Feedback to the call for evidence opened by the European Commission on the Revision of the EU Energy Security Framework

Introduction

The Russian full scale invasion of Ukraine and the 2022 energy crisis have shown that fossil fuel dependence is the principal driver of energy insecurity[1], high energy prices[2], social injustice and vulnerability to geopolitical crises.

The revision of the Energy Security Framework must contribute to stopping fossil fuel dependence from Russia, the United States[3] or other countries which undermine the EU's climate objectives under the Paris Agreement and the European Green Deal. The EU needs to look at energy security in terms of the whole system with the understanding that a fossil fuel-based system does not work for Europe's security, nor for its economy[4]. This has also been underlined earlier this year by 97% of business leaders[5] (EU and globally) who are backing a move away from fossil fuels.

It also needs to incorporate threats from climate change impacts on infrastructure, supply and demand side (heat waves, droughts, floods..). The slow moving impacts of climate change and their impact on energy security should be incorporated when planning, especially the long-term energy infrastructure. Impacts of sea-level rise and corresponding increase of risk of flooding over time as well as the changes in the availability (including seasonal availability) of water in the inland water ecosystems (lakes, rivers etc) and their temperature variations. This review needs to adopt a planning perspective for a world that will be at least 1.5 degrees hotter by mid-century with all the implications for the future energy system and its security.

The revision also gives an opportunity to take a cross-sector, future proof approach by further integrating the EU's energy system while taking into account the demand side. Energy Security Risk Assessments should take into account increasing levels of electrification[6] also due to decentralized production of

[1] European Union Institute for Security Studies (EUISS), *Reimagining European Energy Security: Towards a Whole-of-System Approach,* Brief, 18 February 2025, https://www.iss.europa.eu/publications/briefs/reimagining-european-energy-security-towards-whole-system-approach

[2] EMBER, *Decoupled: how Spain cut the link between gas and power prices using renewables*, Ember insights, 2 October 2025,

[3] European Union Institute for Security Studies (EUISS), *Keep Calm and Carry On: The EU's Energy Transition Should Not Bow to Trump*, Commentary, 30 April 2025,

[4] In that context, it is worthwhile mentioning that Financial institutions, academics and CSOs have recently called for the exclusion of companies financing fossil fuels projects from a critical finance regulation (SFDR). Reclaim Finance, *Open Letter to the European Commission on SFDR Review*, 30 September 2025.

[5] New polling indicates a global tipping point on business attitudes to renewable energy shift. See: *Global Business Poll: Powering Up*, April 2025, https://powering-up-business-poll.com/

[6] The Commission's Impact Assessment for the European Climate Law projects 50-60% of final energy demand to be electrified whereas CAN Europe's PAC scenario has an electrification rate of almost 70%. See: CAN Europe, *Paris Agreement Compatible Scenario 2024*, September 2024

renewables based electricity produced via Energy Communities and Energy Sharing schemes, which is a way to improve resilience of the energy sector.

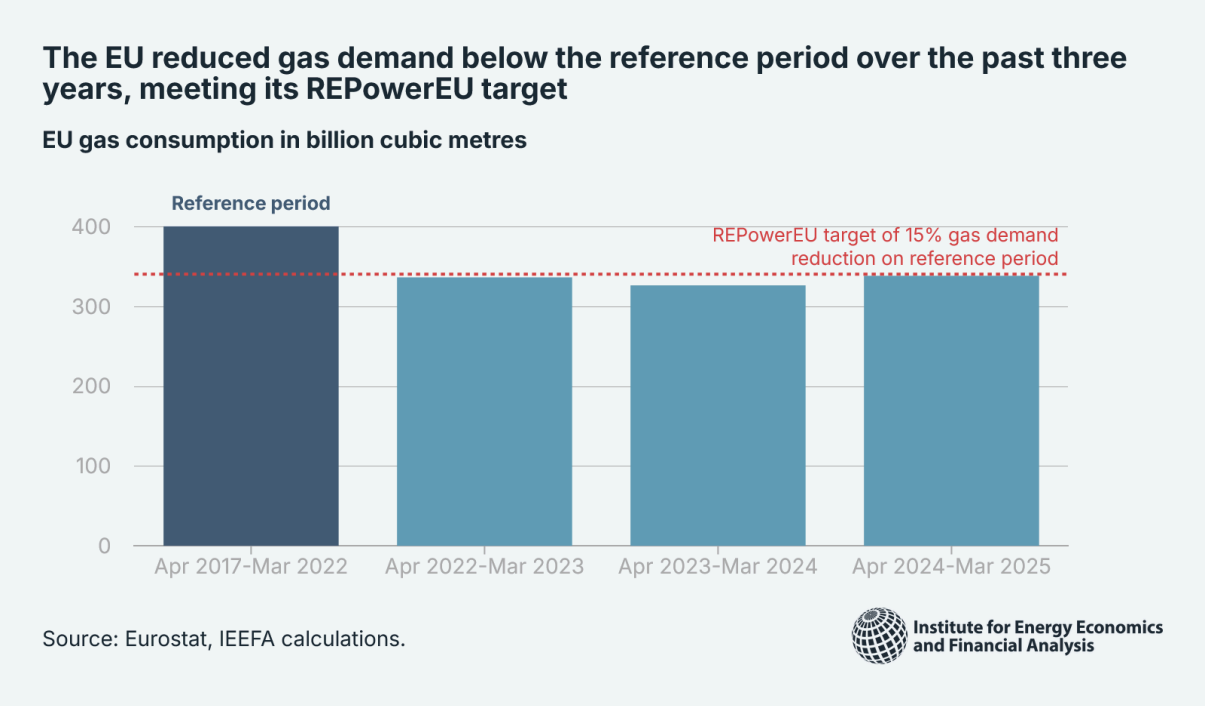
An integrated energy security framework should be in line with developments under the Ten-Year Network Development planning (TYNDP) and Energy System Integration (ESI) frameworks.

More energy security can be achieved by adapting to a new and integrated energy system that works with **energy savings leading to reduced gas demand, increased renewables based and cross border electrification as well as flexible non-fossil storage solutions.**

1. Principles and key recommendations for a climate-proof, fossil-free Energy Security Framework

a) Gas demand reduction

During the energy crisis in 2022, the European Union agreed on measures under Regulation 2022/1369 to lower its reliance on Russian fossil fuels. Since then the EU's gas demand has consistently decreased (peaking at 20% cuts in 2023/24), and **maintaining in Q1 2025 its REPower EU target of 15% reduction on the reference period.**



To stabilise and pursue this steady reduction the following points should be considered:

- **A mandatory gas saving target:** Make the Council's Regulation 2022/1369 binding and include a mandatory gas saving target of minimum 20% in the Energy Security Regulation. Include gas and energy savings pathways in Risk Preparedness Plans and National Energy & Climate Plans (NECPs) in line with the EU Green Deal and the Paris Agreement.

- **Cut methane emissions**: Methane leaks and venting represent a direct loss of energy supply and security. The Energy Security Framework should set a binding methane emissions reduction target of at least 75 % by 2030 for methane emissions from the energy sector, including upstream methane emissions. This should be enshrined in the **infrastructure standards and monitoring and transparency objectives of the revision**. It should also strengthen infrastructure monitoring for leak detection and repair, mandatory reporting, and enforcement mechanisms that will also strengthen the overall security of gas infrastructure through more frequent checks and replacement of outdated energy infrastructure. Relevant provisions from the EU Methane Regulation should be cross referenced and integrated.

b) Non fossil diversification

The revision needs to acknowledge the impact of the EU's dependency on fossil fuels as a vector of insecurity, vulnerability and contributor to the climate crisis, creating unpredictable risks on energy supply, demand and infrastructure. Diversifying the gas supply sources is not a solution to energy security: relying on LNG is making the EU gas market more vulnerable to geopolitical events.

- **Diversification plans:** Diversification must focus on energy efficiency, renewables, demand-side flexibility, and non-fossil storage solutions. The revision of the Energy Security Framework should build on relevant provisions regarding national diversification plans from the REPowerEU Commission proposal for a Regulation.
- **Prioritize energy efficiency as the first line of defence**: The revised framework should require all risk assessments, national preventive action plans, and risk preparedness plans to demonstrate how long-term energy savings measures are prioritised as the first line of defence against supply risks.
- **Non fossil storage and incentives for flexibility:** The framework should actively promote accelerated deployment of batteries, pumped hydro, thermal storage, compressed air, demand-side response, and renewable hydrogen (only for hard-to-abate sectors). The revision should ensure storage infrastructure and demand-side flexibility are recognised as a network asset, eligible for incentives under EU funding and market design rules. Fossil-based storage or backup must be excluded from future planning.
- **Expanded and better secured cross-border power lines against grid failures or geopolitical threats:** The framework should ensure that existing power interconnectors are secured from sabotage, and new cross-border electricity transmission lines are planned and deployed, especially in regions with the highest risk of technical or political incidents and lacking cross-border capacity. Interconnectors helped Europe get through blackouts and attacks, enabling faster recovery from disturbances and strengthening energy security; however, 55% of Europe's power system has limited electricity import options, increasing the risk of blackouts and energy blackmail[7].
- Implement the **EU electricity interconnection target** of at least 15% by 2030, with a focus on cross-border infrastructure enabling surplus and deficit balancing. Prioritise maximising the use of existing electricity infrastructure before building new assets.

c) Integrated infrastructure planning and standards

- Ensure Member States will perform robust **national flexibility needs assessments** which take into account the needs of the demand side (Electric Vehicles, heat pumps, data centres etc) and the flexibility options to allow for better risk preparedness.
- **N-1 Standard:** While it is important to ensure back up in the event of a failure of electricity supply infrastructure, the security of supply needs to be approached differently for gas infrastructure**.** As the gas grid will be built back because of shrinking volumes of gas in the energy mix, unnecessary costs through stranded assets, and outdated backup logic have to be avoided. The N-1 principle for gas should be reviewed in conjunction with gas infrastructure decommissioning plans (Art. 57, Directive 2024/1788) and the buildup of electricity grid infrastructure and infrastructure for renewable hydrogen in priority sectors only.

[7] EMBER, *New lines of defence: how interconnectors keep the lights on*, 24 September 2025.

d) Climate-Proof governance, planning, and transparency

- **Smart streamlining without deregulation**: CAN Europe would like to highlight that the Commission's "smart streamlining" narrative risks sliding into deregulation. Infrastructure standards, monitoring, reporting, and market transparency (especially for gas markets) are essential for security and cannot be weakened. Simplification can not lead to deregulation. Climate and environmental obligations must remain fully in place. The best protection against climate risks is to reduce emissions and fossil fuel dependency.
- **Reform the composition of the Gas and Electricity Coordination Groups**: Ensure that electricity network and flexibility storage representatives are adequately represented in those groups. Stakeholders involved in infrastructure and risk preparedness planning need to reflect high electrification rates i.e. electricity TSOs and DSOs, flexibility and storage partners, should be adequately represented. In addition, advice from independent stakeholders, such as the European Scientific Advisory Board for Climate Change (ESABCC), and their reviews of the TYNDP planning cycle, should be prioritised. The Gas and Electricity Coordination Groups should be merged to ensure best possible joint planning and risk assessment.
- **Integrated risk assessment and preventive plans**: The framework should require integrated risk preparedness plans and preventive action plans that cover all energy carriers, prioritise demand-side and renewable measures, reflect cross-border impacts, and scenario stress-tests against climate extremes, supply disruptions, and high renewable variability. An **indicator for a joint risk assessment** could be volatility of prices. We have seen in the past that **high gas price volatility** and extreme dependence has led to a highly impacting energy crisis.
- **Challenges around demand side**: a strategic look needs to be taken at the demand side and new aspects of energy transition such as the increasing electricity demand and system-friendly flexibility from EVs, data centres, batteries and heat pumps.

2. Assessment of the proposed policy options by the European Commission for the revision of the Energy Security Framework

In evaluating the four policy options presented by the European Commission, CAN Europe emphasizes the necessity of aligning energy security strategies with the EU's climate objectives and the imperative to reduce fossil fuel dependence.

Policy Option 1: "Smart Streamlining": While CAN Europe acknowledges the potential benefits of streamlining processes to enhance efficiency, we caution against simplification that may lead to deregulation. The risk lies in weakening essential safeguards that ensure resilience, transparency, and adherence to climate commitments. Streamlining should not come at the expense of robust planning, infrastructure standards, and market transparency, particularly concerning gas markets. Therefore, any efforts to simplify procedures must be carefully balanced with the need to maintain stringent regulations that support a transition to the EU's climate objectives and a renewables based and fossil-free energy system.

Policy Option 2: Targeted Reinforcement: This option is commendable for addressing emerging risks such as cyber threats, climate-induced disruptions, and infrastructure vulnerabilities. However, CAN Europe expresses concern that without explicit provisions to phase out fossil fuels and including a meaningful measure of gas demand reduction (Regulation 2022/1369), there is a danger of reinforcing existing fossil-based infrastructures and solutions. To align with the EU's climate goals, this approach must prioritize energy savings measures, renewable energy sources, and decentralized

flexibility solutions. Only by doing so, the EU ensures that its Energy Security framework advances a sustainable and resilient energy system.

Policy Option 3: Cross-Sectoral Transformation (Preferred Option): CAN Europe strongly supports this option as it offers the most integrated approach to energy security. By encompassing electricity, storage, renewables, and demand-side management, it facilitates a holistic, system-wide transition to a 100% renewable energy system. This comprehensive approach aligns with CAN Europe's vision of climate neutrality by 2040 and addresses the multifaceted challenges of energy security in the context of climate change.

Policy Option 4: EU-Driven Action: Centralized governance under this option could enhance enforcement and foster solidarity among Member States. However, CAN Europe cautions that such centralization may be too top down and must not lead to the creation of new fossil import dependencies or undermine national efforts to transition to renewable energy sources. The EU must ensure that its actions do not inadvertently lock in fossil fuel infrastructures but instead promote investments in energy efficiency, renewable energy, and decentralized solutions. This approach should be designed to complement national strategies and support the overarching goal of a fossil-free energy system.

Key points

The revision of the EU Energy Security Framework must be an opportunity to end the fossil fuel era of insecurity and volatility and to build a resilient, affordable, and climate-aligned energy system. CAN Europe urges the European Commission to:

- Make **cross-sectoral transformation (Option 3)** the centrepiece of the revision, strengthened by an integrated, demand side focused, and efficiency-first approach;
- Explicitly embed fossil fuel phase-out, **permanent energy savings measures, methane reduction, and infrastructure decommissioning into the framework**;
- Ensure that **"streamlining" does not become deregulation**, and that transparency, monitoring, and climate obligations remain fully in place.

Only by putting renewables, efficiency, flexibility, and solidarity at the heart of energy security can the EU truly protect its citizens, industry, and economy from future crises, also in times of uncertainty.

Previous contributions made by CAN Europe: Call for evidence (November 2024), *Climate proof recommendations for the revision of the security of supply framework* (February 2025).

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