

However according to a Parliamentary source, ENTSO-G supplied draft amendments to multiple MEPs on the recent Security of Gas Supply Regulation as it passed through the European Parliament. The industry group was also present during a Shadow Rapporteurs’ meeting, a highly sensitive space where compromises are thrashed out between the political parties. ENTSO-G’s proposal for emergency gas supply routes – extra dedicated pipelines – was eventually proposed by three different political parties and accepted by the European Parliament.[35] Emergency supply corridors were part of the final regulation, meaning even more gas infrastructure and more profits for ENTSO-G members.

In short, ENTSO-G is in reality a gas lobby group with unrivalled influence over the European Commission and the EU’s national governments, and is a key piece of the puzzle explaining why Europe is being locked into decades of unnecessary and costly gas infrastructure.




**ENTSO-G TYNDP gas demand forecast versus actual**

**ENTOS-G has consistently over-estimated gas supply. E3G, ‘Europe’s declining gas demand: trends and facts about gas consumption’, 2015**

BOX 5

## The fable of ‘clean’ gas


The gas industry has rebranded itself as a ‘clean’, climate-friendly fuel, despite the science saying otherwise

The gas lobby’s firepower – the money, lobbyists, meetings, and access – would not have the same impact if the gas industry and their PR advisors had not simultaneously crafted a powerful story as ammunition. Their story is that gas is clean, gas is the natural partner of renewables, and gas offers a transition to a decarbonised world. Therefore we need more gas infrastructure. It’s a powerful and politically attractive narrative, but is it true? The answer is no.

As explained elsewhere (SEE BOX 1, GAS: A BRIDGE TO NOWHERE), gas is far from being a clean, green fuel. Fracked gas is notoriously polluting but in fact conventional gas also potentially has a bigger carbon footprint than oil and even coal. This is because of methane leaks, an extremely potent greenhouse gas.[36]

The science on this is clear. We need to leave at least 80 per cent of fossil fuels in the ground if we are to have any chance of fighting catastrophic climate change, and this includes gas.[37]

Furthermore, gas is not a companion for renewable energy, but a competitor (SEE BOX 6, TAKEOVER OF THE RENEWABLE ENERGY LOBBY). The gas industry argues that the introduction of renewable energies requires the use of gas to maintain ‘baseload power’ (energy that can be supplied consistently around the clock). They argue that renewables are not reliable: the wind doesn’t blow all the time and there’s no sunlight at night. But the idea that big power stations are needed to provide baseload is increasingly outdated, and even energy regulators, such as the head of the UK’s National Grid, accept this now.[38] Thus the gas industry’s story is built on false assumptions.[39]

Investing in big infrastructure risks locking us into using gas for decades

## Gas is not a companion for renewable energy, but a competitor

and slowing down the transition to renewable energy. In particular tighter regulation on climate change and the use of fossil fuels would create a risk of stranded assets, ie infrastructure built now will no longer be usable, let alone profitable, in a decarbonised future, making investments worthless. We can therefore anticipate that the gas industry will marshal all its firepower to try and prevent the introduction of any regulations discouraging the use of gas and devaluing its assets.

With global warming already around 1.1º Celsius above pre-industrial levels in 2016,[40] we do not have time for the delays that would be incurred by such a lock-in. The average lifespan of these projects is usually around 40 to 50 years, and they are therefore designed to last well beyond the year 2050. This is when Europe is supposed to be almost completely decarbonised, under the EU’s current low-carbon economy roadmap. As dozens of civil society groups have reminded the European Commission, if the phase out of fossil fuels does not start now, “the cliff-shape emission reduction necessary to achieve the EU’s 2050 decarbonisation objective will become increasingly difficult”.[41] The future we need and are already planning for is a very different one from that envisaged by the gas industry.

Industry projections of future gas use are too high anyway (SEE ENTSO-G SECTION). According to the EU’s own modelling, Europe already has enough capacity to cover gas demand until 2040 without building new infrastructure.[42] Furthermore, overall demand for gas has fallen by almost 13 per cent since 2010,[43] in part due to renewable energy and energy efficiency policies. We do not need any more new gas infrastructure projects, no matter how many myths the gas lobby spins.

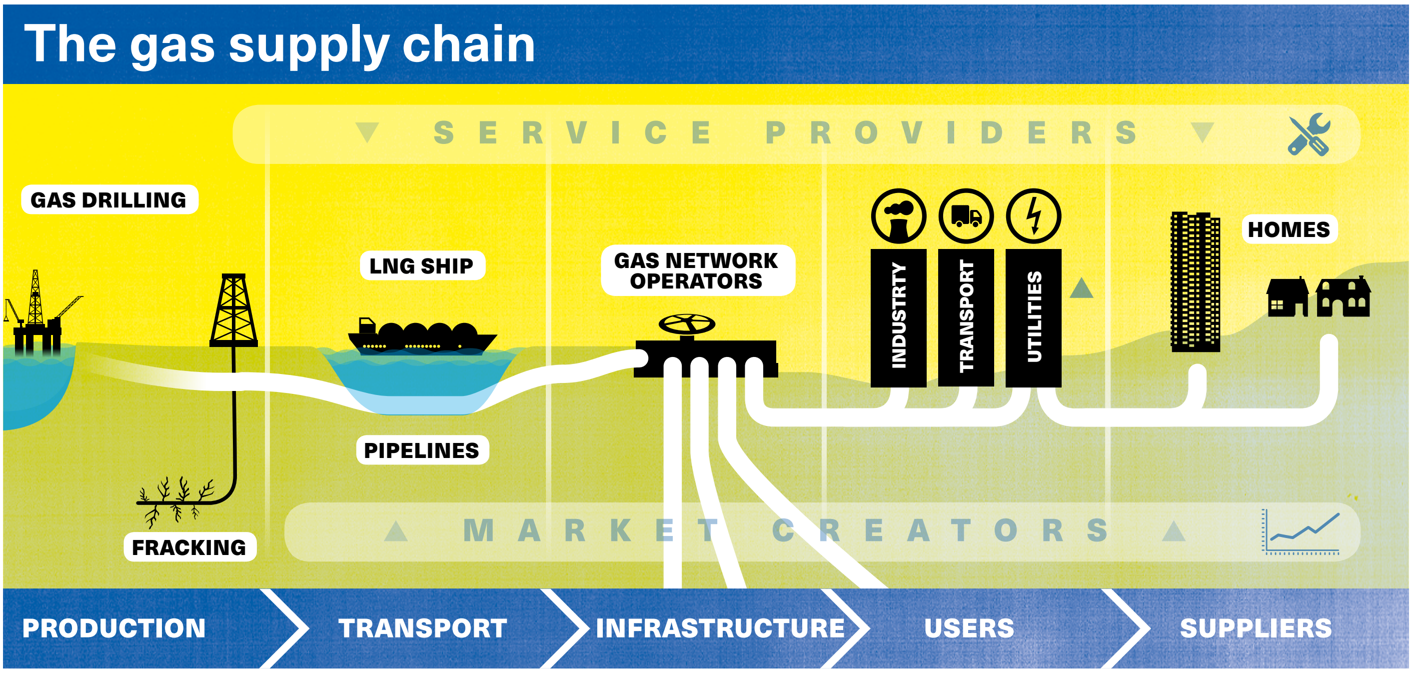

A tweet from Shell’s official Twitter account, part of its ongoing push to reframe gas as ‘low-carbon’


Exxon, who has bet its future on gas, predicts the fuel to provide 25 per cent of all energy by 2040, while renewable energy makes up only 4 per cent

## The gas supply chain

There are Brussels-based gas industry lobbyists focusing on all parts of the gas supply chain (SEE GRAPHIC 4, THE GAS SUPPLY CHAIN), and many companies and trade associations are involved in multiple parts of it. For example French utility Engie, who spent €2.25 in 2016 and has 12 lobbyists, is involved in exploration and production in Algeria, transmission via its affiliate GRTgaz, and LNG transportation and sales. It also owns gas-fired power plants in France and distributes gas to customers.[44]

Nevertheless there are three aspects of the supply chain that are worth paying particular attention to when it comes to lobbying: gas production, building and operating gas infrastructure, and the industrial use of gas.




**Actors along the entire supply chain are actively lobbying in Brussels: corporations involved in production and transportation (via ship or pipeline); large-scale users such as utilities, heavy industry, and a burgeoning transport sector; household suppliers; providers of technology and services; and creators of, and participants in new and existing gas markets**


BP

**BP's drilling platform in the Shah Deniz gas fields, Azerbaijan**

INEOS

**INEOS' 'Dragon Ship', bringing fracked gas from the US to the UK**


GRTgaz / Azmoun Hamid

**A pressure-gauge within GRTgaz's network**

# Producers

| Part of the supply chain | Organisations | Lobbyists | Spending | % of total |
|---|---|---|---|---|
| **Producer** | 39 | 203 | €33.6m | 32% |

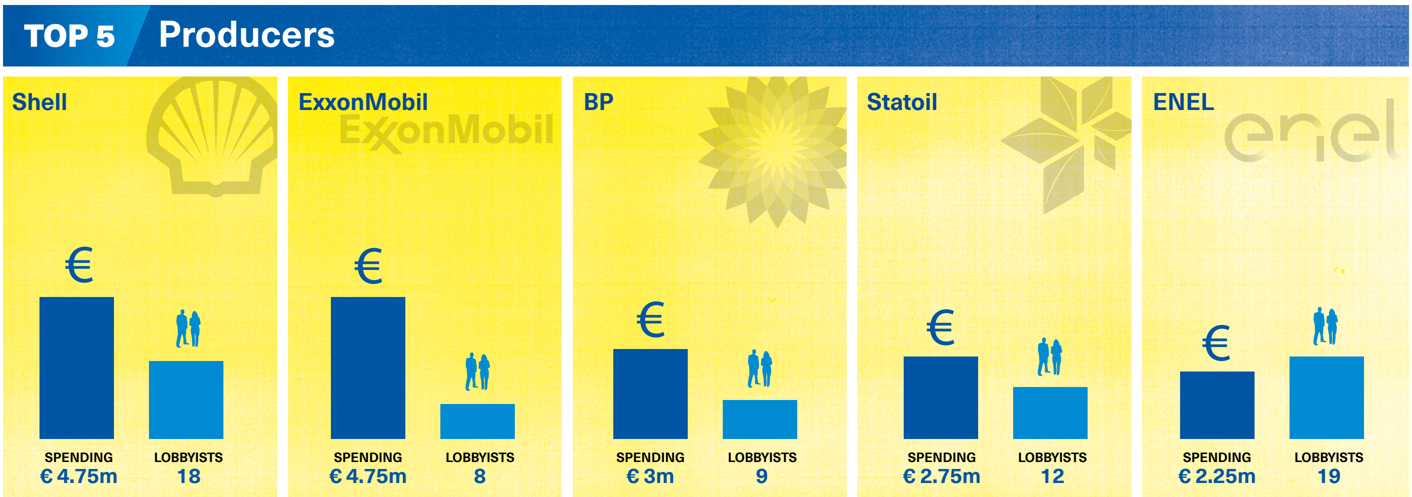
It should come as no surprise that oil and gas majors are among the biggest players in Brussels. Alongside them are many vertically integrated utilities, engaged in many different parts of the gas supply chain, including exploration and extraction (such as Enel, Engie, and RWE).

In total, companies involved in gas production – drilling into the ground for it – spent more than €33m in 2016 on lobbying, with more than 200 lobbyists. The 10 highest-spending producers accounted for just over three-quarters of the total spent. In terms of their impact on climate change the fossil fuels they have dug up have been responsible for 12 per cent of global emissions since the first IPCC report was published in 1988.[45]

**Many oil majors like BP, Shell, Chevron, and Total, have bet their future on gas as a way to stay in business**

Among the top five biggest spenders are four European gas giants. UK-Dutch company **Shell** shares the top spot with US behemoth **Exxon** (spending €4.75m each). Shell may have more in-house lobbyists, but Exxon is still extremely active in Brussels. It sits in the Commission's key gas advisory group (SEE ADVISORY GROUP SECTION), as well as being involved in multiple trade associations and enlisting an army of lobby consultancies to organise parliamentary events and ensure it gets the lobbying access it needs (SEE CONSULTANCIES SECTION).

Many oil majors like BP, Shell, Chevron, and Total, have bet their future on gas as a way to stay in business while being able to claim they are doing their bit to fight climate change. Realising that oil use will decline, especially as climate policy leads to the increasing electrification of transport, they are gambling on rebranding gas as a 'clean' fuel so they can use their technological expertise and financing models honed on oil drilling. They even seem prepared to sacrifice the coal industry, labelling it as 'dirty' and pulling investments if it means gas is accepted as a fuel of the future (SEE LOBBY CONSULTANCIES SECTION).




**The top 5 gas production companies together employ more than 66 lobbyists to influence the EU institutions**

# Infrastructure

| Part of the supply chain | Organisations | Lobbyists | Spending | % of total |
|---|---|---|---|---|
| **Infrastructure** | 42 | 127 | €8.9m | 9% |

Despite the fact that they are often partially or wholly owned by the big oil and gas corporations,[46] those behind the big infrastructure projects – such as the companies building and operating new pipelines (known as Transmission System Operators, or TSOs), LNG terminals or (de)compression stations – maintain a far lower profile than their gas production parent companies. Compared to gas producers, infrastructure builders and operators spent just over a quarter of their budget, and had 60 per cent of the number of lobbyists.

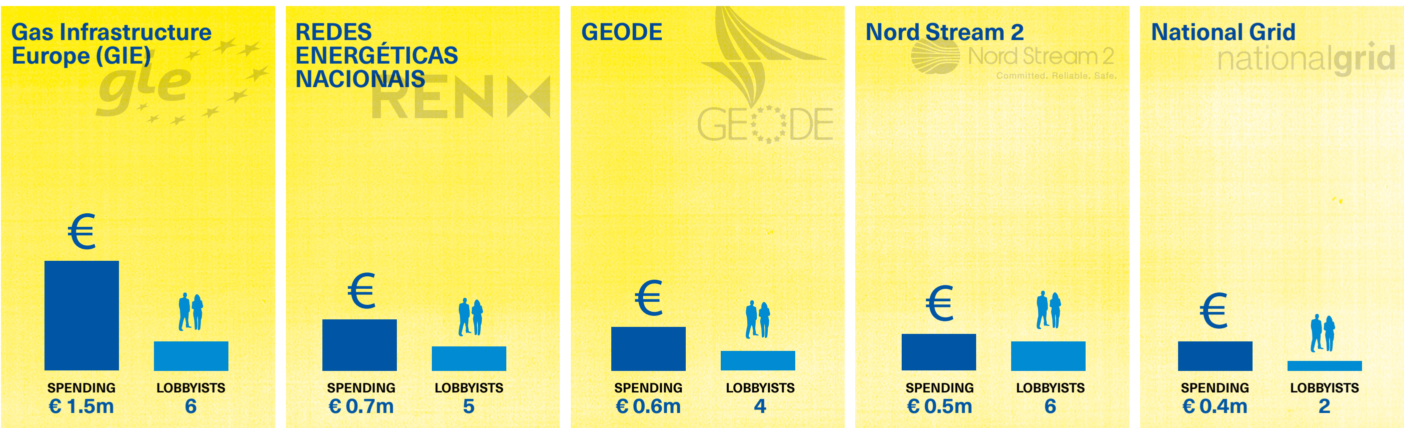
However, this more secretive sector seems to enjoy high levels of access both at national and European level. The industry body/lobby group, the **'European Network Transmission System Operators – Gas'** (SEE ENTSO-G SECTION), ensures that big infrastructure companies are directly involved in identifying which projects need to be built as well as who will build them. Once agreed with the Commission and national governments, they are labelled as 'Projects of Common Interest', benefiting from political fast-tracking and becoming eligible for public funding.

The biggest gas infrastructure spender in Brussels is **Gas Infrastructure Europe** (GIE), a trade association whose €1.5m and six lobbyists ensure it can "actively contribute to the construction of a single, sustainable and competitive gas market in Europe"[47] – which is, coincidentally or not, exactly what the European Commission wants: an EU-wide gas market with lots of trading and competition, which in theory is supposed to bring down gas prices for consumers.[48]

While GIE is officially separate from ENTSO-G, they share an address in Brussels and many members belong to both groups. In addition, the head of GIE's transmissions division (responsible for big gas pipelines) is also President of ENTSO-G, which presumably allows GIE to benefit from ENTSO-G's close relationship with the European Commission and Parliament (SEE ENTSO-G SECTION).

## Big infrastructure companies are directly involved in identifying which projects need to be built as well as who will build them

**TOP 5 Infrastructure builders and operators**




**Despite not spending big, lobbyists for infrastructure builders and operators are instrumental in shaping EU gas policy, and enjoy high levels of access**

## Users

| Part of the supply chain | Organisations | Lobbyists | Spending | % of total |
|---|---|---|---|---|
| **User** | 56 | 414 | € 39.5m | 38% |
| **Utilities** | 43 | 274 | € 23.6m | 23% |
| **Industrial users** | 9 | 131 | € 15.6m | 15% |
| **Transport** | 4 | 9 | € 310,000 | 0.3% |

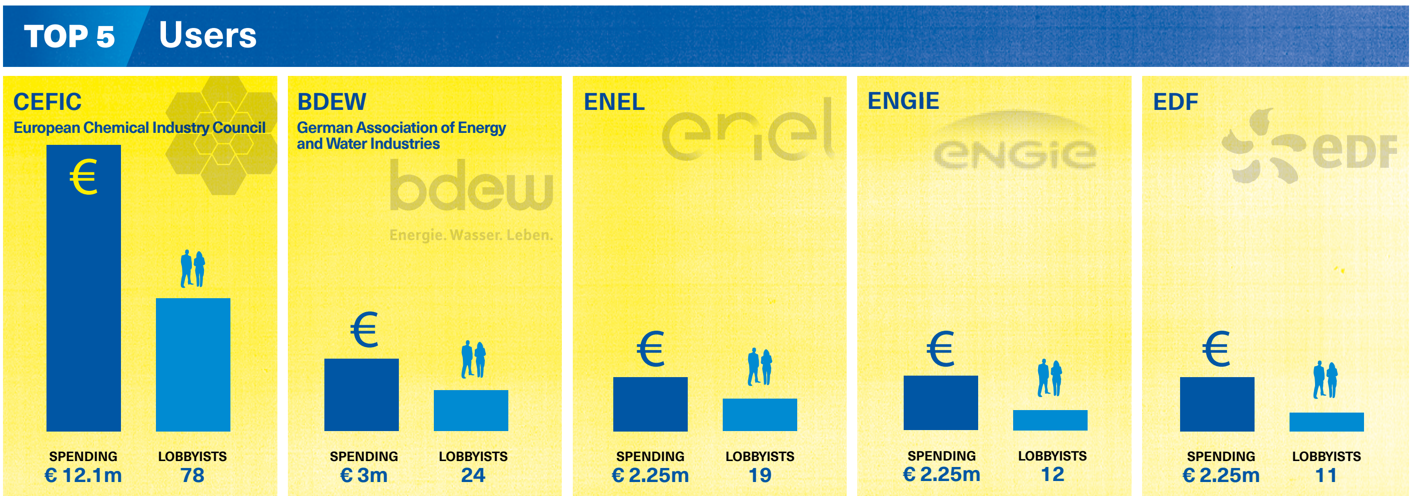
These are the highest spending actors in the supply chain, even more so than gas producing companies. They are the consumers of gas, those whose businesses depend on its steady supply. Together they spent almost €40m in 2016.

There are three main groups. Firstly **utilities**, who use gas to make electricity. Secondly **industrial users**, who use gas to create other products such as chemicals, or energy-intensive sectors like the ceramics industry. And thirdly the growing **transport sector**, particularly the use of LNG in ships. The top five is unsurprisingly dominated by utilities, which heavily outnumber other users in our results (SEE TABLE).

**Utilities:** the biggest player is the **German Association of Energy and Water Industries (BDEW)**, a trade association representing more than 1,900 utilities across Germany, including RWE, and the German branches of EDF and Engie. It accounts for 90 per cent of natural gas sales in the country. **Enel** (Italy) is present in Brussels not just through its own office but also as President of trade associations **Eurelectric** (utilities) and, more controversially, WindEurope, as well as taking the Vice-President's slot at Solar Power Europe. This might explain why both these renewable associations have given their official support to gas as a 'clean fuel' (SEE BOX 6, TAKEOVER OF THE RENEWABLE ENERGY LOBBY). **Engie** (formerly GDF-Suez) has undergone a similar transformation in the past two years, repainting itself green and claiming "gas is now central to the energy revolution we are living through".[49]

**Industrial users:** Chemicals trade association **CEFIC** is by far the biggest lobby spender (SEE TOP SPENDERS), but the synthetic fertiliser industry is also a big user of gas as it is a key ingredient in the production of fertilisers. The fertiliser industry has been a major consumer of cheap fracked gas in the US,[50] and its European counterparts are seeking similar production in the EU.[51]

**Transport:** Some industry players are trying to position gas in its liquified form (LNG) as a transport fuel, although none make the top five. The **Natural Gas Vehicle Association** (NGVA) Europe, spent €25,000 on lobbying, advocating for LNG on behalf of members such as Volkswagen but also gas corporations like ENGIE and Fluxys. These two are also putting their money into LNG as a marine fuel, marketing it as an "environmentally friendly and cost-effective solution".[52] They have embarked on a new joint venture to supply ships from Fluxys' Zeebrugge LNG terminal (a PCI project).




**Industrial-scale gas users spend even more on lobbying in Brussels than gas producers - although some companies are involved in both**

## Gas on tap: Trans Adriatic Pipeline – a case study

The Trans-Adriatic Pipeline (TAP) is the last leg of the Euro-Caspian Mega-Pipeline (ECMP), bringing Azeri gas from the Turkish-Greek border to Italy via Albania. It is supposed to cost €4.5 billion, a tenth of the overall projected ECMP price tag.[53] TAP shareholders include **SOCAR** (Azerbaijan, 20 per cent), **BP** (UK, 20 per cent), **Snam** (Italy, 20 per cent), **Fluxys** (Belgium, 19 per cent), **Enagás** (Spain, 16 per cent), and **Axpo** (Switzerland, 5 per cent).

German utility E.On, who was involved from the beginning, pulled out in 2014, as did Total and Statoil. The latter two also pulled out of the Turkish leg of the pipeline, TANAP, and sold their shares in the Azeri Shah Deniz project.[54] The Shah Deniz gas fields, in which BP and SOCAR are major shareholders, are supposed to supply the ECMP. TAP is predicted to carry 10 billion cubic metres (bcm) of gas per year by 2020, with the potential of increasing production to 20 bcm.[55] The EU's current gas usage is around 450 bcm per year.[56]

The ECMP (officially known as the 'Southern Gas Corridor') is the EU and Vice-President Šefčovič's flagship Project of Common Interest (PCI), and is supposed to decrease Europe's dependency on Russian gas. For the repressive Azerbaijan authorities, it could cement their relationship with Europe and keep President Ilham Aliyev and his close circle in power. To overcome resistance on the ground as well as cover up flagrant human rights abuses, TAP and those behind it have employed a complex web of lobbying and bribery. But as public and private banks ponder whether to finance the project, will it be enough to silence opposition?

The laying of the pipeline is currently delayed in both Greece and Italy. Local farmer Themis Kalpakidis from the town of Filippi, Northern Greece, is against a pipeline through fertile agricultural lands, as well as close to homes in areas known for seismic activity. Kalpakidis reflects local anger when he says, "If the company wants the pipeline to pass through our region, it will first have to pass over our bodies."[57] Local communities in Melendugno, Southern Italy, have been fighting construction since 2016, both via the courts and through physically blocking machinery. They've faced increasing violence from a militarised police, but the movement keeps growing, united against all gas pipelines under the banner 'Né Qui, Né Altrove' — 'not here, not anywhere'.[58]

> **To overcome resistance on the ground and cover up flagrant human rights abuses, TAP and those behind it have employed a complex web of lobbying and bribery.**

### Caviar diplomacy: whitewashing repression, currying political favour

Azerbaijan is notorious for human rights abuses and repressing opposition — and also for whitewashing its international reputation through 'caviar diplomacy', bringing European officials to Baku and showering them with gifts, including silk carpets, gold, silver, and kilos of caviar.[59] In 2013 with key decisions over the pipeline looming, intense Azeri lobbying successfully voted down a report into their political prisoners by the Parliamentary Assembly of the Council of Europe (PACE), a report which could have caused reputational damage and scuppered the deal.[60] Later that year, after TAP had been officially selected to bring Azeri gas to Italy, Italian **MEP Pino Arlacchi** returned from Azerbaijan as head of a European Parliament delegation, and – defying all independent observers on the ground – declared the elections "free and transparent". When later grilled by Parliamentary colleagues about the glaring discrepancy, he claimed he was trying to "defend" Italian interests in the region.[61]

In what became known as the Azerbaijani Laundromat scandal, between 2012-2014 the Azeri regime channelled billions of dollars through offshore companies in order to launder money and pay for bribes.[62] Azeri and European figures influential in TAP and the ECMP were implicated – including **Kalin Mitrev**, a board member of the European Bank of Reconstruction and Development (EBRD), which is considering financing TAP.[63] Ilgar Mammadov, arrested by the Azerbaijani authorities in 2013 on bogus charges, published a 'Letter from an inmate of the Southern Gas Corridor' while in jail: "International investment in fossil fuel extraction is making me and other Azerbaijani political prisoners hostages to the Aliyev regime," he wrote, calling for a halt to financial support.[64]

### The European Azerbaijan Society (TEAS)

TEAS is an Azeri lobby group with offices around Europe. It declares five lobbyists and spending of up to €100,000, and secured five meetings with the Commission's top officials in 2015 (a key year for deciding the last PCI list, as well as funding decisions from multilateral development banks).

Headed up by Tale Heydarov, son of an Azeri minister from Aliyev's inner circle, it organises high-level events including in the European Parliament.[65] The events often focus on energy cooperation, particularly the TAP and Euro-Caspian Mega-Pipeline, and the cast is often the same: an Azerbaijani ambassador joined by senior management from BP, SOCAR, or other TAP shareholders, and sometimes by the Baku office of their reliable law firm **Dentons**, which is also closely involved.[66] Many of TEAS' events are co-organised with think tanks, other lobby groups, universities or the European Commission, in order to build Azerbaijan's credibility.[67] Speaking at the opening of the new TEAS Benelux office in 2016, **Belgian deputy Prime Minister and Minister for Foreign Affairs, Didier Reynders**, said "The role of TEAS in bringing Azerbaijan closer to Belgium and the rest of Europe cannot be underestimated".[68]

### TEAS and Fluxys

TEAS and Azerbaijan have a particularly special relationship with Belgian political and economic elites. Many Belgian companies and politicians were caught up in the Laundromat scandal,[69] including ex-Belgian Minister Marc Verwilghen who headed the TEAS Benelux office until he resigned in September 2017 over the scandal.[70]

At the heart of the Azeri-Belgian relationship is TAP, in which Belgian gas infrastructure company Fluxys is a 19 per cent shareholder – one of its many investments supported by the PCI process.[71] Fluxys, which is majority-publicly owned and has "climate-friendly" **Gent Mayor Daniël Termont** as director,[72] co-organised a conference with TEAS at a swanky chateau with "more than 120 diplomats, ministers, Belgian politicians and businesspeople" to focus on "the pivotal role of Azerbaijan in the Southern Gas Corridor".[73] Gas companies and governments sat side by side: SOCAR with Azerbaijan's Energy Minister, Fluxys' then-CEO, now TAP President, with Belgian deputy Prime Minister Reynders. The opening speech from TEAS' then-Director was aimed squarely at them: "The Southern Gas Corridor should be steered at the highest political level in Europe and Belgium, in addition to Azerbaijan."[74]

**"If the company wants the pipeline to pass through our region, it will first have to pass over our bodies."**

**Themis Kalpakidis,
local farmer from Filippi, Greece**

### Highest political level in Europe

Vice-President **Šefčovič** has been equally keen to ensure TAP and the ECMP are steered at the highest political level in Europe. Immediately after taking office in November 2014 he flew to Baku to meet President **Aliyev** and establish the **Southern Gas Corridor Advisory Council**. The Council's February 2017 meeting in the Azerbaijani capital brought energy ministers from along the pipeline corridor together with high-level delegates from the US and UK, as well as World Bank representatives. Despite Azerbaijan's flagrant human rights abuses, Šefčovič's opening speech piled praise not just on the pipeline's "remarkable progress" but on Aliyev himself for re-starting negotiations on a new wide-ranging relationship with the EU with energy security "at the centre".[75]

Šefčovič's friendly approach to the pipeline is reflected in his and his cabinet's 31 meetings with BP, SOCAR, Snam, and the TAP AG between January 2015 and August 2017. Three of his four most frequent visitors have been TAP AG and its shareholders, but when civil society tried to engage the Vice President on TAP and TANAP, the request for a meeting was refused.[76]

And in the ultimate irony, despite the EU's efforts to reduce fuel dependency on Russia, Gazprom is likely to transport Russian gas through the Trans Adriatic Pipeline via the planned Turkish Stream.[77]

**"International investment in fossil fuel extraction is making me and other Azerbaijani political prisoners hostages to the Aliyev regime."**

**Ilgar Mammadov,
'Letter from an inmate of the Southern Gas Corridor'**

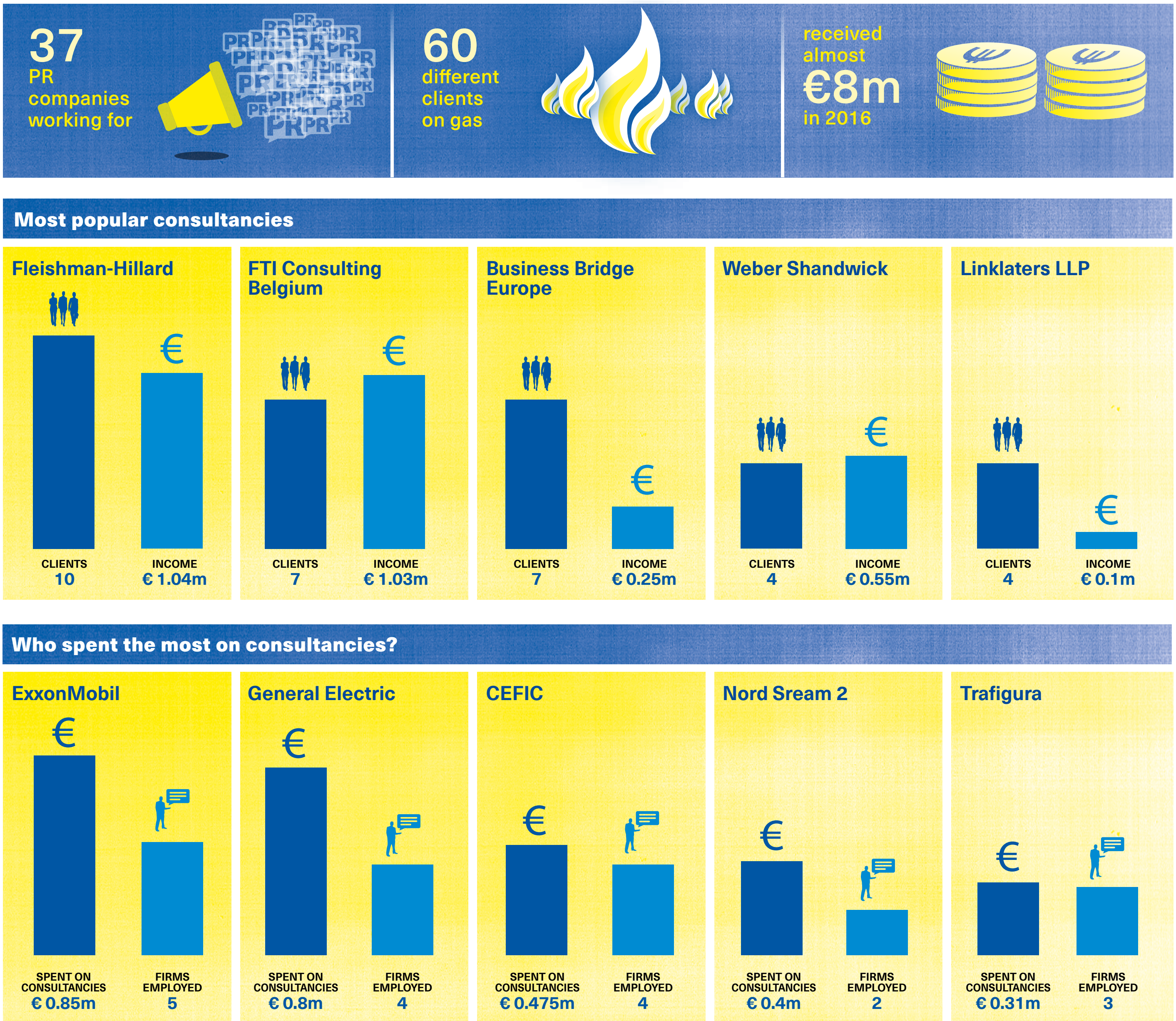
## PART 2

# Channels of influence

The gas lobby uses diverse channels to get EU institutions and the public to buy into their narrative that gas is a clean and necessary transition energy, and that we need more gas infrastructure. Their tactics include hiring ex-officials who pass through the revolving doors from EU and national government institutions, joining expert groups to advise the Commission at an early stage of decision-making, and hiring PR firms.

## PR companies lobbying for the gas industry

Consultancies – also know as PR companies – are an essential part of the lobbying landscape and play an invaluable role for the gas industry in shaping its message and making sure it's heard by the right people.[78] A total of 37 consultancies together earned as much as €7.9m from lobbying on behalf of 60 different gas industry players.[79]




**Lobby consultancies play an invaluable role in getting gas industry messages heard by political decision makers**

The most profligate industry player is **Exxon**, both in terms of spending and the number of different lobbying consultancies employed, spending €850,000 from its overall €4.75m lobbying budget on five different firms. Among the five were Brussels giants Fleishman-Hillard and FTI Consulting, who each made more than a million euros last year lobbying for gas industry clients.

**FTI Consulting**, which has a history of working with Exxon on fracking,[80] currently earns €200,000 from the US oil and gas major. In exchange, it ensures Exxon's views are heard by decision-makers, including organising an after work drinks at a fancy wine bar aimed at MEP assistants where it presented its new predictions for future energy use.[81] This is an important lobbying tactic as assistants are often responsible for writing speeches, parliamentary questions and providing background briefings for their MEPs.

Exxon has also contracted **Fleishman-Hillard**, one of the world's biggest PR companies and a heavyweight in Brussels' dirty energy lobby scene, with 10 gas clients alone on its books.[82] Alongside Exxon are **BP** and Italian infrastructure-builder and operator **Snam**, both involved in the controversial Trans Adriatic Pipeline (SEE TAP CASE STUDY).

Fleishman also earns up to €200,000 from the 'trade association of trade associations' **GasNaturally** (SEE TRADE ASSOCIATION SECTION), helping it to paint gas as the reliable partner to renewables (SEE BOX 5, THE FABLE OF 'CLEAN' GAS). In 2016, GasNaturally got Solar Power Europe, WindEurope, and others to sign a joint declaration on electricity market design[83] – how to ready the grid for more renewable energy – spinning gas as having "a major role to play... as a lower-carbon fuel", providing "the flexibility needed to integrate renewable[s]".[84]

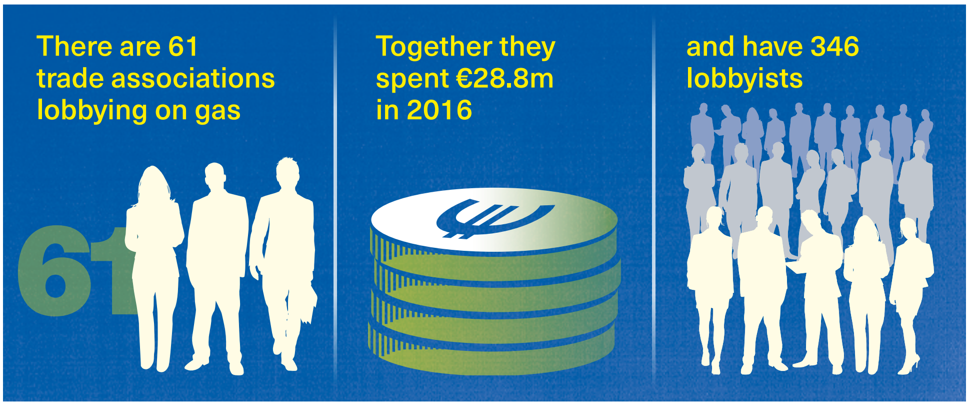
Actively engaging with the renewable energy industry has become a key strategy to boost credibility, although some gas players with small wind or solar investments have gone a step further, taking over the renewables lobby to make sure it supports gas (SEE BOX 6, TAKEOVER OF THE RENEWABLE ENERGY LOBBY). As well as associating with renewables to help GasNaturally, Fleishman also used the tactic in their 2012-2013 FREE (Future of Rural Energy in Europe) campaign, which brought the gas and renewables industries together behind a claim that a 40:60 gas-to-renewables energy mix was the best combo in the countryside.[85]

In fact, **Weber Shandwick** began painting gas as a partner fuel back in 2011 when they first set up GasNaturally, not as the super-trade association it would become, but as a campaign. The PR firm launched the campaign on behalf of the trade association coalition to ensure gas was not dropped when the EU was planning its 2050 decarbonisation strategy.[86] François-Régis Mouton, Gas Naturally President at the launch of the scheme said, "gas and renewables go hand in hand to achieve secure supplies with lower emissions."[87]

Weber Shandwick are still using the tactic, recently launching the 'Make Power Clean' campaign in September 2017, a common front of renewable energy associations and the gas industry in a fight against subsidies for inefficient coal plants.[88] Once again the gas industry is able to portray its business as 'clean' by contrasting it with coal at the same time as cosying up to the renewables lobby – despite the dirty truth that emissions from gas are as bad if not worse for the climate (SEE BOX 1, GAS: A BRIDGE TO NOWHERE).

Finally, it would be remiss not to mention Europe's biggest gas supplier, the Russian company **Gazprom**, and its PR firm, **GPlus**. The firm is notorious in Brussels for two things:


**Since its launch in 2011 super-trade association GasNaturally has been trying to paint gas as a partner to renewable energy.**




hiring ex-EU officials and being the mouthpiece of Gazprom (from whom it 'officially' earns up to €200,000 a year)[89] and the Kremlin.[90] According to its website, Deputy Chairman Tim Price is Senior Communications Advisor to Gazprom Export (the trading branch of Gazprom), but since 2006 has also been a senior media adviser to the Press Service of Vladimir Putin.[91] Much of the EU's current energy policy is designed to reduce dependence on Russian gas (though not on gas itself), and avoid instances such as April 2014 when Russian President Vladimir Putin sent a letter to European governments threatening to cut off Gazprom's gas supplies to the Ukraine. The letter was then circulated among journalists by GPlus.[92] Ironically, the EU's attempts to diversify its sources through more infrastructure and market liberalisation have seen Gazprom exports actually increase to Europe, if at a lower price,[93] including through the EU's flagship pipeline, the Euro-Caspian Mega-Pipeline (SEE TAP CASE STUDY).

## The loudest choir: industry lobby groups

Out of the entities covered in this report, 61 are gas-related trade associations which coordinate the lobbying activities of their members, who are usually major companies or national gas federations.

Trade associations lobbying on gas have an army of lobbyists (346) based in Brussels, and exert influence at every stage of policy-making, from participating in expert groups to flooding the Commission and Parliament with hundreds of position papers, to following up on the fine details of implementation. They represent all parts of the gas chain, from producers such as the International Association of Oil & Gas Producers (IOGP) to users such as Fertilizers Europe. Together they had more than 90 meetings with Commissioner Cañete and Vice-President Šefčovič between November 2014 and August 2017.

The biggest spender is chemicals association **CEFIC** (SEE TOP SPENDERS SECTION) but one of the most powerful gas lobby associations is **GasNaturally**. It is made up of six different trade associations spanning the supply chain (SEE TABLE) and while only spending €350,000 itself, if combined with its members the figure reaches ten times that (€3.5m). Collectively they can call on 29 lobbyists.

GasNaturally's President is Marco Alverà, current CEO of Italian TSO Snam with a long history in oil and gas producer Eni. Snam is involved in both MidCat (via its 40.5 per cent stake in TIGF) and the Trans Adriatic Pipeline (SEE CASE STUDIES). The super-trade association's lobbying activities include meetings with high-level officials in Brussels, open letters to heads of state before big European Council meetings,[94] and numerous events with MEPs in both the European Parliaments. Its marquee activity is the yearly 'Gas Week', a week-long programme of public debates aimed at European policy makers which in 2016 took place in the European Parliament in Strasbourg.[95] Adina-Ioana Valean, centre-right Romanian MEP and Chair of the Environment Committee regularly hosts their Strasbourg events.[96]

| GASNATURALLY MEMBER | ROLE IN THE SUPPLY CHAIN |
|---|---|
| **International Oil and Gas Producers Association (IOGP)** | Exploration and production |
| **Gas Infrastructure Europe (GIE)** | Transmission, storage and LNG regasification |
| **Eurogas** | Retail and distribution |
| **Natural Gas Vehicles Association (NGVA) Europe** | Gas in transport |
| **Marcogaz** | Technical legislation and standardisation |
| **European Gas Research Group (GERG)** | Research and development |
| **[Observer: International Gas Union (IGU)]** | Complete supply chain |

It is also worth mentioning **BusinessEurope**, the employers' federation, due to its sheer influence and privileged access to top decision-makers. The Brussels-based lobby group has a long history of pushing for cheap gas, particularly fracking,[97] with many of its corporate members representing the gas industry, including BP, Engie, Exxon, Repsol, and Solvay. Every year BusinessEurope holds a day-long event in the Commission's headquarters where the CEOs of its main companies spend the day discussing their agenda with a select group of Commissioners. The topic in 2013 was the EU's 2030 climate and energy targets, just as they were being finalised. BusinessEurope successfully pushed to weaken the renewables and energy efficiency targets which threatened to transition Europe away from fossil fuels.[98]

**BusinessEurope successfully pushed to weaken the renewables and energy efficiency targets which threatened to transition Europe away from fossil fuels.**

**CEOs from BusinessEurope's corporate members spend the day with the Commission's elite in 2013**



## Advisory and High Level Groups

One of the key ways industry influences European decision-making is through participation in European Commission advisory groups. In the case of gas, there are not only advisory groups (formally known as 'Expert Groups'), but also regional High Level Groups which monitor progress of Projects of Common Interest (PCIs), and fora such as the Madrid Forum. These groups to varying degrees provide (industry) 'expertise' to make up for the Commission's lack; co-ordination across member states; and the building of political support – both in governments and among industry. As such they can have a great deal of influence over gas strategy, particularly at early stages of development.

**BOX 6**

## Takeover of the renewable energy lobby

The gas industry benefits vastly from being seen as a companion fuel with renewable energy. Some gas players have even infiltrated the renewables lobbies to make them pro-gas. In January 2015 *The Guardian*'s Arthur Neslen revealed that gas companies like Total, E.On, Iberdrola, and Enel used their investments in renewables to join the solar and wind lobbies and take over their boards. According to staff at the European Photovoltaic Industry Association (now called **Solar Power Europe**), the orders "to argue for a renewable-gas alliance as the answer to Europe's energy security concerns" came from its then-President, Oliver Schaefer, who was also the Marketing Director at one of fossil fuel giant Total's solar subsidiaries.[99] Incidentally, the current CEO of Solar Power Europe, James Watson, was a former Director at Weber Shandwick, the same PR firm behind the gas-renewables partnerships of GasNaturally and #MakePowerClean (SEE CONSULTANCIES). The European Wind Energy Association (now called **WindEurope**) equally suffered from infiltration, duly lowering its 2030 renewable energy target from 45 per cent to 30 per cent. The incredible extent of the renewables lobby takeover can be seen in the way that board members Iberdrola, Enel, and other utilities argued against any form of renewables target and instead pushed for support of gas.[100]

## Advisory groups

The **Gas Coordination Group** advises the Commission on issues of security of supply, officially in the case of an emergency but in reality on all security of supply issues.[101]

This powerful advisory group enjoys privileged access to upcoming infrastructure plans, LNG and storage strategies, and other proposals from the Commission, often getting a first input into regulations others haven't seen. This is a serious problem – and an obvious conflict of interest – when in addition to members from the 28 EU governments, there are 24 seats for 8 industry trade associations representing all parts of the gas supply chain (including IOGP, GIE, and Eurogas, all members of GasNaturally – SEE SECTION ON TRADE ASSOCIATIONS).[102] Civil society groups are excluded from the Gas Coordination Group, meaning the only stakeholder voice is industry's, the same voice with a financial interest in increased gas supply.

In many cases the trade associations allow their members to take one of their seats, allowing companies such as such as Exxon and Fluxys direct access to decision-makers.[103] In short, the Commission is inviting the gas industry to sit around the table and help craft policy. The EU-created industry lobby group ENTSO-G (SEE DEDICATED SECTION) also has a prominent role in the advisory group, providing projections and technical data.

Other advisory groups which offer the gas industry privileged access include the **Sustainable Transport Forum**, (also known as the Expert Group on Alternative Transport Fuels), where a number of trade associations – including EURELECTRIC, GIE, and the Natural Gas Vehicle Association (NGVA) Europe – are involved in having LNG taken up as a transport fuel.

**The Commission is inviting the gas industry to sit around the table and help craft policy**

As rules have tightened around advisory groups thanks to pressure from the European Parliament, the European Ombudsman, and campaign groups,[104] the European Commission has looked for other ways to secure industry input. In 2015 it created an advisory group disguised as a 'network', the **Unconventional Hydrocarbons Network**, to identify best-practice for the widely-opposed technique of fracking (SEE BOX 1, GAS: A BRIDGE TO NOWHERE).[105] Packed with fracking industry employees and sympathisers, the group – officially called a 'network' and therefore outside of advisory group rules – was eventually shut down after a public backlash. Despite this, the Commission continues to help the fracking industry, for example organising a June 2017 transatlantic conference to learn from US experiences in overcoming opposition to fracking.[106] One presenter at the conference proposed, "Gain trust and socio-political legitimacy" by creating "the perception that the company contributes to the well-being of the region".[107]

Liquid Freeze, Torbein Rønning / Flickr

**More and more LNG tankers will be arriving in Europe's ports thanks to the EU's drive for new gas infrastructure**

## High level groups

At the EU level there are currently three High Level Groups on gas, covering central and south-eastern Europe, south-west Europe and the Baltic states. Coordinated by the Commission, they bring together national governments, regulators, and the gas industry.  They discuss issues "of high priority" and monitor the regional PCI process, providing the political and technical backing Vice-President Šefčovič requires to turn his Energy Union dream of a fully integrated European gas market into a reality.

The **Central and South Eastern Europe Gas Connectivity (CESEC)** High Level Group (HLG) was set up in January 2015, immediately after Šefčovič became vice-President for the Energy Union, to speed up progress on infrastructure and market creation.[108] In geo-political terms the group's goal was to avoid reliance on Russian gas supplied via Ukraine. CESEC decisions and priorities have a big impact on the design of the PCI list (SEE ENTSO-G SECTION).

Gas infrastructure companies are invited to participate, but to date, civil society has not been included in the process. International financial institutions and partner countries can also attend, specifically Azerbaijan, whose gas supply underpins many of the region's infrastructure projects (SEE TAP CASE STUDY).

As well as infrastructure, a keen focus of CESEC's technical working groups is the creation and integration of gas markets. Putting the trading infrastructure in place to create a multitude of physical and virtual 'gas hubs' (ie stock exchanges for the gas market), not to mention the additional physical infrastructure to allow gas to flow freely around Europe, will lock the continent even further into a future with gas.

The **High Level Group for South-West Europe** has also been important in providing political support for regional infrastructure projects, particularly the MidCat pipeline (SEE CASE STUDY). Equally, the **High Level Group on the Baltic Energy Market Interconnection Plan (BEMIP)**, set up in 2009 under the Third Energy Package (SEE BOX 2, THE EU, A WILLING PARTNER) but renewed in 2015, has been particularly important in catalysing regional LNG infrastructure, as well as the push for market integration.[109]

## Fora

The Commission has also created a number of 'fora' to discuss energy policy. The **Madrid Forum** is co-hosted by the Commission and the Spanish regulator "to discuss issues regarding the creation of the internal gas market".[110] This forum is not reported upon in the press, despite the fact that the Commission is joined by national governments, regulators, and all parts of industry, including gas suppliers, traders, industrial consumers, and gas exchanges. But no members of civil society.[111] In 2015, 32 out of 49 industry participants came from the same 8 industry lobby groups that sit in the Gas Coordination Group.[112]

The conclusions of the 2016 Madrid Forum unsurprisingly reflected the shared Commission-industry agenda, stressing "the potential of LNG and storage" for "diversification and security of supply", while congratulating the progress in building gas markets in southern and central Europe. There was also a demand to involve industry in designing how to reduce gas trading companies' "administrative burden".[113] Letting industry (re)write the rules is a long-standing and relatively successful industry demand in Brussels.[114]

## Case study: MidCat – catapulting Spain to centre stage for gas

The MidCat project is a controversial gas pipeline proposed to run across the Pyrenees from Catalonia in northern Spain to just outside Carcassonne in South-eastern France. Begun in 2011, its main goal is to double the current capacity of transportation of gas from Spain to France in order to increase the European Union's 'energy security'.[115] Despite opposition by local affected communities work is planned to resume in 2019.

Behind MidCat are two French companies, TIGF (Transport et Infrastructures Gaz France) and GRTgaz, and the Spanish company Enagás.

Spain was shielded from the EU's gas crisis as an existing pipeline brings its gas from Algeria, and it imports LNG gas from countries such as Norway, Qatar, and Nigeria. Indeed Spain's seven LNG re-gasification plants are part of its massive overcapacity in gas infrastructure, built during the economic boom.[116] The gas crisis offered an opportunity for Enagás and their friends in the Spanish Government to help Europe avoid Russian gas while conveniently taking advantage of their underused infrastructure.


Previously a state monopoly and with the government still the biggest shareholder,[117] Enagás has very close ties to the Spanish administration: no less than 9 of their 13 board members came from government positions, many at the ministerial level.[118]

Construction on MidCat began in 2011 in Catalonia but was halted a year later due to local municipal opposition.[119] The French Government and companies were also getting cold feet over MidCat.

Despite this, MidCat was chosen as a PCI in 2013 and 2015.[120] Enagás' powerful allies included the Spanish Government, and soon, the new Climate and Energy Commissioner Miguel Arias Cañete. Shortly after Cañete moved into the Commission, President Jean-Claude Juncker and the Heads of State of France, Portugal, and Spain signed the Madrid Declaration (4 March 2015) making MidCat an EU strategic priority.[121]

The High Level Group (HLG) for South-West Europe (SEE SECTION ON HIGH LEVEL GROUPS) was launched to provide high-level political support to new gas infrastructure between the three countries, and met four times in 2015 alone.

Cañete is determined to use the HLG to overcome French cold feet, and says the group "will propose solutions to any obstacles identified, be they related to national regulatory and political frameworks, energy market integration or financial matters". He is also intent on securing funding: "The Commission will propose and support concrete actions to implement MidCat, including early involvement of the European Investment Bank to ensure that all sources of European funding are fully explored."[122]

Commissioner Cañete is also in regular contact with Enagás. According to the EU Transparency Register since September 2015 he and his Cabinet met with the gas company five times. However, even with such high-level support, the Spanish gas industry still needs to overcome French hesitancy on behalf of GRTgaz and regulators.

Of the two French companies involved in MidCat, one still needs convincing. GRTgaz, who is only involved once the pipeline reaches France, has spoken out against MidCat as well as publicly complaining of the influence of Spanish lobbying in Brussels.[123] It is supported in its opposition by the French energy regulator, Commission de Regulation d'Energie (CRE), which in June 2016 issued an "unusually strong statement" questioning the merits of MidCat.[124]

But a closer look reveals that two of the six commissioners at CRE are former executives of gas utility Engie, while GRTgaz itself is an Engie subsidiary. Engie is investing massively in LNG, with its own plants in the South of France, and does not want the competition MidCat would bring, calling it a "useless big project."[125]

Neither the communities from the gas extraction sites nor those along MidCat's path will benefit. It will increase the extraction of fracked gas from Algeria, for example, endangering the vast water aquifer under the Sahara, key to life in the region. In 2015 there were unprecedented protests in the Sahara region of Algeria with locals asking the government to put drilling for fracked gas on hold.[126]

The first part of the MidCat pipeline also met with local resistance. The 87km laid to Hostalric in Catalonia made a 30m wide trench destroying everything in its path, and was constructed with no due consultation and assessment. Underground natural gas pipelines often leak into soil and water, meaning MidCat poses a risk to public health and ecology, potentially affecting no fewer than four rivers and several areas of farmland, and zones of biodiversity and cultural interest. Meanwhile French local communities are also beginning to organise.

As the local campaign group in Catalonia, Plataforma Respuesta al MidCat, says, "Catalunya is capable of producing its own renewable energy, rather than supporting the colonial extraction of fossil fuels in Africa. This gas pipeline has no benefit for the local communities, in Catalunya or in Algeria, but instead collectivizes great risks while Enagás and [Spain's ruling party] the PP privatize the profits."


Xavi Arderius

**Local residents gathered in Colobrers, Catalonia on 15 January 2012 to witness the massive destruction created by the construction of the first segment of the MidCat pipeline**

## Revolving doors

Gas players favour hiring ex-officials from the EU institutions and national governments, in order to benefit from the know-how and contact books of these insiders. While it's not surprising that the gas industry makes good use of this revolving door in order to influence decision-making, it is reproachable that the European Commission turns a blind eye to the potential conflicts of interest this practice creates.[127] Incredibly, **Marcus Lippold**, an official at DG Energy in the European Commission, is currently enjoying an authorised sabbatical at **Saudi Aramco**, the state-owned oil and gas company of Saudi Arabia and one of the world's biggest polluters. Ignoring previous complaints, the Commission has actually extended authorisation for this post. Lippold has gone through the revolving door many times: in 2013 he enjoyed another sabbatical from the Commission at **MOL Group**, a leading oil and gas corporation based in central and eastern Europe, and before joining the Commission his employer was **ExxonMobil**.[128]

PR companies are also keen for former political insiders to join their ranks, bringing an intimate knowledge of policy and an ample network of contacts. Until September 2015 **Matthew Hinde** was Head of EU Strategy at the UK government's Department of Energy and Climate Change, but a month later took up a new role in Brussels as Director and Senior Vice-President for Energy at **Fleishman-Hillard** (SEE SECTION ON PR COMPANIES).[129]

The European institutions have equally well-oiled revolving doors. **Constantine Levoyannis** was political advisor to MEP Niki Tzavela in the Committee on Industry, Transport, Research and Energy (ITRE) until October 2014. Tzavela was on the forefront of the fracking battle in the European Parliament and Levoyannis was her advisor on two key reports.[130] A month after he stopped working as an energy advisor in the European Parliament, Levoyannis became a Senior Consultant at **FTI**, one of the biggest PR firms in Brussels (and has since become one of the Directors).[131] FTI's clients include the Trans Adriatic Pipeline (TAP, SEE CASE STUDY), ExxonMobil, Noble Energy, Cuadrilla, and the International Association of Oil & Gas Producers, all with huge interests in the issues Lavoyannis worked at while in the Parliament.

Constantine Levoyannis also has another hat, as Head of the Brussels branch of the **Greek Energy Forum** (GEF) and as such a promoter of the highly controversial TAP, which passes through farmland in Northern Greece (SEE CASE STUDY). GEF is a think tank, not present in the EU's Transparency Register, created to develop the fossil fuel industry in Greece and south-eastern Europe. Its leadership is dominated by companies such as Shell, BP, Cheniere, and ENI.[132] In May 2016, to inaugurate the beginning of TAP's construction in Greece, they organised a conference in Thessaloniki featuring Greek Prime Minister Alexis Tsipras, Commission Vice-President Šefčovič, and 300 high-level guests, including officials from Azerbaijan, Greece, Albania, and Turkey and gas companies with shareholdings in TAP such as BP, SOCAR, Snam, Fluxys, Enagás, and Axpo.[133]

It is clear that both national governments and the European institutions' current revolving door rules are not strong enough to eliminate the risk of conflicts of interest and prevent corporate capture.

BOX 7

### Spanish politicians through the revolving door

A key reason why the Spanish government has become very hostile to renewables in recent years is the revolving door between big energy and government officials.[134]

In Spain the gas industry has fought hard against the advance of renewable energy, (despite the PR campaign to be seen as its ideal partner). Companies such as GasNatural, Endesa, and Enagás (SEE MIDCAT CASE STUDY) have close links with the main political parties, who feed the boards of these and other energy companies.[135] For example **Pedro Solbes**, a former Finance Minister, became the first Spaniard on the board of Italian utility **Enel**. Solbes was in government when Enel won a dispute against GasNatural and E.ON for control of the Spanish utility Endesa. Another case is **Josu Jon Imaz**, who held a number of political roles including in the Ministry of Industry, Trade, and Tourism of the Basque Government. He is currently CEO of **Repsol** and Vice Chair of **Gas Natural**.[136]

The close links between **Climate and Energy Commissioner Cañete** and the oil and gas industry are well known. He was President from 2005 to 2011 of two oil companies, **Petrologis Canarias** and **Petroleos Ducar**, and during his time as Agriculture, Food and Environment Minister in Spain (2011-2014), some of his key decisions benefitted the oil and gas industry. In 2013, in order to bypass regional bans, he brought fracking under control of a national law. In 2014 he approved a biased impact assessment for oil giant Repsol to drill in the Canary Islands, despite huge popular opposition and flaws in the procedure.[137]

Such credentials are why over half a million people signed a petition to ask MEPs to reject his nomination as Climate and Energy Commissioner in late 2014.[138] Cañete is now championing an EU policy that favours the continued use of gas and the building of yet more gas infrastructure.

# Conclusion

The firepower of the gas industry makes it a powerful and effective lobbying force in Brussels and national capitals, while public interest groups have a fraction of the resources and access. Industry spent more than €100m in 2016 according to the voluntary transparency register, and deployed over 1,000 lobbyists plus an army of PR and lobby consultancies, helping to organise events in the European Parliament, secure high level meetings with the Climate and Energy Commissioners, follow policy and, among other things, push the myth that gas is a 'clean' fuel to partner renewables. The gas industry has unrivalled privileged access in decision-making on future energy strategy, thanks to a proactive policy from the Commission and national governments. Industry proximity to decision-makers and their financial power has seen them capture the agenda, with their own profit motives placed before the interest of the climate and the livelihoods of communities along the supply chain.

European Commissioner for Climate and Energy Miguel Arias Cañete came from an oil and gas background and still has close ties, and alongside Vice-President for the Energy Union Maroš Šefčovič, is driving forward the gas industry's agenda at the highest political level with the full collaboration of national leaders. Their plan is to create an integrated EU-wide gas market underpinned by brand new infrastructure and sparkling new trading hubs for the instant buying and selling of gas, with industry placed firmly in the driving seat. National government links to the gas industry run deep; many of the biggest players were previously state-owned, and they remain closely connected with frequently aligned interests (SEE MIDCAT CASE STUDY).

The result is that gas is at the heart of plans for a future EU energy system and the new envisaged infrastructure listed as 'Projects of Common Interest' resemble a gas industry wish-list (SEE ENTSO-G SECTION). The industry spin has been swallowed.

Rather than investing in wind, wave, and solar energy and reducing energy use, the EU's security of supply strategy sees yet more pipelines planned to increase gas from Azerbaijan and Algeria (two countries with poor human rights records), as well as multiple others criss-crossing across Europe. An LNG and storage strategy sees yet more infrastructure being built when the current LNG facilities are operating at less than 25 per cent of their total capacity. Europe is being locked into gas well past the middle of the century when we should be moving away from it. Or, if the EU is actually serious about its commitments under the Paris Agreement, the bill for the over-investment in soon-to-be-stranded assets will be borne by taxpayers and ordinary gas customers, not industry. Either way, allowing the gas industry so much influence over our energy decisions is an environmentally, socially and economically destructive folly.

**Europe is being locked into gas well past the middle of the century when we should be moving away from it**

We are told that the investments are needed to diversify supply to enhance energy security, but by creating energy policy hand-in-hand with the gas industry, the Commission

**BOX 8**

## A firewall against Big Polluters

You wouldn't invite the tobacco industry to design public health policies, so why is the fossil fuel industry involved in climate policy?

UN-body the World Health Organisation (WHO) realised there was an irreconcilable conflict of interest between the profit motive of the tobacco industry and reducing harm from tobacco products. As a result the WHO created a firewall between public health officials and tobacco lobbyists, officially known as 'Article 5.3' within the United Nations Framework Convention on Tobacco Control (UNFCTC). Not only does it cover the UN-level, but also all national and regional governments who sign up to it (which includes the European Commission).[139]

Progressive governments and public interest groups have been pushing for something similar within the UN climate talks, recognising the irreconcilable conflict of interest held by the fossil fuel industry. The EU – led by Commissioner Cañete – and other historical polluters like the US and Australia are doing their utmost to block it.[140]

However, the European Parliament recently passed a non-binding resolution in favour of such a policy at the UN climate talks, instructing the European Commission to support it.[141] As Cañete heads to COP23 in Bonn, he needs to listen to his own Parliament rather than powerful fossil fuel interests and their supportive governments.

and national governments ensure the best solution (massive investment in wind, water and solar energy, and reducing energy use) is not on the table as it doesn't chime with industry profits. The International Energy Agency was warning of the "lock-in of high-carbon infrastructure" back in 2011, and gave 2017 as the 'tipping point' beyond which all new infrastructure would push the world beyond 2ºC, let alone 1.5ºC.[142]

## Recommendations

- **A moratorium on all new gas infrastructure projects:** all gas PCI candidates should be frozen while the list is assessed against plans to stay below 1.5ºC temperature rise, taking into account the EU's responsibility as a rich historical polluter.

- **Full lobby transparency now:** a legally-binding and fully-enforced register is essential to know the true firepower of industry in Brussels. Transparency is essential but the culture within the European institutions means that even when transparency highlights clear cases of privileged access for industry, such as around revolving doors or expert groups, the political will to fix the problem is lacking. Policy-making in the interest of the public rather than industry will require a fundamental shift in culture in the Commission and across EU capitals.

- **A transfer of political and financial support:** the support currently enjoyed by gas should be put behind wind, solar, wave energy, and energy reduction plans, with a focus on community- and publicly-owned infrastructure and projects, given the failure of the market and the big players to transform our economy and energy system away from fossil fuels.

- **An end to the privileged access enjoyed by the gas industry:** as with the tobacco industry, industry inclusion in the policy process is severely stunting ambition. A firewall is needed between policy-makers and the fossil fuel industry at the national, regional, and UN level, and the EU needs to stop blocking and support this process (SEE BOX 8, A FIREWALL AGAINST BIG POLLUTERS).

# ANNEX: Methodology

All data used in the report is from the most recent annual lobbying declarations in the EU Transparency Register of organisations identified as belonging to the gas industry. The report uses the highest bracket for declared spending (eg €200,000 when a range of €100,000-€200,000 is given). While many organisations lobby on other issues besides gas, with the data available it was impossible to disaggregate spending on lobbying related to gas compared to other topics. The report also uses the overall number of lobbyists declared, rather than the full-time equivalent, which is also listed in the register.

A series of techniques was used to identify gas industry players:

- Key words were run through the Transparency Register database ('gas', 'LNG', 'hydraulic fracturing', 'shale', 'Liquefied Natural Gas', 'security of supply') in all European languages and filtering the results to remove those not actively lobbying on gas.

- Scouring the online calendars of Commissioner Miguel Arias Cañete, Vice-President Maroš Šefčovič and their cabinets (November 2014 until 31 August 2017) for meetings with organisations involved in the gas industry or who explicitly discussed gas or gas-related topics;

- Taking the respondents from two landmark consultations ('EU strategy for LNG and gas storage', 'Revision of Regulation (EU) No 994/2010 concerning measures to safeguard security of gas supply') and filtering them (eg excluding national governments).[143]

- Listing all companies and consortia proposing projects under the PCI list.

- Listing all ENTSO-G members, associated partners and observers.

Forty per cent of the organisations identified were not in the register, meaning figures for their spending and lobbyists don't exist. Some organisations are no longer in the register, but as they were actively lobbying in 2016, their last existing entry has been included (SEE BOX 4, OFF THE RADAR). European Gas Limited (whose last registry update was March 2016) erroneously declared €5m, so the figure was excluded.

For lobby consultancies, the report uses the highest reported earnings (eg €200,000 when a range of €100,000-€200,000 is given). The report also assumes that spending on consultancies is included in the declared lobby spending of the clients, as the rules require – although evidence points to this not always being the case (SEE BOX 3, GETTING TO GRIPS WITH THE DATA).

To identify the consultancies working for the organisations lobbying on gas, we also used a variety of techniques:

- Ran the various versions of the names of entities we had identified as lobbying on gas through the client lists of consultancies within the register database.

- Looked through the entire client lists of all those consultancies already identified as working with the gas lobby, and through the client lists of the top 20 highest earning consultancies in Brussels.

The figures on meetings with Commissioner and Vice-President Cañete and Šefčovič and their cabinets come from the European Commission's publicly available lists, but were further refined using the same techniques used in the 2015 'Cooking the Planet' report, which ensures meetings are not double or even triple counted.[144]

For more information on what the data does and doesn't show, SEE BOX 3, GETTING TO GRIPS WITH THE DATA.

# ENDNOTES


**1** Meetings held between November 2014 and August 2017.

**2** Presentation by Hamza Hamouchene from War on Want to conference Fossil Fuel Lock-in: why gas is a false solution, 26-28 September 2016, see http://www.rosalux.eu/topics/social-ecological-transformation/fossil-fuel-lock-in-why-gas-is-a-false-solution/

**3** Nick van den Voort and Frank Vanclay, 'Social impacts of earthquakes caused by gas extraction in the Province of Groningen', Environmental Impact Assessment Review, Vol. 50, 01.2015, p. 1-15, http://www.rug.nl/research/portal/publications/social-impacts-of-earthquakes-caused-by-gas-extraction-in-the-province-of-groningen-the-netherlands(37612317-89ef-4045-993a-21e84a19afbb)/export.html

**4** Presentation by Platform's Emma Hughes to conference Fossil Fuel Lock-in: why gas is a false solution, 26-28 September 2016, see http://www.rosalux.eu/topics/social-ecological-transformation/fossil-fuel-lock-in-why-gas-is-a-false-solution/

**5** Robert W. Howarth, 'A bridge to nowhere: methane emissions and the greenhouse gas footprint of natural gas', presentation to conference 'Fossil Fuel Lock-in: why gas is a false solution', 26-28 September 2016, http://www.rosalux.eu/fileadmin/user_upload/Powerpoints/Howarth-Cornell-Natural-gas-methane-after-cop21.pdf

**6** Eurostat, 'Natural Gas Consumption Statistics', July 2017, http://ec.europa.eu/eurostat/statistics-explained/index.php/Natural_gas_consumption_statistics

**7** Calculations from Food & Water Europe, 15 August 2017, based on raw data from Gas Infrastructure Europe, ALSI, LNG data, https://alsi.gie.eu/#/

**8** The IEA makes a prediction of 30 per cent by 2040 based on 2015 levels, which are 10 per cent lower than today, therefore a 40 per cent cut on today's usage. Presentation by the IEA's Rodrigo Pinto Scholtbach to the 29th Madrid Forum, 6-7 October 2016, see https://ec.europa.eu/energy/sites/ener/files/documents/mf_29_presentations.zip

**9** The new list, which at the time of writing had 130 candidate gas projects, will be decided before the end of 2017.

**10** As part of the Third Energy Package they made two directives (on rules for internal market of electricity, on rules for internal market on natural gas) and three regulations (on establishing ACER, on access to the network for cross-border electricity and access to the natural gas transmission networks), see https://ec.europa.eu/energy/en/topics/markets-and-consumers/market-legislation

**11** Figures for companies cover 2016 activities, where available – or the last updated register entry. As declared spending is provided in ranges, e.g. €100,000-€200,000, the higher bracket has been chosen. All figures are correct as of 31 August 2017, which is when the database was downloaded via www.lobbyfacts.eu

**12** Financial Times, Jamie Smyth, 17 August 2017, 'Shell takes $14bn gas gamble with world's biggest floating structure', https://www.ft.com/content/fa529dd8-832f-11e7-94e2-c5b903247afd?mhq5j=e5

**13** When requesting a list of meetings from DG Energy and DG Climate Action, they declined, saying such a list did not exist. However, other DGs have previously made lists based on available information. For DG Energy see https://www.asktheeu.org/es/request/general_meetings_gas_industry_si#incoming-13351; for DG Climate Action see https://www.asktheeu.org/es/request/midcat_2015_clima#incoming-13683

**14** The two consultations are 'EU strategy for LNG and gas storage' and 'Revision of Regulation (EU) No 994/2010 concerning measures to safeguard security of gas supply', both under the Winter Gas Package. See https://ec.europa.eu/energy/en/consultations/consultation-revision-regulation-eu-no-9942010-concerning-measures-safeguard-security and https://ec.europa.eu/energy/en/consultations/consultation-eu-strategy-liquefied-natural-gas-and-gas-storage

**15** CEFIC, website, 'Cefic's board and Executive Committee Members', accessed 6 October 2017, http://www.cefic.org/About-us/How-Cefic-is-organised/Executive-Committee--Board/

**16** FOEE, 'Fracking Brussels: A who's who of the shale gas lobby', 2014, http://www.foeeurope.org/sites/default/files/publications/foee-fracking-brussels-240714_1.pdf

**17** Food and Water Watch, 'Celts Oppose Fracking While Dragon Ships Bring U.S. Fracked Gas', 3 June 2017, https://www.foodandwaterwatch.org/news/celts-oppose-fracking-while-dragon-ships-bring-us-fracked-gas

**18** Corporate Europe Observatory, 'Dirty Hands on Dirty Deals', 2015 http://www.s2bnetwork.org/wp-content/uploads/2015/09/dirtydeals_small.pdf

**19** General Electric, press release, 'GE completes acquisition of Alstom power and grid businesses', 2 november 2015, http://www.genewsroom.com/press-releases/ge-completes-acquisition-alstom-power-and-grid-businesses-282159

**20** Changerism, 'A Pipeline of Ideas: How the Rotterdam School of Management facilitates climate change by collaborating with the fossil fuel industry', 2017, https://dynamic.decorrespondent.nl/downloads/jelmer-mommers/changerism-a-pipeline-of-ideas.pdf

**21** For more information see http://www.oilandgasclimateinitiative.com/

**22** Bloomberg, 'Exxon, Chevron Say No Thanks to European Peers on Climate', 27 May 2015, http://www.bloomberg.com/news/articles/2015-05-27/exxon-ceo-says-it-won-t-give-lip-service-on-climate

**23** BusinessEurope, 'BUSINESSEUROPE position on security of gas supply', 13 January 2016, https://www.businesseurope.eu/sites/buseur/files/media/position_papers/iaco/2016-01-13_security_of_gas_supply.pdf

**24** European Commission, website, 'List of actions selected for receiving financial assistance under the second CEF Energy 2016 call for proposals', https://ec.europa.eu/energy/sites/ener/files/documents/list_of_all_projects_receiving_eu_support_under_the_current_call.pdf

**25** European Commission, website, 'Consultation on an EU Strategy for liquified natural gas and gas storage', https://ec.europa.eu/energy/en/consultations/consultation-eu-strategy-liquefied-natural-gas-and-gas-storage

**26** Those which have not updated their registry entry but have still been included are: Club Español De La Energia; ERG spa; European Gas Limited; Forum Odbiorców Energii Elektrycznej i Gazu; Iberian Gas Hub (Sociedad Bilbao Gas Hub); Shannon LNG Ltd; SOCAR Representative Office in Belgium; SPP - distribúcia, a.s.; Verbundnetz Gas AG. Information was taken from LobbyFacts.eu, which contains historical records, see https://wwwlobbyfacts.eu

**27** Official Journal of the European Union, 'REGULATION (EC) No 715/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005', http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0036:0054:EN:PDF

**28** ENTSO-G, website, 'Mission', https://www.entsog.eu/mission

**29** The plan is formally known as the Ten Year Network Development Plan (TYNDP). See the 2017 plan here: https://www.entsog.eu/public/uploads/files/publications/TYNDP/2016/entsog_tyndp_2017_ES_web.pdf

**30** European Commission, DG Energy website, Funding for Projects of Common Interest, accessed 7 October 2017, https://ec.europa.eu/energy/en/topics/infrastructure/projects-common-interest/funding-projects-common-interest

**31** Friends of the Earth Europe, Hiding in plain sight: how the EU's gas lobby is at the heart of EU energy policy making, https://www.foeeurope.org/sites/default/files/extractive_industries/2017/entso-g_fossil_free_europe_report_vfinal.pdf

**32** See TEN-E Regulation - N°347 (2013), article XI, http://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex%3A32013R0347

**33** E3G, 'Europe's declining gas demand: trends and facts about gas consumption', 2015, https://www.e3g.org/docs/E3G_Trends_EU_Gas_Demand_June2015_Final_110615.pdf

**34** European Commission Transparency Register, ENTSO-G entry, accessed 6 October 2017 http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=565032821273-72

**35** The three similar amendments were AM 656 (ECR), 657 (EPP), 659 (S&D) (see p.146 of http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+COMPARL+PE-585.421+01+DOC+PDF+V0//EN&language=EN)

**36** 'Robert W. Howarth, 'A bridge to nowhere: methane emissions and the greenhouse gas footprint of natural gas', presentation to conference 'Fossil Fuel Lock-in: why gas is a false solution', 26-28 September 2016, http://www.rosalux.eu/fileadmin/user_upload/Powerpoints/Howarth-Cornell-Natural-gas-methane-after-cop21.pdf

**37** Christophe McGlade and Paul Ekins, 'The geographical distribution of fossil fuels unused when limiting global warming to 2°C', Nature, 517 (7533) pp.187-190. http://www.nature.com/nature/journal/v517/n7533/full/nature14016.html?foxtrotcallback=true

**38** EnergyPost, Karel Beckman, 'Steve Holliday, CEO National Grid: "The idea of large power stations for baseload is outdated"', 11 September 2015, http://energypost.eu/interview-steve-holliday-ceo-national-grid-idea-large-power-stations-baseload-power-outdated/

**39** Catherine Mitchell, 'Momentum is increasing towards a flexible electricity system based on renewables', 1 February 2016, Nature Energy, https://www.nature.com/articles/nenergy201530

**40** World Meteorological Organization, 'WMO confirms 2016 as hottest year on record, about 1.1°C above pre-industrial era', 18 January 2017, https://public.wmo.int/en/media/press-release/wmo-confirms-2016-hottest-year-record-about-11%C2%B0c-above-pre-industrial-era

**41** Letter sent on 16 October 2017 to the European Commission by civil society groups on the preparation of the 3rd list of energy Projects of Common Interest, https://cloud.foeeurope.org/index.php/s/ICFMfPNA1MGtz2G

**42** E3G, 'More Security, Lower Cost A Smarter Approach To Gas Infrastructure In Europe', 2016, http://www.climact.com/sites/default/files/e3g_more_security_lower_cost_-_gas_infrastructure_in_europe_-_mar_2016.pdf

**43** Eurostat, 'Natural Gas Consumption Statistics', July 2017, http://ec.europa.eu/eurostat/statistics-explained/index.php/Natural_gas_consumption_statistics

**44** This is in part due to EU legislation, which broke up many large state-run energy companies and forced the sale and separation of different parts of the supply chain – although not always with the desired outcome.

**45** CDP, 'The Carbon Majors Database: CDP Carbon Majors Report 2017', 2017, https://b8f65cb373b1b7b15feb-c70d8ead6ced550b4d987d7c03fcdd1d.ssl.cf3.rackcdn.com/cms/reports/documents/000/002/327/original/Carbon-Majors-Report-2017.pdf?1501833772

**46** French member GRTgaz is owned by Engie, while compatriot TIGF was sold by Total in 2013 to EDF and Snam; Hungarian FGSC is owned by MOL while Dutch member Gasunie was originally founded by Shell and is still closely linked.

**47** European Commission Transparency Register, Gas Infrastructure Europe entry, http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=76130992074-15 last accessed 1 October 2017

**48** European Commission, DG Competition website, 'Gas', accessed 7 October 2017 http://ec.europa.eu/competition/sectors/energy/gas/gas_en.html

**49** Engie, website, "Natural gas at the heart of energy transition", accessed 7 October 2017, http://www.engie.com/en/natural-gas-energy-transition/

**50** GRAIN, 'The Exxons of Agriculture', 2015, https://www.grain.org/article/entries/5270-the-exxons-of-agriculture

**51** Ibid.

**52** Gas4Sea, 'The Right Time for LNG', http://www.gas4sea.com/the-right-time-for-lng/

**53** The other two sections of the ECMP are the Southern Caucus Pipeline Expansion from Azerbaijan to the Turkish border through Georgia, and the Trans Anatolian Pipeline (TANAP) across Turkey until Greece.

**54** Reuters, Fouche and Solsvik, 'Statoil exits Shah Deniz gas project with stake sale to Petronas', 13 October 2014, https://www.reuters.com/article/us-statoil-petronas-shahdeniz/statoil-exits-shah-deniz-gas-project-with-stake-sale-to-petronas-idUSKCN0I209020141013

**55** TAP AG, website, 'TAP at a glance', accessed 7 October 2017, https://www.tap-ag.com/the-pipeline

**56** Eurogas, 'More gas use in 2015 and 2016 makes CO2 emissions tumble', 10 April 2017, http://www.gasnaturally.eu/mediaroom/download/164/document/eurogas-press-release---more-gas-use-in-2015-and-2016-makes-co2-emissions-tumble.pdf

**57** Platform London, 'Bribes, bulldozers and BP: what makes a gas mega pipeline?', 7 September 2017, http://platformlondon.org/2017/09/07/bribes-bulldozers-and-bp-what-makes-a-gas-mega-pipeline/

**58** See their facebook page: https://www.facebook.com/MovimentoNoTAP/?source=conf&utm_medium=email&utm_source=actionkit

**59** European Stability Initiative, 'Caviar diplomacy: how Azerbaijan silenced the Council of Europe', 2012, http://www.esiweb.org/pdf/esi_document_id_131.pdf

**60** On the drawing of lots, see Paolo Mondani, 'Transcript of news programme 'Caviar Democracy', 21 November 2016, Rai TV, http://www.rai.it/dl/docs/1481650085978caviar_democracyOKOK.pdf; on the political prisoner report in PACE, see ESI, 'Azerbaijan debacle: The PACE debate on 23 January 2013, 21 February 2013, http://www.esiweb.org/index.php?lang=en&id=156&document_ID=136

**61** Anna Mazzone, 'Azerbaijan: Pino Arlacchi Embarrasses Europe', 29 October 2013, Panorama.am, http://www.panorama.am/en/politics/2013/10/29/panorama-italy-about-az/

**62** The Guardian, Luke Harding, Caelainn Barr and Dina Nagapetyants, 'UK at centre of secret $3bn Azerbaijani money laundering and lobbying scheme', 4 September 2017, https://www.theguardian.com/world/2017/sep/04/uk-at-centre-of-secret-3bn-azerbaijani-money-laundering-and-lobbying-scheme

**63** The Bulgarian Prosecutor-General has opened an investigation into Bulgarian national Mitrev, see Sofia Globe, ''Azerbaijani laundromat' reports: Bulgarian Prosecutor-General orders probe of Mitrev', 7 September 2017, http://sofiaglobe.com/2017/09/07/azerbaijani-laundromat-reports-bulgarian-prosecutor-general-orders-probe-of-mitrev/; meanwhile President of the Southern Gas Corridor Closed Joint Stock Company (SGCCJSC), Yaqub Eyyuboc (also Azerbaijan's First Deputy Prime Minister), "used a shell company at the heart of the Azerbaijani Laundromat to pay medical bills worth tens of thousands of dollars... At the same time, a bank account in Budapest belonging to one of his sons was receiving millions through the Laundromat". Eyyuboc is considered one of Azerbaijan's most important politicians, and has been in charge of the country's oil and gas strategy since 2009. See The Organised Crime and Corruption Reporting Project (OCCRP), 'Azerbaijan's High-Profile Beneficiaries', 5 September 2017, https://www.occrp.org/en/azerbaijanilaundromat/azerbaijans-high-profile-beneficiaries

**64** Ilgar Mammadov, 'A letter from an inmate of the Southern Gas Corridor', 20 January 2017, https://www.opendemocracy.net/od-russia/ilgar-mammadov/open-letter-from-inmate-of-southern-gas-corridor

**65** TEAS LobbyFacts entry, accessed 28 September 2017, https://lobbyfacts.eu/representative/79cf5f9b402e4201bce34b76ad2893c1/the-european-azerbaijan-society-brussels-and-benelux-office

**66** Dentons, website, 'James E. Hogan, Office Managing Partner', https://www.dentons.com/en/james-hogan

**67** The European Energy Forum, 'Programme', 16 January 2014, http://www.ibde.org/component/content/article/240-programme-european-energy-forum.html

**68** TEAS, 'TEAS moves and renames office to TEAS Benelux', 5 October 2016, http://teas.eu/press-release-new-name-new-office-teas-benelux-diplomatic-heart-brussels

**69** L'Echo, Lars Bové and Pieter Haeck, 'Des sociétés belges arrosées par l'Azerbaïdjan', 5 September 2017, https://www.lecho.be/economie-politique/belgique-general/Des-societes-belges-arrosees-par-l-Azerbaidjan/9929061; L'Echo, Lars Bové, 'Alain Destexhe compromis par de l'argent azéri', 12 September 2017, https://www.lecho.be/economie-politique/belgique-general/Alain-Destexhe-compromis-par-de-l-argent-azeri/9931304?ckc=1&ts=1507022287

**70** De Tijd, Lars Bové, 'Verwilghen stopt als lobbyist voor Azerbeidzjan', 7 September 2017, https://www.tijd.be/politiek-economie/belgie-federaal/Verwilghen-stopt-als-lobbyist-voor-Azerbeidzjan/9929791

**71** Fluxys has received and continues to receive PCI support for numerous projects, either directly or via subsidiaries and co-owned projects, e.g. Fluxys TENP, Interconnector UK and Swedegas.

**72** Fluxys, website, 'Shareholder Structure on 31.12.2016', accessed 29 September 2017, http://www.fluxys.com/belgium/en/Financial%20info/ShareholdersStructure/Shareholders

**73** TEAS, 'Azerbaijani And Belgian Energy Specialists Discuss Future Dynamic Collaboration', 18 March 2015, http://teas.eu/press-release-azerbaijani-and-belgian-energy-specialists-discuss-future-dynamic-collaboration

**74** Ibid.

**75** Maroš Šefčovič, Video: 'Visit of Maroš Šefčovič, Vice-President of the EC to Azerbaijan: opening speech, at the 3rd Ministerial Meeting of the Southern Gas Corridor Advisory Council', 23 February 2017, https://ec.europa.eu/avservices/video/player.cfm?ref=I133927

**76** Correspondence between Counter Balance and Maroš Šefčovič, seen by CEO

**77** Reuters, Alissa Carbonnel and Oleg Vukmanovic, 'EU gets wake-up call as Gazprom eyes rival TAP pipeline', 14 February 2017, http://uk.reuters.com/article/uk-gazprom-eu-tap/eu-gets-wake-up-call-as-gazprom-eyes-rival-tap-pipeline-idUKKBN15T27M

**78** For more detailed information on the work of PR companies for dirty energy in the EU see Corporate Europe Observatory, 'The climate smokescreen - PR companies lobbying for big polluters in Europe', 2015, https://corporateeurope.org/climate-and-energy/2015/12/europe-pr-firms-greenwashing-big-polluters

**79** Figures are based on declarations in the transparency register, using the highest end of the listed bracket, e.g. €100,000-200,000 would be counted as €200,000.

**80** Corporate Europe Observatory, 'Foot on the Gas: Lobbyists push for unregulated shale gas in Europe', 2012, https://corporateeurope.org/sites/default/files/shale_gas_lobby_final.pdf

**81** An email, seen by CEO, was sent on 27 March 2017 to MEP assistants by FTI Consulting inviting them to attend the ExxonMobil 'Have your say' event.

**82** Fleishman-Hillard has clients involved in oil and gas, fracking, mining, and a number of banks that are major oil investors. They include SHV Energy, Exxon, French DSO GRDF, the chemical lobby CEFIC, Centrica, Eurelectric, BP, Enel and Snam. See their profile in LobbyFacts https://lobbyfacts.eu/representative/9fcd8aa5ed924ac899657be9f5faab1e/fleishman-hillard

**83** GasNaturally, Joint declaration by a group of industry associations, '2016, time to deliver... an ambitious power market reform', 2016, http://www.gasnaturally.eu/uploads/Joint_Declaration_by_a_Group_of_Indutry_Associations_2.pdf

**84** GasNaturally, 'GasNaturally joins industry associations in urging the EU to deliver a flexible and dynamic electricity market', 6 April 2016, http://www.gasnaturally.eu/mediaroom/147/39/GasNaturally-joins-industry-associations-in-urging-the-EU-to-deliver-a-flexible-and-dynamic-electricity-market

**85** Free Choice, 'White Paper: Policy Recommendations for Sustainable Rural Communities in Europe', 2012, http://www.rural-energy.eu/uploads/documents/freewhitepaper.pdf

**86** Gas Infrastructure Europe, 'Gas Makes a Clean Future Real for Europe. Launch of the 'GasNaturally' initiative to demonstrate the importance of gas in the Energy Roadmap 2050', 6 December 2011, http://www.gie.eu/index.php/13-news/gie/140-press-release-gie-06-12-2011

**87** Ibid.

**88** For more information, see http://makepowerclean.eu/

**89** G Plus declares an income of €100,000-€200,000 from Gazprom Exports in the register, yet also says that "revenue from work on competition cases" is excluded from its declaration, which is exactly the sort of work it would have been doing for Gazprom. EUObserver investigations have also revealed that Gazprom is paying millions for services to a company owned by the GPlus parent company Omnicom, meaning Gazprom's contract with G Plus could be far higher. https://euobserver.com/foreign/128403

**90** In the GPlus registry entry is a client 'Ketchum (Sigma)', who is the PR firm for the Kremlin in Washington. In the 2014 registry entry, Ketchum was listed as 'Ketchum (for Russian Federation)'. See https://web.archive.org/web/20140405065311/http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=7223777790-86

**91** G Plus Europe, website, 'Time Price, deputy chairman', http://gpluseurope.com/team/tim-price/

**92** Euobserver, Andrew Rettman, 'Putin threatens to cut gas to Ukraine, EU countries', 10 April 2014, https://euobserver.com/economic/123820

**93** Energy Post, Danila Bochkarev, 'Gazprom plays ball: the depoliticization of the European gas market', 25 January 2017, http://energypost.eu/depoliticization-european-gas-market/

**94** GasNaturally sent two open letters to heads of state ahead of European Council meetings, in March and then October 2014. See GasNaturally, 'GasNaturally shares its views on EU 2030 Framework with Heads of State ahead of European Council', 17 March 2014, http://www.gasnaturally.eu/mediaroom/120/40/GasNaturally-shares-its-views-on-EU-2030-Framework-with-Heads-of-State-ahead-of-European-Council; GasNaturally, 'Open Letter to Heads of State regarding the 2030 Framework', 21 October 2014, http://www.gasnaturally.eu/mediaroom/129/40/Open-Letter-to-Heads-of-State-regarding-the-2030-Framework

**95** GasNaturally, website, 'Innovation at Gas Week 2016', accessed 9 October 2017, http://www.gasnaturally.eu/events/gasweek-2016

**96** At the 2014 Gas Week http://www.gasnaturally.eu/events/gas-week-2014/debate-energy-infrastructure-and-security-of-supply; At the 2015 Gas Week http://www.gasnaturally.eu/gas-week-2015/test; at a dinner debate in July 2017 http://www.gasnaturally.eu/mediaroom/168/83/Debate-hosted-by-MEP-Adina-Ioana-Valean-finds-gas-is-key-to-delivering-effective-amp-affordable-Clean-Energy-Package

**97** FOEE, 'Fracking Brussels: A who's who of the shale gas lobby', 2014, http://www.foeeurope.org/sites/default/files/publications/foee-fracking-brussels-240714_1.pdf

**98** Corporate Europe Observatory and Friends of the Earth Europe, 'Ending the affair between polluters and politicians', 2014, https://corporateeurope.org/climate-and-energy/2014/03/ending-affair-between-polluters-and-politicians

**99** The Guardian, Arthur Neslen, 'Fossil fuel firms accused of renewable lobby takeover to push gas', 22 January 2015, https://www.theguardian.com/environment/2015/jan/22/fossil-fuel-firms-accused-renewable-lobby-takeover-push-gas

**100** Ibid.

**101** Gas Coordination Group entry in Expert Group Register, 'Details', accessed 29 September 2017, http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetail&groupID=1096

**102** The trade associations sitting in the group are EURELECTRIC, Eurogas, Euroheat & Power, European Federation of Energy Traders (EFET), ENTSO-G, Gas Infrastructure Europe (GIE), International Association of Oil and Gas Producers (IOGP), and the International Federation of Industrial Energy Consumers (IFIEC) Europe.

**103** Within the Gas Coordination Group, Exxon has one seat from IOGP, Fluxys from GIE, ENGIE and RWE from EURELECTRIC and fertiliser company Yara and chemicals company Solvay have a seat each from IFIEC Europe, see http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetail&groupID=1096&NewSearch=1&NewSearch=1

**104** Corporate Europe Observatory, 'The Commission's new rules on Expert Groups: the good, the bad, the ugly and the even uglier,' June 2016, https://corporateeurope.org/expert-groups/2016/06/commissions-new-rules-expert-groups-good-bad-ugly-and-even-uglier

**105** Corporate Europe Observatory and Friends of the Earth Europe, 'Carte Blanche for Fracking: How the European Commission's new advisory group is letting the shale gas industry set the agenda', 2015, https://corporateeurope.org/climate-and-energy/2015/04/carte-blanche-fracking

**106** European Commission, 'Transatlantic knowledge sharing conference on unconventional hydrocarbons: resources, risks, impact and research needs', Calendar entry 20-21 June 2017, https://europa.eu/newsroom/events/transatlantic-knowledge-sharing-conference-unconventional-hydrocarbons-resources-risks-impact_en

**107** Mike Bradshaw, 'Public Understanding of the Environmental and Social Impact of Shale Gas Development', Presentation to 'Transatlantic knowledge sharing conference on unconventional hydrocarbons: resources, risks, impact and research needs', Wednesday 21 June 2017, https://ec.europa.eu/jrc/sites/jrcsh/files/p41-bradshaw.pdf

**108** European Commission, 'High Level Group on Central and South Eastern Europe Gas Connectivity – CESEC, Terms of Reference', 9 February 2015, https://ec.europa.eu/energy/sites/ener/files/documents/CESEC%20MoU%20Annex%20I_Terms%20of%20Reference%20HLG%20CESEC_FINAL%209%20February%20Sofia.pdf

**109** European Commission, website, 'Baltic Energy Market Interconnection Plan', accessed 8 October 2017, https://ec.europa.eu/energy/en/topics/infrastructure/baltic-energy-market-interconnection-plan

**110** European Commission, website, 'Madrid Forum, 19 October 2017 to 20 October 2017', https://ec.europa.eu/energy/en/events/madrid-forum, accessed 26 May 2017.

**111** In 2014 and 2015 there were no civil society participants. For a full list of participants see https://ec.europa.eu/energy/en/madrid-forum-previous-meetings

**112** European Commission, '27th Gas Regulatory Forum Attendance List of 20 and/or 21 April 2015', http://ec.europa.eu/energy/sites/ener/files/documents/GASFORUM-attendance.pdf

**113** European Commission, 'Twenty-ninth meeting of the European Gas Regulatory Forum 6-7 October 2016', 7 October, 2016, https://ec.europa.eu/energy/sites/ener/files/documents/29th_mf_conclusions_adopted.pdf

**114** Corporate Europe Observatory, 'Driving Into Disaster: How the EU's Better Regulation agenda fuelled Dieselgate', 2017, https://corporateeurope.org/power-lobbies/2017/02/driving-disaster

**115** It is intended to transport 7 billion cubic metres a year (bcm/y), putting Spain's total interconnection with France at 15.1 bcm/y.

**116** ODG, 'Trampa Global del Gas: un puente al desastre', 2017, http://www.rosalux.eu/fileadmin/user_upload/Publications/2017/Trampa_global_del_gas.pdf

**117** SEPI, the Spanish state corporation to manage government shares in different companies, owns 5 per cent of Enagás. For more information see http://www.sepi.es/default.aspx?cmd=0004&IdContent=30396&idLanguage=

**118** #YoIBEXtigo, José Bautista, Las puertas giratorias de Enagás: récord de consejeros del PP', 21 July 2017, https://www.yoibextigo.lamarea.com/informe/enagas/quienes-son/puertas-giratorias-enagas/

**119** Viladecavalls municipality rejected the construction of the gas pipeline arguing there was a change in the approved route, see Europa Press, 'Enagas confía en desbloquear el gasoducto con Francia por Catalunya entre finales de año y 2013', 15 May 2012, http://www.europapress.es/catalunya/noticia-enagas-confia-desbloquear-gasoducto-francia-catalunya-finales-ano-2013-20120515115347.html

**120** The 3rd interconnection between Spain and Portugal was also made a PCI.

**121** European Commission, 'Madrid Declaration', 4 March 2015, https://ec.europa.eu/energy/sites/ener/files/documents/Madrid%20declaration.pdf

**122** Answer given by Commissioner Arias Cañete on behalf of the Commission to question by MEP Francesc Gambús, http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2016-000141&language=EN

**123** Olivier Aubert, Chief Strategy and Marketing Officer at GRTgaz, speaking at GAZELEC Conference 2015, October 13-15, see https://congresgazelec.com/bestof.html

**124** EurOil - Europe Oil & Gas, 'French regulator questions benefit of MIDCAT pipeline', 23 June 2016, https://newsbase.com/topstories/french-regulator-questions-benefit-midcat-pipeline

**125** Engie's Philippe Vedrenne, speaking at GAZELEC Conference 2015, October 13-15, see https://congresgazelec.com/bestof.html

**126** CIDOB, 'Opposition to fracking fuels a wider debate', March 2015, https://www.cidob.org/es/publicaciones/serie_de_publicacion/opinion/mediterraneo_y_oriente_medio/opposition_to_fracking_fuels_a_wider_debate

**127** For more examples of revolving doors cases between the Commission and the energy industry see Corporate Europe Observatory, 'Brussels, big energy, and revolving doors: a hothouse for climate change', 2015, https://corporateeurope.org/revolving-doors/2015/11/brussels-big-energy-and-revolving-doors-hothouse-climate-change

**128** Corporate Europe Observatory, 'Brussels, big energy, and revolving doors: a hothouse for climate change', 2015, https://corporateeurope.org/revolving-doors/2015/11/brussels-big-energy-and-revolving-doors-hothouse-climate-change

**129** LinkedIn profile of Matt Hinde, accessed 16 October 2017, https://www.linkedin.com/in/matt-hinde-836a2bb2/

**130** The two reports in question were "Industrial, energy, and other aspects of shale gas and oil", 2012, http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A7-2012-0284&language=EN and "Energy roadmap 2050, a future with energy", 2012, http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P7-TA-2013-0088+0+DOC+XML+V0//EN

**131** LinkedIn profile of Constantine Levoyannis, accessed 16 October 2017, https://www.linkedin.com/in/constantine-levoyannis-24474a50/

**132** Greek Energy Forum, website, 'About', accessed 16 October 2017, https://www.greekenergyforum.com/about/

**133** Revelle Group, Terpsi Ketegeni, 'The European Energy Union: Turning the Vision into Reality', 20 May 2016, http://www.revellegroup.com/blog/the-european-energy-union-turning-the-vision-into-reality/

**134** See for instance: El Diario, 'Energias Renovables, las causas de su freno', 19 September 2013, http://www.eldiario.es/canariasahora/energia/Energias-renovables-causas-freno_0_176383420.html; Greenpeace Spain, 'Iberdrola, empresa enemiga de las renovables', 29 May 2013, http://www.greenpeace.org/espana/es/reports/Iberdrola-empresa-enemiga-de-las-renovables/; La Sexta, 'Las puertas giratorias ¿responsables de las trabas a la energía solar en España?', May 2017, http://www.lasexta.com/programas/sexta-columna/noticias/las-puertas-giratorias-responsables-de-las-trabas-a-la-energia-solar-en-espana_20170519591f57490cf25e0177e8b278.html

**135** Puertas Giratorias, 'energia', accessed 17 October 2017, http://www.puertasgiratorias.org/

**136** Repsol, website, 'Chief Executive Officer, Josu Jon Imaz San Miguel', accessed 17 October 2017, https://www.repsol.energy/en/about-us/our-team/organizational-chart/josu-jon-imaz/index.cshtml

**137** Corporate Europe Observatory, 'The many business dealings of Commissioner-designate Miguel Arias Cañete', 23 September 2014, https://corporateeurope.org/power-lobbies/2014/09/many-business-dealings-commissioner-designate-miguel-arias-canete

**138** Avaaz, petition, 'A "Petrolhead" as the next Climate Commissioner?', https://secure.avaaz.org/en/canete_climate_pa_uk/?pv=81&rc=fb

**139** To find out more, visit the Corporate Accountability International (CAI) website, https://www.stopcorporateabuse.org/global-tobacco-treaty

**140** Desmog Blog, Pascoe Sabido, 'Glacial Progress at Bonn Climate Talks Shows Why we Need to Exclude Big Polluters From Negotiations', 24 May 2017, https://www.desmogblog.com/2017/05/24/op-ed-glacial-progress-bonn-climate-talks-shows-why-we-need-exclude-big-polluters-negotiations and New York Times, Hiroko Tabuchi, 'Vulnerable Voices' Lash Out as Companies Sway Climate Talks', 16 May 2017, https://www.nytimes.com/2017/05/16/climate/corporations-global-climate-talks-bonn-germany.html

**141** DeSmogUK, Mat Hope, 'European Parliament: Say No to Fossil Fuel Lobbying at International Climate Talks', 4 October 2017, https://www.desmog.uk/2017/10/04/european-parliament-say-no-fossil-fuel-lobbying-international-climate-talks

**142** Fatih Birol, IEA Chief Economist, quoted in IEA Press Release, 'The world is locking itself into an unsustainable energy future which would have far-reaching consequences, IEA warns in its latest World Energy Outlook', 9 November 2011, https://www.iea.org/newsroom/news/2011/november/the-world-is-locking-itself-into-an-unsustainable-energy-future.html

**143** European Commission, webpage, 'Consultation on the Revision of Regulation (EU) No 994/2010 concerning measures to safeguard security of gas supply', https://ec.europa.eu/energy/en/consultations/consultation-revision-regulation-eu-no-9942010-concerning-measures-safeguard-security; European Commission, webpage, "Consultation on an EU strategy for liquefied natural gas and gas storage", https://ec.europa.eu/energy/en/consultations/consultation-eu-strategy-liquefied-natural-gas-and-gas-storage

**144** Corporate Europe Observatory, 'Cooking the Planet since 2014: Big Energy's year of privileged access to Europe's climate commissioners', 2015, https://corporateeurope.org/sites/default/files/attachments/caneteŠefčovič_small.pdf

CEO