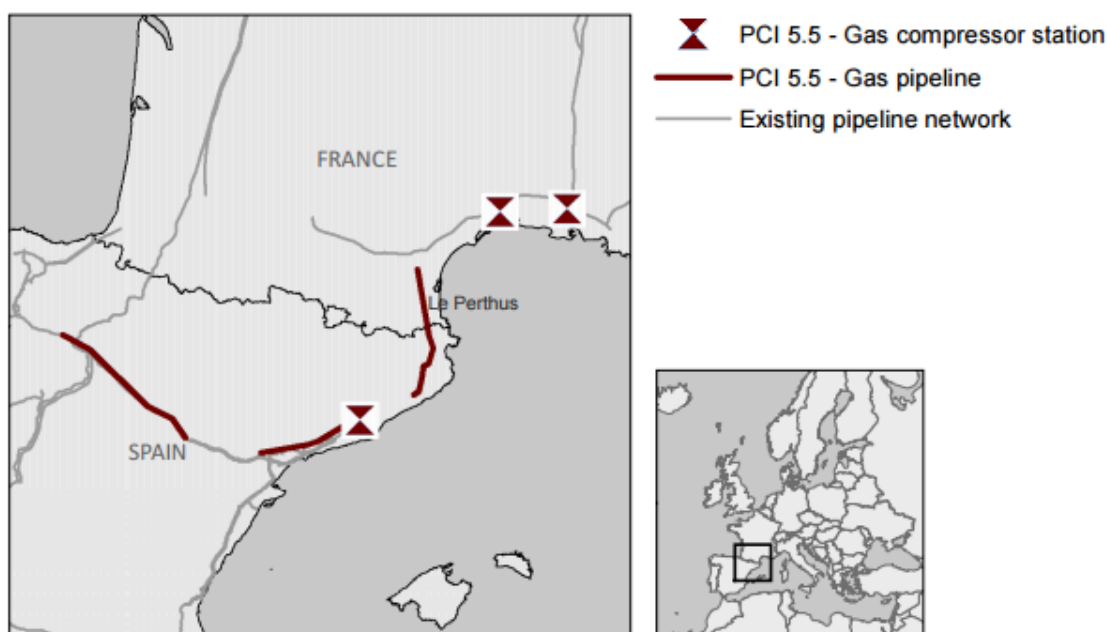


Gasoducto MidCat¹

Inicialmente, este gasoducto comprendía un tramo desde Hostalric hasta Le Perthus aunque en su última revisión se han incorporado dos tramos más sin ninguna información adicional. También incluye tres estaciones de compresión. Su capacidad es de 230GWh² (7,1 bcm).

Se justifica su construcción porque está llamado a disminuir la dependencia europea de gas ruso ya que tendría la capacidad de vehicular gas de diferentes exportadores, principalmente países del Norte de África³.

FIGURA 1 TRAZADO MIDCAT



Fuente: Ficha de proyecto MidCat.

El gasoducto está planeado, pero aún no existen los permisos para ejecutar la obra. Ha recibido 4.150.000 € a través de CEF para la ingeniería y diseño inicial de la parte francesa y 1.477.125 € para estudios de ingeniería de la parte española. Los estudios de ingeniería y diseño inicial para la parte española se esperan en Q2/2019⁴.

¹ https://ec.europa.eu/energy/sites/ener/files/documents/pci_5_5_en_2015.pdf

² El informe de "El gas en España 2015" de SEDIGAS arroja un consumo total de gas en el Estado de 26,9bcm. Es decir el MidCat podría vehicular un 27% del gas que consume España.

³ En particular, Argelia, que es el máximo suministrador para el Estado español. Aunque también se podrá aprovechar la enorme capacidad de importación del Puerto de Barcelona, donde llegan metaneros de Qatar, Nigeria, Argelia y Trinidad y Tobago.

⁴ https://ec.europa.eu/energy/sites/ener/files/documents/pci_annex2_5_5_en_2015.pdf

ALEGACIONES MIDCAT

- 1) El trazado del MidCat ha sido modificado sin ampliar la información y sin justificarlo. El tramo inicial de Hostalric a Le Perthus se mantiene, pero se han añadido dos tramos: uno desde el centro-este de Catalunya a el sud-oeste y otro que cruza longitudinalmente la Comunidad Autónoma de Aragón. En el actual listado de proyectos de interés común aparece el gasoducto STEP que parece responder al recorrido original del MidCat, pero tampoco se ha justificado la razón e interés de este cambio.

En el listado de los proyectos de gas también aparece el proyecto NSI West TRA-N-727 Iberian-French corridor: Eastern Axis - Midcat Project

http://www.enagas.es/enagas/en/MarcoRegulatorio/Proyectos_Interes_Comun El vínculo asociado lleva a una página de Enagas sobre PIC con información obsoleta de los candidatos del año 2015. La pestaña de selección de la página lleva a dos proyectos: Proyecto MidCat (TRA-N-161), 3ª Interconexión España-Portugal (TRA-N-168). Al estar asociados a una página con información obsoleta y al no tener ninguna fecha de actualización, no se puede verificar si la información de los proyectos también es obsoleta. Además, en el listado de gas disponible en el web para las contribuciones sobre PIC, el código TRA-N-161 corresponde a:

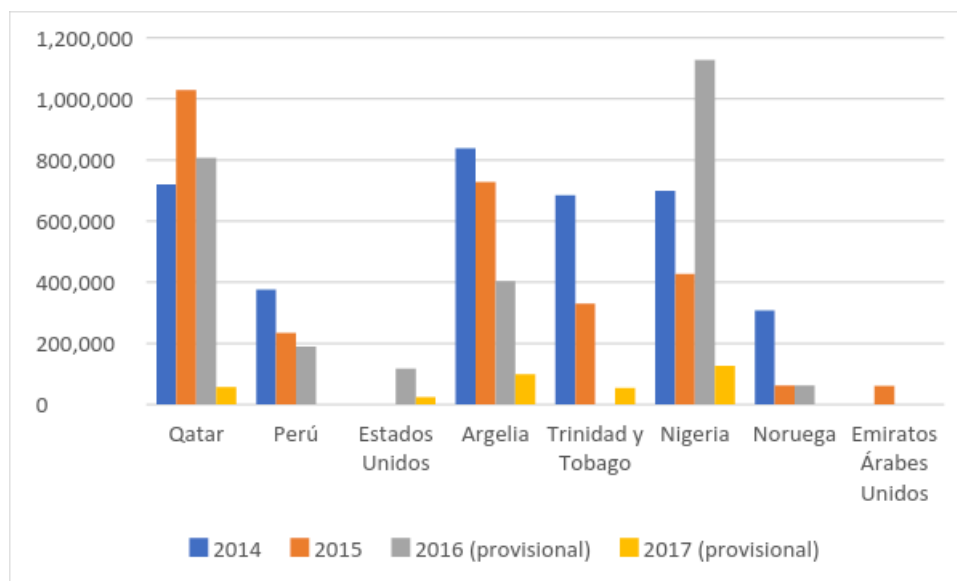
NSI West TRA-N-161 South Transit East Pyrenees (STEP) - ENAGAS Enagas ES
http://www.enagas.es/enagas/en/Transporte_de_gas/Proyecto_sYUltimasInfraestructuras

En el listado también podemos encontrar el proyecto con el código NSI West TRA-N-727 Iberian-French corridor: Eastern Axis - Midcat Project Enagás S.A.U. ES
http://www.enagas.es/enagas/en/Transporte_de_gas/Proyecto_sYUltimasInfraestructuras

pero que apunta a otra información. De hecho, esta información es del proyecto NSI West TRA-N-161 South Transit East Pyrenees (STEP) - ENAGAS Enagas ES

- 2) No existe una evaluación del impacto climático que supone la interconexión gasística que, según los datos disponibles, podría vehicular 7,1 bcm de gas natural hacia las redes francesas. Tal y como está configurado actualmente el MidCat sus principales puntos de abastecimiento parecen ser el Puerto de Barcelona y el gas proveniente de Argelia a través de los gasoductos Medgaz y Magreb-Europa.

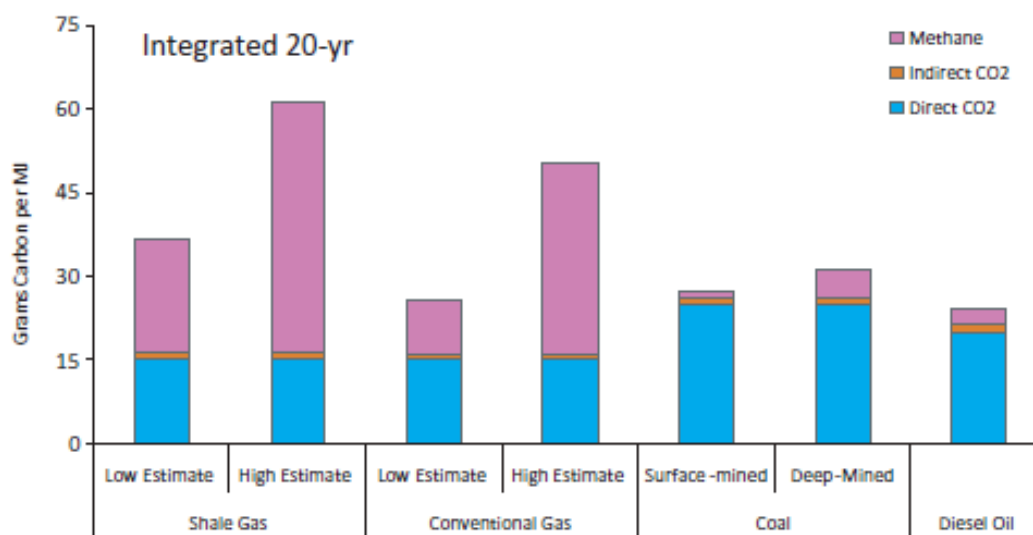
[REF. 1 IMPORTACIONES DE GNL DEL PUERTO DE BARCELONA (TONELADAS)]



Fuente: elaboración propia a partir de datos de DataComex

Tanto para el recorrido de más de 1.000km de gas por gasoducto como por su llegada por barco, no existen estimaciones de las fugas de metano que se producen en toda la cadena de suministro. Las pérdidas en la extracción, operaciones de licuefacción, regasificación y compresión y almacenamiento, tránsitos marítimos de los metaneros, pruebas de puesta en marcha⁵ y en los incidentes y accidentes, deben ser analizadas con detalle y rigurosidad para este tipo de infraestructuras que estimulan el uso de gas natural. El gas natural es metano en un 90% y éste tiene un potencial de calentamiento global 86 veces superior al CO₂ en sus primeros 20 años.

[REF. 2 COMPARATIVA DE EMISIONES ENTRE COMBUSTIBLES FÓSILES CONTABILIZANDO EL METANO]



Fuente:

www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf

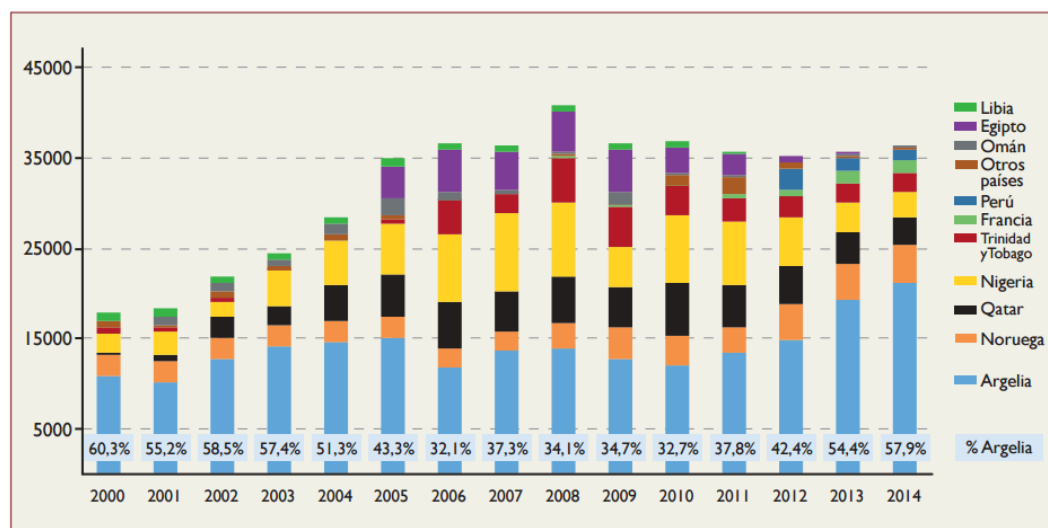
⁵ La American Petroleum Institute (API) realizó uno de los pocos estudios públicos y accesibles que valora y cuantifica las pérdidas de metano de las diferentes operaciones de suministro de gas. www.api.org/~media/Files/EHS/climate-change/api-lng-ghg-emissions-guidelines-05-2015.pdf

El reputado científico Robert Howarth de la Cornell University en los EE.UU. ha realizado numerosos estudios sobre las fugas de metano en la utilización de gas natural convencional y no convencional. El resultado de sus investigaciones es que, si se consideran las fugas de metano y su potencial climático, en los 20 primeros años las cifras que arroja el gas natural son, para la extracción convencional, equiparables al carbón y al diesel. Para la extracción no convencional, las emisiones ascienden muy por encima de las del carbón, siendo este hecho realmente alarmante.

Por otro lado, las descargas por accidente también son una realidad del suministro de gas natural. En 2015, un barco metanero sufrió un accidente atracando en el Puerto de Barcelona y derramó parte de su carga de GNL. Aunque la cantidad de GNL demarrado no ha sido publicada hay que tener en cuenta que la carga total eran 138.000 m³ de GNL que equivalen a 4.870.000 de toneladas de CO₂.

- 3) El proyecto MidCat perpetúa un modelo de importación de gas que ha generado conflictos socioambientales en los países exportadores, como es el caso de Argelia. En el año 2015 se abrió la posibilidad de extraer gas no convencional en la zona de Ain Salah, en el Sahara Argelino, hecho que provocó protestas en diferentes poblaciones (Ain Salah, Ourgla, Tamanrasset) motivadas por la defensa de los escasos recursos hídricos del territorio⁶. Siendo Argelia el mayor exportador al Estado español y teniendo las infraestructuras necesarias para exportar gas como son los gasoductos MedGaz y Magreb, y las plantas de licuefacción de Arzew y Skikda, que permiten cargar barcos de GNL para las 7 plantas de regasificación españolas.

[REF. 3 IMPORTACIONES DE GAS (MILLONES DE M³) Y PORCENTAJE DE GAS ARGELINO.]



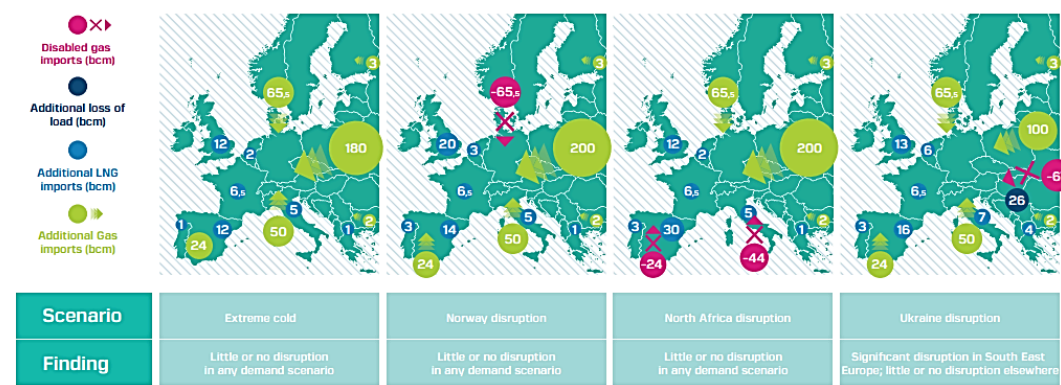
Elaboración propia a partir de datos de Eurostat

El MidCat es un estímulo presente y futuro para la exportación de gas argelino y esto representa dos grandes problemas: el agotamiento de varios de sus reservorios hace que el

gas de exportación compita con el de consumo doméstico y, por otro lado, obliga a la búsqueda de nuevas reservas y reabre el conflicto de la explotación de gas no convencional.

- 4) En 2016 E3G (*Third Generation Environmentalists*) realizó un estudio sobre las diferentes infraestructuras de gas propuestas que se proponen bajo el supuesto que son necesarias para la seguridad energética de la UE. El informe concluyo que el actual sistema gasístico europeo es altamente resiliente a las disruptions de suministro y a un amplio rango de demanda futura, y solamente requeriría una inversión limitada en el Sur-Este europeo y bajo unas circunstancias concretas.

[REF. 4 ESCENARIOS DE SEGURIDAD ENERGÉTICA PARA GAS EN LA UE]



Fuente: E3G www.e3g.org/docs/Energy_Union_Choices.pdf

- 5) El gasoducto ha recibido 4.150.000 € a través de CEF para la ingeniería y diseño inicial de la parte francesa y 1.477.125 € para estudios de ingeniería de la parte española. Estos estudios han sido financiados por dinero público, pero no son accesibles, hecho que facilitaría el trabajo para contribuciones más precisas en el periodo de contribuciones.
- 6) La construcción de la primera parte del gasoducto entre las localidades de Martorell y Hostalric en 2011 y 2012 fue denunciada en diversas ocasiones por sus deficiencias de planificación y ejecución.

[REF. 5 IMAGEN DEL TRAMO DE COLOBRERS, (CASTELLAR DEL VALLÈS, CATALUNYA) DONDE SE APRECIA LA FRANJA DE UNOS 30 METROS EN UNA ZONA BOSCOSA (AUTOR: FRANCESC MACIÀ)]



Las críticas se dirigieron, por ejemplo, al hecho que la empresa constructora, ENAGAS, no había contemplado los torrentes de 50 y 60 metros de altura del río Ripoll que supuestamente el gasoducto debía cruzar. También se denunció el exceso de la franja de trabajo (en algunos puntos de más de 30 metros) y los vertidos incontrolados de tierras y trocos en los márgenes de los pasos de torrentes y rieras, que se realizaban al margen de la declaración de impacto ambiental⁷. La construcción afectó las pocas zonas boscosas y naturales que quedan en el Vallès como el Bosc de Can Deu, el río Ripoll, el Torrent de Colobrers, el río Tort y los bosques de Can Vilar, con miles de árboles cortados y con la pérdida de gran parte del sotobosque afectado.

Una vez acabada la obra, la restauración y la revegetación se realizó sin ningún mantenimiento posterior, pese a que ello formaba parte de las obligaciones de ENAGAS incluidas en el Proyecto de Restauración Mediambiental⁸. La mayoría de árboles y arbustos plantados han muerto. La vegetación visible en el trazado existe gracias a la regeneración natural del ecosistema. Cabe mencionar que parte de la revegetación se realizó con espinos negro (*Rhamnus lycioides*) una planta arbustiva no autóctona de la comarca del Vallès.

- 7) La construcción del segundo tramo, desde la población catalana de Hostalric hasta la frontera francesa cruza el territorio de la provincia de Girona. No se conoce el trazado final del proyecto, aunque los estudios encargados a través de CEF de la parte española son para la estación compresora de Martorell y para el gasoducto entre Figueres y la frontera francesa, lo que hace pensar que el trazado entre Hostalric y Figueres será el propuesto en el proyecto de 2011, según el cual los municipios afectados serían: Sant Celoni, Fogars de la Selva, Hostalric, Sant Feliu de Buixalleu, Maçanet de la Selva, Sils, Riudellots de la Selva, Aiguaviva, Bescanó, Salt, Sant Gregori, Palol de Revardit, Cornellà de Terri, Vilademuls,

⁷ http://territori.scot.cat/cat/notices/2012/03/gasoducte_martorell_figueres_3086.php

⁸ BOE 216, de 6 de setembre de 2010

Pontós, Borrassà y Avinyonet de Puigventós.

El paso por la provincia de Girona es altamente controvertido por la enorme cantidad de infraestructuras que pasan por su territorio: la Autopista AP-7, el tren de Alta Velocidad y una línea de muy alta tensión (MAT). Ésta última fue considerada PIC en su tramo entre Santa Llogaia y Baixas. La MAT fue uno de los episodios de oposición ciudadana más importantes que se recuerdan en Girona el cual culminó con una manifestación el 30 de marzo de 2008 con la asistencia de 15.000 personas⁹, una de las mayores registradas en la ciudad de Girona hasta ese momento. La percepción de la población local era que la MAT era una infraestructura impuesta y que no respondía a las necesidades del territorio, además de suponer una amenaza para la salud de las personas por la radiación electromagnética, dado el incumplimiento de la legislación estatal y catalana por lo que respecta a distancias de seguridad a masías y núcleos de población habitados. Los procesos de participación pública fueron insuficientes o inexistentes y la oposición se generalizó en los diferentes municipios de paso de la MAT. En la actualidad, seis activistas se enfrentan a una condena de entre 2 y 7 años de cárcel por una acción de desobediencia civil contra la MAT¹⁰, sumando un total de 36 años de prisión 28.836€ de multas, así como los costes de los procesos administrativos y judiciales que han recaído sobre las asociaciones que se opusieron al proyecto.

El MidCat, por tanto, tiene una significación similar a la de la MAT. Por este motivo se ha organizado un grupo denominado Plataforma Resposta al MidCat que se opone al gasoducto por su impacto ambiental y climático, por ser innecesario para el territorio y por anclar la necesaria y urgente transición energética a la dependencia de un combustible fósil como el gas natural. La Plataforma conformada por numerosas organizaciones sociales y ecologistas, por grupos universitarios y partidos políticos de ambos lados de los Pirineos, advierten de la gran cantidad de espacios de interés paisajístico y natural de la zona de paso del gasoducto¹¹. El trazado que se preveé en el proyecto 2011 incluye espacios de alto valor natural y paisajístico incluidos en la legislación estatal y autonómica, así como directivas europeas: espacios incluidos en el PEIN, Red Natura 2000 y espacios incluidos en el Catàleg d'Espais d'Interès Natural i Paisatgístic de les comarques gironines. La región tiene una urografia irregular, por lo que salvar los desniveles será complicado y se prevén impactos y complicaciones como sucedió en la construcción del primer tramo. Se trata de una zona con un alto porcentaje de población rural que vive del paisaje y la explotación sostenible de los recursos naturales (agricultura, ramadería, silvicultura...) por lo que se prevén importantes impactos económicos, además de los ambientales y paisajísticos ya citados, algunos de los cuales como la pérdida o afectación sobre bosques maduros o la pérdida de biodiversidad o hábitats, no podrán ser revertidos bajo ningún proceso de restauración. Además, la Plataforma advierte del elevado número de infraestructuras que transitan por su territorio y de su propuesta alternativa para un nuevo modelo energético basado en la recuperación de la soberanía energética por parte de los municipios.

- 8) El gas natural retrasa la necesaria y urgente transición energética hacia las energías renovables. Los presupuestos necesarios para la proyección, estudio y construcción del

⁹ <http://www.revoltaglobal.cat/spip.php?article1523>

¹⁰

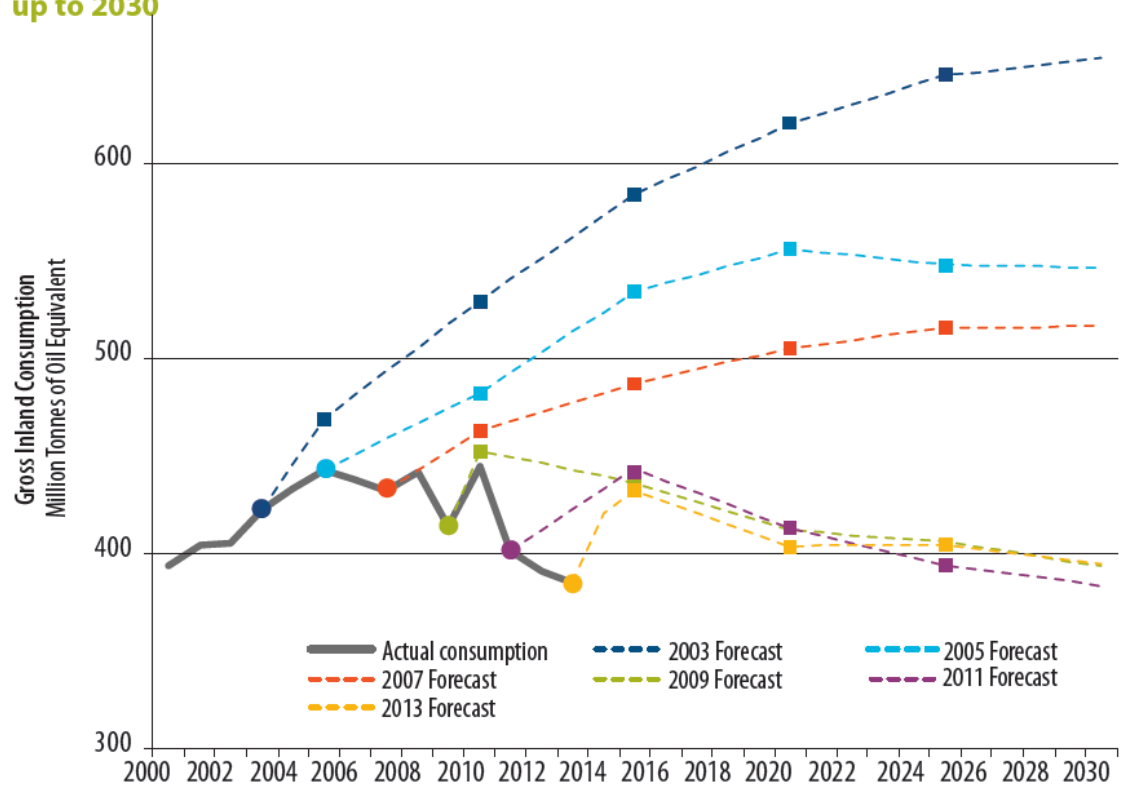
<http://www.lavanguardia.com/local/girona/20170131/413886046483/piden-anos-carcel-anti-mat-enteraron-coche.html>

¹¹ <http://www.ddgi.cat/mediambient/docs/memoriacat.pdf>

modelo gasístico desplazan las inversiones para la eficiencia energética y el modelo renovable y perpetúan un régimen fósil basado en las importaciones de hidrocarburos. En un contexto europeo donde la demanda de gas ha caído en los últimos años, se siguen haciendo proyecciones de consumo intencionadamente optimistas que estimulan al sector del gas.

[REF. 6 PROYECCIONES “OPTIMISTAS” DE CONSUMO EN LA UE]

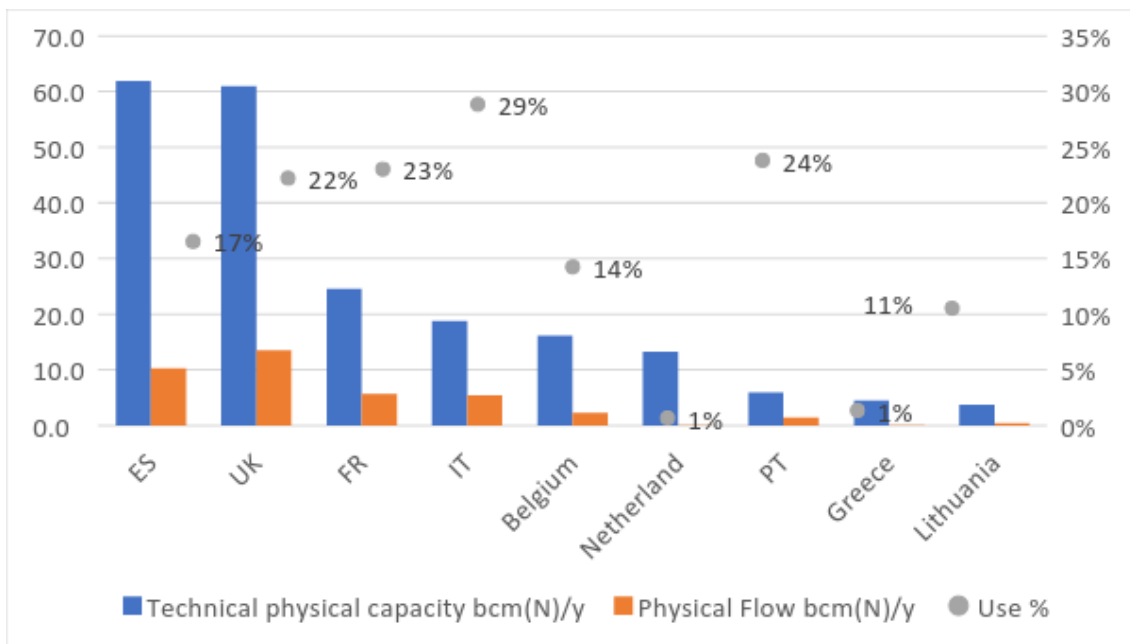
Gas consumption in EU-27 2000-2013 shown alongside the Commission forecasts up to 2030



Fuente: (European Court of Auditors, 2015)

El descenso de la demanda de gas, lejos de verse como una oportunidad para emprender acciones que actúen sobre la demanda (eficiencia energética, por ejemplo), impulsa propuestas que estimulen el consumo a través de la consolidación del modelo gasístico y de unas infraestructuras sobredimensionadas.

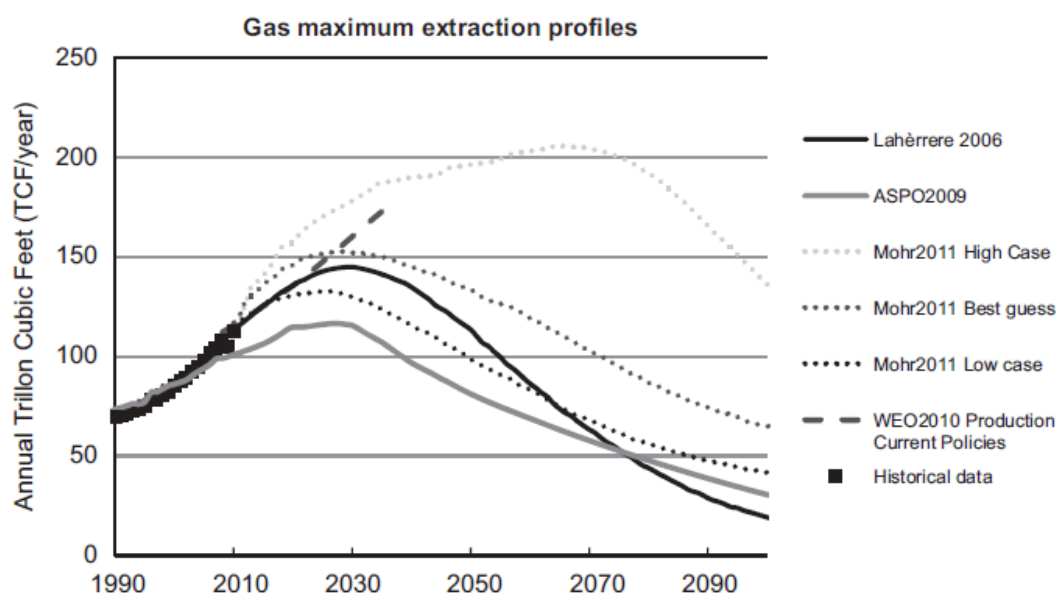
[REF. 7 CAPACIDAD Y USO DE LAS TERMINALES DE IMPORTACIÓN DE GAS POR PAÍS EN 2015]



Elaboración propia a partir de datos de *ENTSOG / GIE*¹²

Por otro lado, los argumentos de seguridad energética y de diversificación del gran proveedor ruso, han conllevado soluciones de gas por gas, es decir, con el propósito de disminuir las importaciones de gas ruso debemos importar gas de otros países, a saber, Azerbaiyán, Turkmenistán, Argelia, Israel, etc. Entonces, se diversifica la dependencia estableciendo relaciones gasísticas con otros países y se acentúa la dependencia de un combustible fósil que en los próximos años llegará a su pico de extracción y que, tras este, provocará serias tensiones en los territorios de extracción y problemas de suministro a los países dependientes.

[REF. 8 RESUMEN DE CURVAS DE MÁXIMA EXTRACCIÓN DE GAS (TCF/AÑO)]



Fuente: *The transition towards renewable energies: Physical limits and temporal conditions*

¹² ENTSOG/GIE (2016) <https://transparency.entsog.eu/#/?loadBalancingZones=false>

(Mediavilla, y otros, 2012)

Frente a esto, la diversificación para reducir la dependencia debería focalizar sus esfuerzos en substituir las importaciones de gas por, en primer lugar, medidas de eficiencia energética y, en segundo lugar, en la producción distribuida con energías renovables.

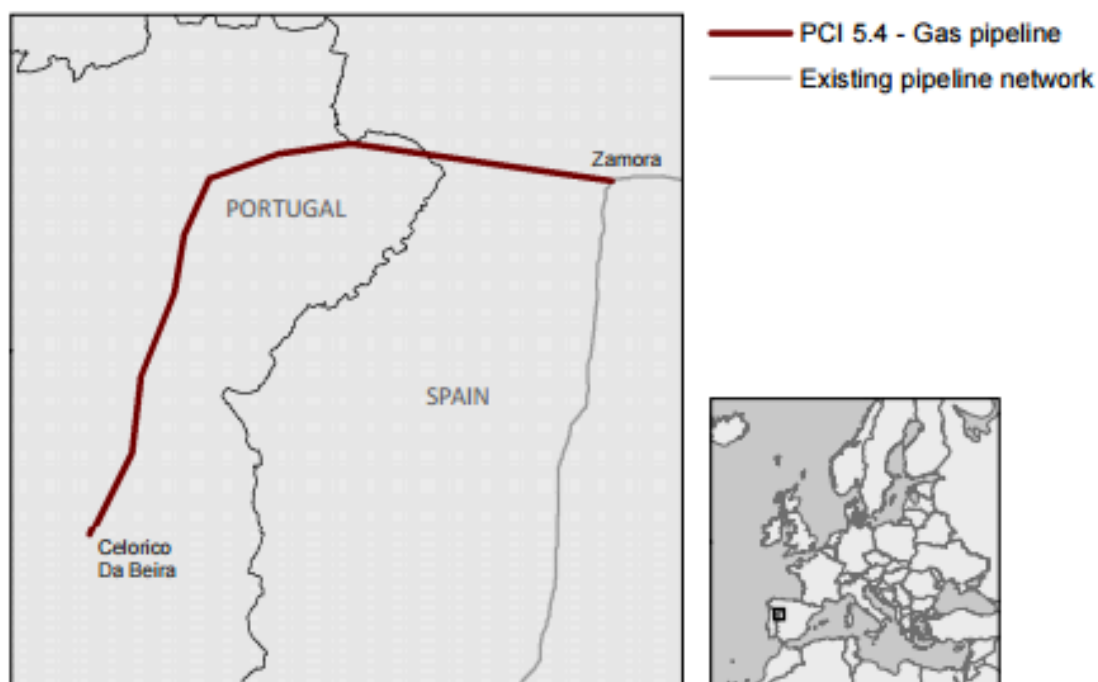
PROYECTOS ASOCIADOS AL MIDCAT EN EL LISTADO DE PROYECTOS PIC DE GAS

Fila del documento Excel para contribuciones	Proyecto
14	NSI West TRA-N-727 Iberian-French corridor: Eastern Axis - Midcat Project Enagás S.A. ES http://www.enagas.es/enagas/en/MarcoRegulatorio/Proyectos_Interes_Comun
25	NSI West TRA-N-161 South Transit East Pyrenees (STEP) - ENAGAS Enagas ES http://www.enagas.es/enagas/en/Transporte_de_gas/ProyectosUltimasInfraestructuras
26	NSI West TRA-N-252 South Transit East Pyrenees (STEP) - TIGF TIGF FR https://www.tigf.fr/qui-sommes-nous/nosmissions/perspectives-de-developpement.html
27	NSI West TRA-N-256 Iberian-French corridor: Eastern Axis-Midcat Project Grtgaz and TIGF FR http://www.grtgaz.com/en/
28	NSI West TRA-N-727 Iberian-French corridor: Eastern Axis - Midcat Project Enagás Transporte, S.A.U. ES http://www.enagas.es/enagas/en/Transporte_de_gas/ProyectosUltimasInfraestructuras

3ª interconexión entre España y Portugal¹³

Gasoducto de 324km de longitud (229 km en Portugal y 85 km en España) de capacidad bidireccional de 142GWh (4,4 bcm). En 2015 recibió 505.925 € del CEF para estudios básicos de ingeniería y diseño. Este proyecto no ha recibido tanto apoyo político como el MidCat y su justificación principal es el refuerzo de los niveles de interconexión.

Figura 2 Tercera interconexión España-Portugal



Fuente: Ficha de proyecto MidCat.

¹³ https://ec.europa.eu/energy/sites/ener/files/documents/pci_5_5_en_2015.pdf

ALEGACIONES

- 1) La información accesible desde la lista de proyectos de interés común tiene dos vínculos principales para el gasoducto:

NSI West TRA-N-168 Interconnection ES-PT (3rd IP) Enagás S.A. ES
http://www.enagas.es/enagas/en/MarcoRegulatorio/Proyectos_Interes_Comun

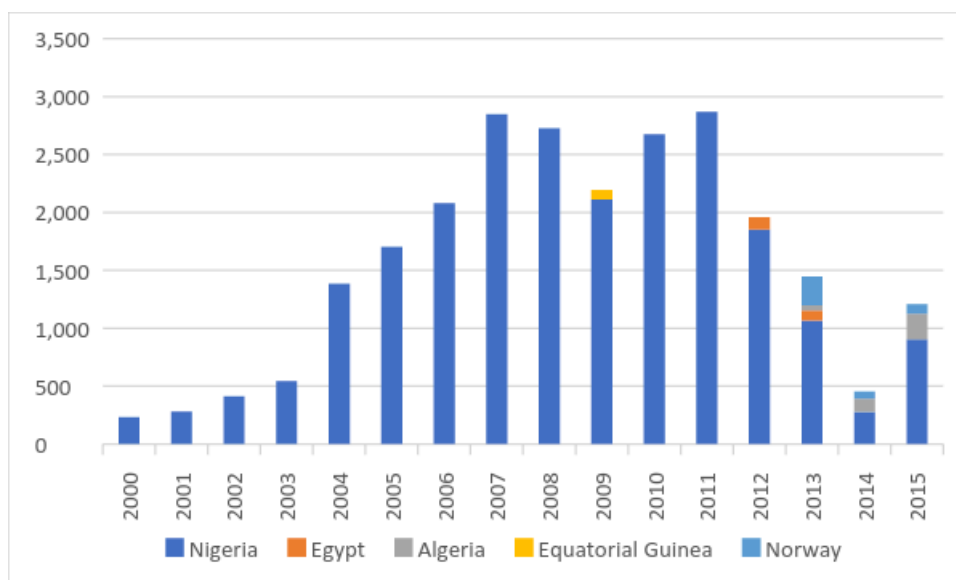
NSI West TRA-N-729 Interconnection ES-PT (3rd IP) - 2nd phase Enagás Transporte, S.A.U. ES
http://www.enagas.es/enagas/en/Transporte_de_gas/ProyectosUltimasInfraestructuras

El primer vínculo lleva a una página de Enagas sobre PIC con información obsoleta de los candidatos del año 2015. La pestaña de selección de la página lleva a dos proyectos: Proyecto MidCat (TRA-N-161), 3ª Interconexión España-Portugal (TRA-N-168). Al estar asociados a una página con información obsoleta y al no tener ninguna fecha de actualización, no se puede verificar si la información de los proyectos también es obsoleta

El segundo vínculo lleva a la información sobre el proyecto STEP que nada tiene que ver con la interconexión España-Portugal.

- 2) El gasoducto, por el recorrido que se traza en su ficha de proyecto, conectaría las redes portuguesas con las españolas, con el ánimo de que el Estado español pueda acceder a las importaciones de GNL portugués. Actualmente Portugal importa GNL principalmente de Nigeria, aunque ha incorporado a Argelia y Noruega recientemente.

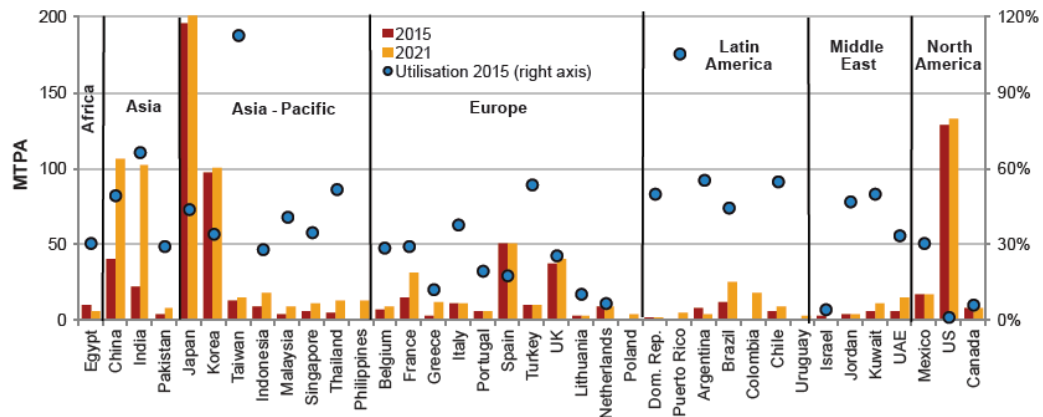
[REF. 9 IMPORTACIONES DE GAS NATURAL DE PORTUGAL (MILLONES DE METROS CÚBICOS)]



Elaboración propia a partir de datos de Eurostat

El uso de sus regasificadores en 2015 estaba por debajo del 20% y su utilización en los últimos años no ha llegado al 50%.

[REF. 10 CAPACIDAD DE IMPORTACIÓN DE LAS TERMINALES DE REGASIFICACIÓN Y RATIO DE USO]

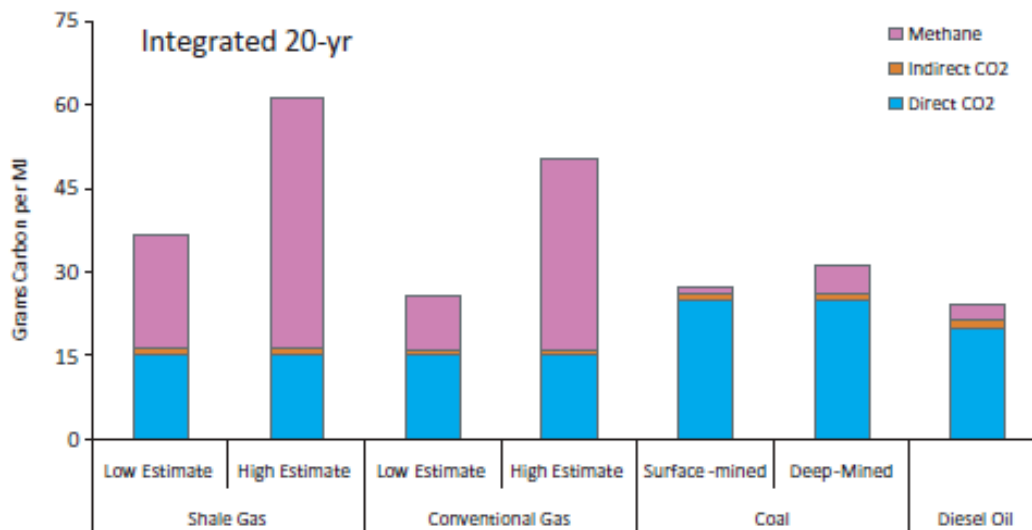


Al estar situadas en la costa del Atlántica, pueden ser la puerta de entrada del gas de esquisto de los EE.UU. por su bajo precio y sus condiciones contractuales favorables. La terminal de exportación de Sabine Pass ya ha servido los primeros cargos a la Unión Europea. No existe una evaluación de impacto climático de lo que esto podría suponer.

Las pérdidas en la extracción, operaciones de licuefacción, regasificación y compresión y almacenamiento, tránsitos marítimos de los metaneros, pruebas de puesta en marcha¹⁴ y en los incidentes y accidentes, deben ser analizadas con detalle y rigurosidad para este tipo de infraestructuras que estimulan el uso de gas natural. El gas natural es metano en un 90% y éste tiene un potencial de calentamiento global 86 veces superior al CO₂ en sus primeros 20 años.

[REF. 11 COMPARATIVA DE EMISIONES ENTRE COMBUSTIBLES FÓSILES CONTABILIZANDO EL METANO]

¹⁴ La American Petroleum Institute (API) realizó uno de los pocos estudios públicos y accesibles que valora y cuantifica las pérdidas de metano de las diferentes operaciones de suministro de gas. www.api.org/~media/Files/EHS/climate-change/api-Ing-ghg-emissions-guidelines-05-2015.pdf



Fuente:

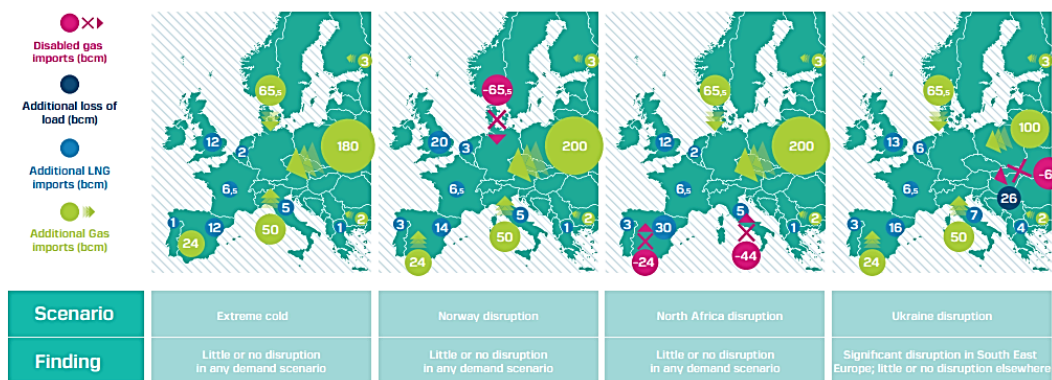
www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf

El reputado científico Robert Howarth de la Cornell University en los EE.UU. ha realizado numerosos estudios sobre las fugas de metano en la utilización de gas natural convencional y no convencional. El resultado de sus investigaciones es que, si se consideran las fugas de metano y su potencial climático, en los 20 primeros años las cifras que arroja el gas natural son, para la extracción convencional, equiparables al carbón y al diesel. Para la extracción no convencional, las emisiones ascienden muy por encima de las del carbón, siendo este hecho realmente alarmante.

Por otro lado, las descargas por accidente también son una realidad del suministro de gas natural. En 2015, un barco metanero sufrió un accidente atracando en el Puerto de Barcelona y derramó parte de su carga de GNL. Aunque la cantidad de GNL derramado no ha sido publicada hay que tener en cuenta que la carga total eran 138.000 m³ de GNL que equivalen a 4.870.000 de toneladas de CO₂.

- 3) En 2016 E3G (Third Generation Environmentalists) realizó un estudio sobre las diferentes infraestructuras de gas propuestas que se proponen bajo el supuesto que son necesarias para la seguridad energética de la UE. El informe concluyó que el actual sistema gasístico europeo es altamente resiliente a las interrupciones de suministro y a un amplio rango de demanda futura, y solamente requeriría una inversión limitada en el Sur-Este europeo y bajo unas circunstancias concretas.

[REF. 12 ESCENARIOS DE SEGURIDAD ENERGÉTICA PARA GAS EN LA UE]

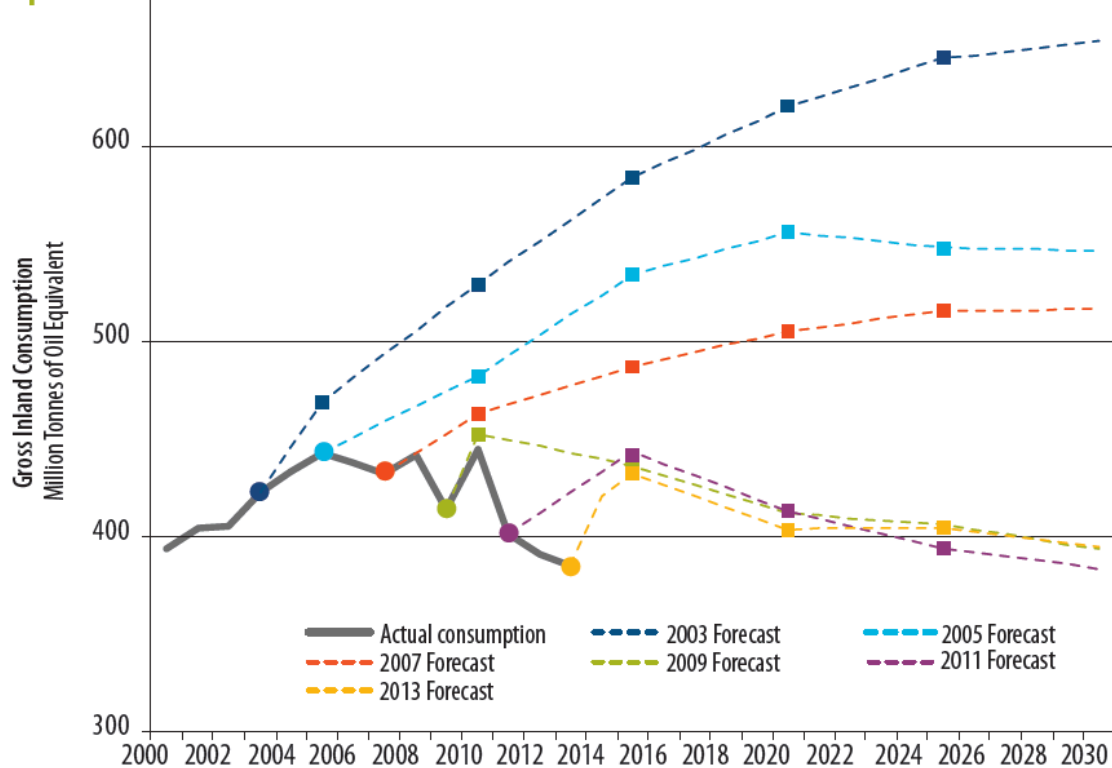


Fuente: E3G www.e3g.org/docs/Energy_Union_Choices.pdf

- 4) El gas natural retrasa la necesaria y urgente transición energética hacia las energías renovables. Los presupuestos necesarios para la proyección, estudio y construcción del modelo gasístico desplazan las inversiones para la eficiencia energética y el modelo renovable y perpetúan un régimen fósil basado en las importaciones de hidrocarburos. En un contexto europeo donde la demanda de gas ha caído en los últimos años, se siguen haciendo proyecciones de consumo intencionadamente optimistas que estimulan al sector del gas.

[REF. 13 PROYECCIONES “OPTIMISTAS” DE CONSUMO EN LA UE]

Gas consumption in EU-27 2000-2013 shown alongside the Commission forecasts up to 2030

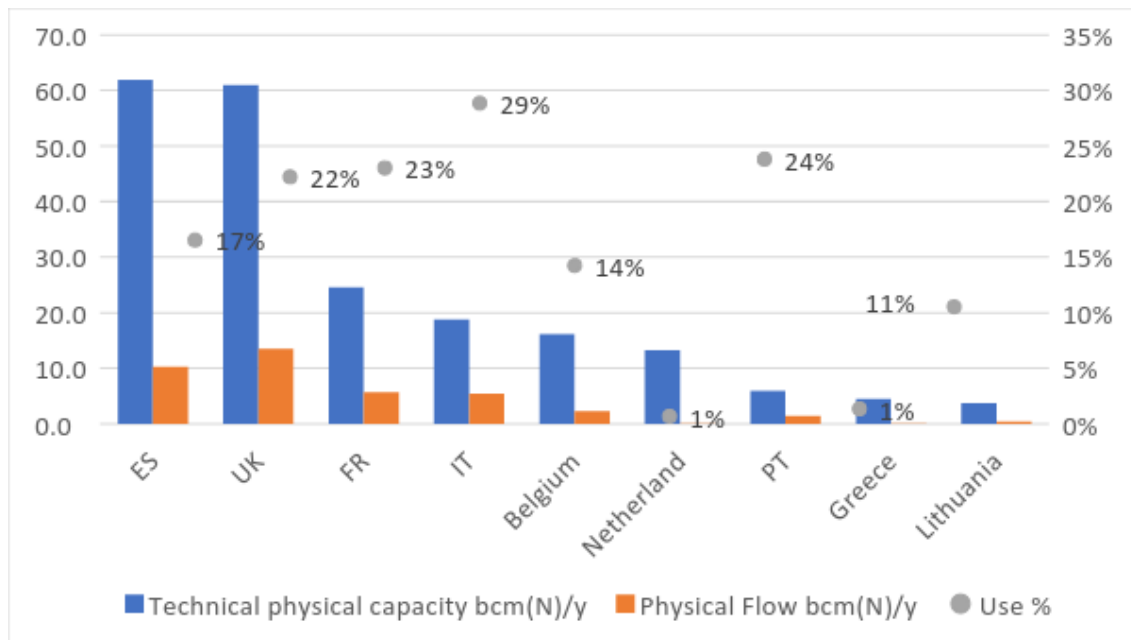


Fuente: (European Court of Auditors, 2015)

El descenso de la demanda de gas, lejos de verse como una oportunidad para emprender acciones que actúen sobre la demanda (eficiencia energética, por ejemplo), impulsa

propuestas que estimulen el consumo a través de la consolidación del modelo gasístico y de unas infraestructuras sobredimensionadas.

[REF. 14 CAPACIDAD Y USO DE LAS TERMINALES DE IMPORTACIÓN DE GAS POR PAÍS EN 2015]

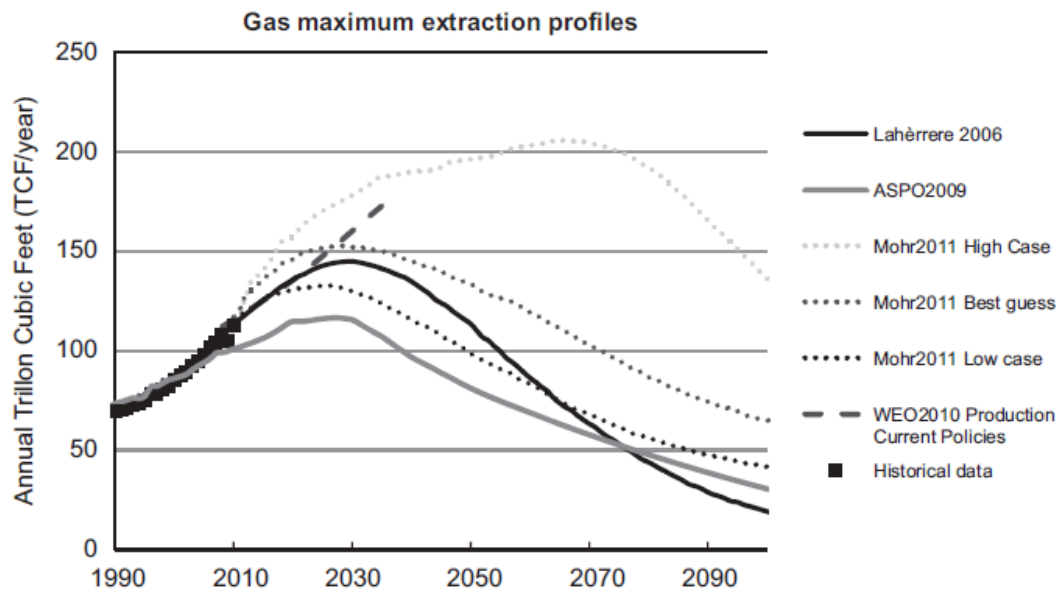


Elaboración propia a partir de datos de **ENTSOG / GIE**¹⁵

Por otro lado, los argumentos de seguridad energética y de diversificación del gran proveedor ruso, han conllevado soluciones de gas por gas, es decir, con el propósito de disminuir las importaciones de gas ruso debemos importar gas de otros países, a saber, Azerbaiyán, Turkmenistán, Argelia, Israel, etc. Entonces, se diversifica la dependencia estableciendo relaciones gasísticas con otros países y se acentúa la dependencia de un combustible fósil que en los próximos años llegará a su pico de extracción y que, tras este, provocará serias tensiones en los territorios de extracción y problemas de suministro a los países dependientes.

[REF. 15 RESUMEN DE CURVAS DE MÁXIMA EXTRACCIÓN DE GAS (TCF/AÑO)]

¹⁵ **ENTSOG/GIE** (2016) <https://transparency.entsog.eu/#/?loadBalancingZones=false>



Fuente: *The transition towards renewable energies: Physical limits and temporal conditions* (Mediavilla, y otros, 2012)

Frente a esto, la diversificación para reducir la dependencia debería focalizar sus esfuerzos en substituir las importaciones de gas por, en primer lugar, medidas de eficiencia energética y, en segundo lugar, en la producción distribuida con energías renovables.

PROYECTOS ASOCIADOS A LA 3A INTERCONEXIÓN ESPAÑA-PORTUGAL EN EL LISTADO DE PROYECTOS PIC DE GAS PIC

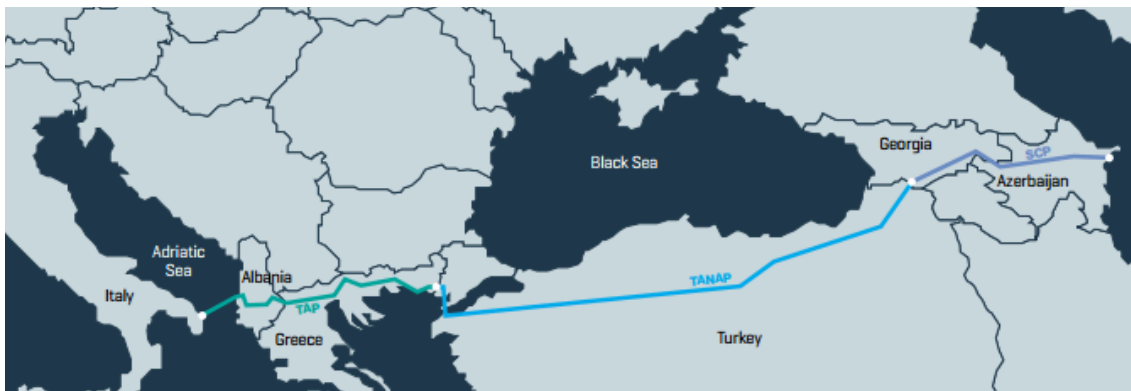
Fila del documento Excel para contribuciones	Proyecto
15	NSI West TRA-N-168 Interconnection ES-PT (3rd IP) Enagás S.A. ES http://www.enagas.es/enagas/en/MarcoRegulatorio/Proyectos_Interes_Comun
19	NSI West TRA-N-729 Interconnection ES-PT (3rd IP) - 2nd phase Enagás Transporte, S.A.U. ES http://www.enagas.es/enagas/en/Transporte_de_gas/ProyectosYUltimasInfraestructuras
16	NSI West TRA-N-283 PT-ES Interconnector (3rd IP) Pipeline Spanish Border-Celorico REN - Gasodutos, S.A. PT http://www.ren.pt/o_que_fazemos/projetos_interesse_2015/
17	NSI West TRA-N-284 PT-ES Interconnector (3rd IP) Cantanhede Compressor Station REN - Gasodutos, S.A. PT http://www.ren.pt/o_que_fazemos/projetos_interesse_2015/
18	NSI West TRA-N-285 PT-ES Interconnector (3rd IP) Pipeline Cantanhede-Mangualde REN - Gasodutos, S.A. PT http://www.ren.pt/o_que_fazemos/projetos_interesse_2015/

Southern Gas Corridor

(trabajo hecho a través de la coalición Counter Balance)

The Southern Gas Corridor (SGC) is a mega pipeline project connecting Europe to Italy, often presented as Europe's energy flagship project.

It is divided into several sections which are all under consideration under this 3rd PCI list and/or already received funding under the Connecting Europe Facility: Trans-Adriatic Pipeline (TAP - https://ec.europa.eu/energy/sites/ener/files/documents/pci_7_1_3_en_2015.pdf), the Trans-Anatolian Pipeline (TANAP), the South Caucasus Pipeline Future Expansion (SCPFX) and the Trans-Caspian Pipeline (TCP) – all described in this EC document: https://ec.europa.eu/energy/sites/ener/files/documents/pci_7_1_1_en_2015.pdf.



Portrayed as being crucial for the EU's energy security, it is meant to contribute to decrease Europe's dependence on Russian gas and diversify its gas supplies by tapping into gas from Azerbaijan, and in the longer term from Turkmenistan and potentially Central Asia and Iran for example. Nevertheless, there are numerous doubts about its real impact on the EU's energy security. Indeed, the SGC is highly unlikely to ensure energy security and might in fact end up channelling Russian gas:

- With a 10 bcm/y capacity, its impact on overall EU gas demand (433 bcm in 2015) will be only marginal. Its import capacity equals only to 2.5% of European gas consumption. The economics of the projects also look dubious at this stage. The cost of the project is evaluated at around \$45bn (<https://www.tap-ag.com/the-pipeline/the-big-picture/southern-gas-corridor>), with unprecedentedly high financial support coming from the EU funds and from the EU public banks. Indeed, the EIB is considering a EUR 2bn loan for TAP and EUR 1bn loan for TANAP, which would be the largest set of loans contracted for a single project in the EU's bank history. In parallel, the EBRD is considering a 1,5 bn loan for both pipelines.

This goes without mentioning the need for transit countries to provide guarantees or counter-guarantees for the project. Given the budgetary situation of countries like Italy, Greece, Turkey, Azerbaijan or Albania, a real burden may fall on the shoulders of the citizens of those countries.

- In front of the European Parliament to present the "Second report on the State of the Energy Union", the Commission's vice-president Sefcovic insisted on his determination to foster "the transition to a more modern, low carbon economy" with the "ambition to move away from an economy dependent on fossil fuels". This should be materialised, he argued, through the

development of essential infrastructure which would be supported “only if in line with the long-term energy policy of the European Union, avoiding stranded assets and carbon lock-in”. But this is hard to see how the Southern Gas Corridor can fit in this picture:

Risk of stranded assets due to declining gas demand: the decrease of European gas demand – even according to the Commission’s own figures – questions the need for building additional gas infrastructure, a finding that has been underlined in the study “Energy Union Choices” of E3G, the European Climate Foundation and WWF published in February 2016 (http://www.energyunionchoices.eu/wp-content/uploads/2016/07/EUC_Report_Web.pdf). The study stresses that: *“Under normal market conditions, Europe does not need any new import capacities into Europe or cross-border gas infrastructure between Member States to secure supplies.”*

In addition, a recent study of the Oxford Institute for Energy Studies showed that the future of the pipeline does not look too bright (<https://www.oxfordenergy.org/publications/azerbaijans-gas-supply-squeeze-consequences-southern-corridor/>). Specifically, the gas supply available at the Azeri field for the SGC until 2030 is considerably smaller compared to previous forecasts. This would mean that Azerbaijan would not be able to deliver the expected quantity of gas to the pipeline. Hence, even in economic terms, the feasibility of the project looks shakier than ever and the SGC is likely to become a stranded asset.

Climate impact: Furthermore, the planned increase of gas import capacities ignores the EU’s greenhouse gas emissions reduction targets and the urgent need to phase out the use of fossil fuels in Europe. It also undermines the Paris Agreement ambition to limit global warming to 1.5°C and to align financial flows accordingly. Given the disastrous and often underestimated climate impact of gas, especially due to methane emissions (http://www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf), expanding unneeded gas infrastructure clearly undermines necessary climate action. In fact, the Commission, which often prides itself for leading the global effort to tackle the climate crisis, has recently admitted that no assessment has been done for the climate impact of the project (<http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2016-007932&language=EN>).

- With Gazprom now considering this pipeline project to bring even more Russian gas to Europe (<http://www.naturalgasworld.com/gazprom-eyes-tap-for-russian-gas-35548> & <http://www.euractiv.com/section/energy/news/eu-gets-wake-up-call-as-gazprom-eyes-rival-tap-pipeline/>), the diversification argument would be acutely weakened. A first red flag arrived when in October 2016 Russia and Turkey signed an agreement on the so called “Turkish Stream” and many foresaw Gazprom’s intention to connect this new pipeline to the SGC. Indeed, while expected to bring more Russian gas to Turkey through the Black Sea, the Turkish Stream’s placement appears quite strategic: the last section of the pipeline would run up to Ipsala, just opposite the town of Kipoi, across the Greek border, where the Trans Anatolian Pipeline (TANAP) and Trans Adriatic Pipeline (TAP) – the two main sections of the SGC – are planned to connect. Gazprom itself confirmed the experts’ guess, when its deputy chairman Alexander Medvedev officially announced the possibility to channel their gas through TAP on the occasion of a conference in Vienna in January 2017. Thus TAP combined with the Turkish Stream could be just the piece of infrastructure that was missing in order to secure an extra delivery of Russian gas to south-east Europe, as further validated by the words of Michele Mario Elia, TAP’s country manager for Italy, in an interview for RAI3’s Report on Italian TV.

Ironically, the SGC has been primarily promoted as a strategy to emancipate the EU's gas supply from Russia and improve "energy security".

- The EU's support for SGC is contradictory to its goals and principles on human rights since it directly supports and further legitimises the Azeri regime, which has been and continues to be in breach of its international human rights commitments. The autocratic Azeri regime does not provide more political security than the authoritarian one in Russia, especially due to its dismal human rights track record.

This has been, inter alia, recognised by a decision to suspend Azerbaijan's membership in the Extractive Industries Transparency Initiative (EITI) adopted on 9 March 2017. In 2015, the EITI board downgraded Azerbaijan's membership status due to its relentless crackdown on civil society, political opponents and journalists in the country, and in its October 2016 meeting board members decided to give Baku another chance to comply with international standards (<https://www.ft.com/content/dee61e6c-9b5e-11e6-8f9b-70e3cabccfae>). In February 2017, an international group of 22 civil society organisations including Human Rights Watch, Reporters Without Borders and Bankwatch, has written to EITI board members, urging them to suspend Azerbaijan's membership in the EITI (see the letter here: <https://www.hrw.org/news/2017/03/02/joint-letter-eiti-board-members>). In an open letter published in January 2017, jailed Azerbaijani opposition politician Ilgar Mammadov warned European governments, as well as potential financiers of the Southern Gas Corridor, about engagement with Azerbaijan's rulers (<https://www.opendemocracy.net/od-russia/ilgar-mammadov/open-letter-from-inmate-of-southern-gas-corridor>). His "letter from an inmate of the Southern Gas Corridor" stated that *"International investment in fossil fuel extraction is making me and other Azerbaijani political prisoners hostages to the Aliyev regime."* The EITI board's decision is the latest confirmation that Azerbaijani fossil fuels export projects like the SGC only fuel the autocratic regime in Baku as it intensifies its repression of civil society and media in the country. The European Commission should recall its commitment to human rights and acknowledge the EITI board's decision in order to disengage from the project.

- In addition, the construction of the Trans Adriatic Pipeline and Trans Anatolian Pipeline is contributing to human rights abuses in other transit countries such as Turkey, Greece and Albania. Some of those have been documented in a webdocumentary (<http://globalmotion.pageflow.io/walkingtheline>) and various field reports (<http://stories.bankwatch.org/albanian-farmers-fear-last-harvest-along-pipeline-route> & <http://stories.bankwatch.org/when-athens-cant-tell-a-trojan-horse>). Dozens of complaints have been lodged to the European Investment Bank in relation to land expropriation and poor compensation for affected communities in those countries. The EU should not turn a blind eye to such blatant human rights violations but stand by its objectives of protecting democracy, human rights and the rule of law.

- Corruption and integrity issues: Several companies involved with the Southern gas corridor are connected to important corruption scandals and relate to Politically Exposed Persons. We refer here to the report from CEE Bankwatch Network on the sub-contractors of TAP-TANAP (<http://www.counter-balance.org/turkish-gas-companies-with-corrupt-past-get-world-bank-loan/>) and a recent investigation of the Italian media L'Espresso (<http://espresso.repubblica.it/inchieste/2017/04/18/news/the-pipeline-of-the-three-regimes-1.299786>). In this context, we call on the European Commission to exert thorough due diligence on who have been and will be the real beneficiaries of EU's political and financial support.

As a conclusion, we consider that this project does not contribute to EU objectives and values, especially in terms of human rights and the fight against climate change, and therefore none of its sections should be considered as a project of common interest (PCI) for the European Union.

ALEGACIONES

Fila 100 excel para contribuciones

TRA-F-051 Trans Adriatic Pipeline

As a key section of the Southern Gas Corridor, the TAP should not be considered as a PCI project for the reasons expressed in this consultation paper.

In addition to above-mentioned elements, please find below some additional issues related to the Trans-Adriatic Pipeline which have been in particular documented in this joint NGO report (<http://www.counter-balance.org/trans-adriatic-pipeline-a-major-risk-for-banks-warns-new-analysis/>):

TAP construction formally started in May 2016. The TAP company is working to a timetable which foresees TAP operations commencing in 2020 (<https://www.tap-ag.com/the-pipeline/project-timeline/tap-project-milestones>), although work on the project's Italian section is stalled and behind schedule due to opposition from both residents in the town of Melendugno and surrounding towns in the province of Lecce, and local and regional authorities. In April 2017 a popular movement with thousands of people, including women, elderly and children, blocked the explanting of the first 231 olive trees – which leaves operations in Italy still at „phase zero“ of construction. Construction work is moving forward both in Albania, where there is widespread dissatisfaction among stakeholders owing to a flawed compensation and land acquisition process conducted by the TAP company, and in Greece, despite protests and resistance from communities and farmers in the north-east of the country related to the pipeline's routing through both highly fertile agricultural land and seismic areas close to residences. Below are more details about the currently pending issues at national level:

- Over the last few years, TAP has aroused controversy in Albania, Greece and Italy to varying degrees. However, as pre-construction and construction processes have escalated over the last 18 months and involved/provoked a range of problematic issues, conflicts and criticisms of the project have intensified in all three countries. The fact that at least 15 complaints – ten from Albania, two from Greece and three from Italy – about the project have been submitted to the EIB from members of the public and associations bears this out. This is a notably high number of complaints provoked by a project which is still only being considered for finance by the EIB. It reflects stakeholder dissatisfaction with the TAP company's management of the project, including its external relations with the public. It may also be indicative of a lack of confidence in the TAP company in the respective countries – significantly, the EIB has already become a last resort contact point for affected stakeholders.

- Albania

The TAP investment has been welcomed by authorities at all levels in the least developed of the three transit countries, particularly as it runs through some of Europe's most impoverished rural areas. The Albanian ESIA was approved by the Ministry of Environment, Forests and Water Administration in April 2013, followed by official granting of the Environmental Permit.

Villages along the TAP route are dotted with scores of olive trees, orchards, pastures and fields providing subsistence for local inhabitants. Two fact-finding missions carried out in 2016 by NGOs (July: 32 villages visited -

<http://bankwatch.org/sites/default/files/no-other-option-TAP-FFM-Albania.pdf>; August: 30+ villages visited - See 'Last harvest looming for Albanian farmers along pipeline route' based on joint fact-finding mission conducted by the Albanian Helsinki Committee and CEE Bankwatch Network, available at: <http://stories.bankwatch.org/albanian-farmers-fear-last-harvest-along-pipeline-route>) unearthed extensive community discontent concerning involuntary resettlement, compensation for loss of land and property, damage to property (during the construction of a TAP access road) and the engagement methods being used by TAP's Albanian contractor ABKons.

TAP established the involuntary resettlement process, and compensation outcomes under its Land Easement and Acquisition (LEA) process are based solely on the company's assessment. The set of notably open-ended principles to which TAP is committed for LEA and compensation (applicable to all the transit countries) includes the blunt contingency option "Expropriation and compulsory easement to be used if attempts at reaching an agreement fail" (see 'Land easement and acquisition explained' at: <https://www.tap-ag.com/land-access>). The TAP grievance mechanism in Albania is barely known about or registering with affected people, while there is almost universal scepticism about the Albanian legal system's fitness to provide an alternative means for seeking redress.

Although collective resistance to TAP in Albania is much less marked than in Greece and Italy, the above-mentioned report of CEE Bankwatch Network reported that: "Farmers in the village of Cangonj, about eight kilometres from the border with Greece, have decided to fight back. They have organised and sent a letter to the management of TAP in Switzerland protesting the plan to build the pipeline through their plum plantations. No less than 120 people had signed the letter, *but more than six months later they still got no response* [emphasis added]."

In response to the above-mentioned report, which contains a set of recommendations for public and private investors aimed at rectifying the compensation, LEA and grievance gaps and abuses uncovered in Albania, the EBRD notified NGOs in September 2016 that its environmental and social specialists would be undertaking site visits to affected areas in order to speak with affected communities. It is not known if these EBRD visits have taken place.

- Greece

The TAP company has been engaging with stakeholders in Greece since 2008, and one comment, cited in the Greek ESIA documentation, capturing stakeholder sentiment is instructive: "A general scepticism regarding proper management of compensation issues and impact mitigation was expressed" (see 'TAP's Environmental and Social Impact Assessment (ESIA) process in Greece' at: <https://www.tap-ag.com/our-commitment/to-the-environment/esia-greece>). Public rallies and organised resistance to TAP in north-east Greece duly sprang up in 2011-2012 as concerns grew during the project's contested ESIA process.

In September 2014, Greece's Ministry of Environment, Energy and Climate Change formally approved TAP Greece's ESIA, a decision challenged by farmers and citizen committees concentrated in the Eastern Macedonia and Thrace region through which the pipeline is planned to operate. The installation permit, formally allowing the commencement of construction work, was granted by the same ministry in June 2016 (<http://www.naturalgaseurope.com/tap-gets-green-light-in-greece-30022>). These procedural hurdles may have been cleared by the TAP company, but discontent about the project was not

and has not been quelled in the region. Following the ESIA approval in 2014, more than 400 people residing in the prefecture of Serres together with the municipal authorities of Serres and Emmanouil Pappa lodged challenges to the ministry decision at Greece's Supreme Court. Similar challenges have been lodged by the municipalities of Kavala and Doxato. At issue is the routing of the pipeline section Kavala-Serres-Thessaloniki, 113 kilometres in length, which would disrupt fertile agricultural land and present threats to various villages, and the location of a compressor station in the Serres plain.

Supreme Court judgments on the cases brought have been heavily delayed. The latest postponement, announced on February 2 this year, is the ninth so far, with a new date now set for May 5. This prolonged delay at the Supreme Court is viewed by people in the region as excessive and abnormal, leading to fears that judgments may only arrive after the pipeline is constructed.

In August 2015, a farmers' group, the Agricultural Association of Kavala, alerted the EIB to a range of problematic issues including inappropriate consultation methods deployed by TAP, instances of threats and malfeasance connected with land acquisition and concerns over safety and security issues for villages located less than a kilometre from the TAP route. They allege that in the Kavala area, rich in agricultural land, TAP has been unable to buy or rent 70% of the land required by the project – approximately 200 farmers are unwilling to settle terms with the company. Stand-offs between the company and farmers have resulted in police interventions, with farmers confronting TAP workers who have arrived on their land without permits or consent, according to the farmers. In October 2016, after various delays, an EIB delegation finally travelled to meet and discuss separately with the Agricultural Association of Kavala and a citizens' movement in Serres which is opposed to the current TAP routing. The outcomes of this visit are unknown.

Also in October, and with TAP construction work under way, an NGO mission (<http://stories.bankwatch.org/when-athens-cant-tell-a-trojan-horse>) to the Kavala province visited two locations where explicit land violations had recently been carried out by the JP Avax company, a TAP sub-contractor. One of the violations, on private land close to the village of Libra, resulted in damage to the land by bulldozers which had entered without informing or consulting with the landowner, a local farmer, who subsequently pressed charges against the company. Another violation in September 2016 in the village of Lachanas (Thessaloniki prefecture) saw a landowner requesting police intervention to stop work by the TAP sub-contractors Bonatti-JP Avax on his land; however, after the landowner and the police departed the scene, the company proceeded to damage the land.

Into 2017, and the mayor of the municipality of Nea Zichni (in the prefecture of Serres) brought a case in January against Bonatti-JP Avax in a local court due to damage caused to public roads. The mayor of Doxato, near Kavala, has also taken action to stop the closure of a road by Bonatti-JP Avax after the sub-contractors damaged the local water mains, cut an electricity line and were preparing to enter municipality property without permission.

TAP's ESIA for Greece declares that "Agreements on land purchase and easement rights will be made well in advance of construction start."

- Italy

By far the shortest TAP section, the project's proposed eight kilometres, along with the construction of a Pipeline Receiving Terminal (PRT), in the province of Lecce, south-east Italy, is proving to be the most contentious by some distance. The level of disruption and potentially harmful impacts that TAP would bring directly to the touristic and olive-growing town of Melendugno and to the wider Puglia region has been challenged for several years now by local communities and the municipal and regional authorities. Two hundred or so families, local

fisheries, approximately 10,000 olive trees and a burgeoning local tourism sector are directly affected by the project proposal. TAP opponents are calling for the pipeline's construction to be stopped and question the wider benefits which the promoters claim it would deliver. The president of the Puglia region is calling for the pipeline to land further up the coast at Brindisi, where it would be able to connect directly to the gas network and project impacts could be minimised.

At the consultation stage for the Italian ESIA, the municipality of Melendugno established a Technical Commission comprised of engineers, biologists, geologists, economists and academics. The Commission's view was that the preliminary project documentation was both inaccurate and lacking in numerous aspects. Substantial revisions to the ESIA were subsequently made by the TAP company. The Melendugno municipality and the Puglia region both issued negative opinions of the revised ESIA. Under Italian law, the Ministry of Environment cannot refuse to approve a project's submitted environmental assessment, and in September 2014 the environment minister approved the TAP Italy ESIA. At the same time, however, the ministry attached 58 mandatory provisions for TAP to fulfil before the beginning of construction.

This level of mandatory provisions for a single project is unusually high, and the Ministry of Cultural Heritage and Activities and Tourism also insisted on the fulfilment of a further six provisions. The TAP company is understood to have so far provided documentation adequate to fulfilling only three of the mandatory provisions and is said to be seeking final authorisation to proceed on the basis of fulfilling the missing provisions *only during its implementation of the project*.

In spite of objections from local and regional authorities, the Italian government granted the project a 'special decree' authorisation in May 2015, permitting the commencement of construction by May 2016 if the necessary provisions were fulfilled. The Puglia regional authorities are legally challenging this authorisation, asserting that a comprehensive, fit for purpose executive project, which would provide the basis for comprehending fully how TAP will be implemented, is currently not available for due scrutiny and dialogue. The temporary removal of economically and culturally vital olive trees, one of the most acute project tensions, continues to be highly contested – the regional authorities point out that there is no permit for the operation, and the project stands to be beset by further delays if the sensitive removal operation does not take place before the legal time window for doing so closes on April 30, re-opening again only in November 2017.

The original TAP ESIA documentation noted that "olives are the most important crop in the area with 81.1% of land in Melendugno ... used to cultivate olives for olive oil production." From the outset, TAP's determination to proceed with its preferred routing in Italy thus involved steep challenges, albeit in a highly focused, proposed zone of operations. However, as evidenced by the strength of opposition from local people and various authorities, TAP has so far not been able to convince that it can adequately and responsibly meet these challenges.

As a consequence, as of early 2017, TAP construction has not commenced due to ongoing legal processes. In April 2017, the re-plantation of olive trees has been strongly opposed by local citizens, as documented by numerous national and international media. The presence of the police, sent to protect the operations of the company by the national government, faced a massive popular resistance, with thousands of people non-violently blocking the vehicles of TAP subcontractor. In the first line, the mayors of Melendugno and neighboring towns. In April 2017, 94 mayors have signed an appeal to the President of the Italian Republic to stop the operations and reopen a consultation with the local institutions (<http://www.lecceprima.it/cronaca/no-tap-presidio-3-aprile-firme-82-sindaci-salento.html>).

Conclusion:

As a result of its harmful environmental, social and climate impacts, further construction and realisation of the TAP project would be a major setback both for the communities affected by the project and Europe's energy future, bearing in mind the resulting 'carbon lock-in' which the project would bring about. In this context, neither TAP nor any of its related infrastructure (Compressor station at Nea Messimvria, Infrastructure gas pipeline Skopje - Tetovo - Gostivar - Albanian border, Metering and Regulating station at Nea Messimvria) should be granted the PCI status.

Fila 103 excel para contribuciones

TRA-N-339 Trans-Caspian

As a section of the Southern Gas Corridor, the TCP should not be considered as a PCI project for the reasons expressed in the consultation paper.

In addition to above-mentioned elements, please find below some additional issues related to the Trans-Caspian Pipeline:

Based on the mandate given by the Council of the European Union to the European Commission in 2011, the Commission is to negotiate on behalf of the EU a bilateral energy agreement with Azerbaijan and Turkmenistan as concerns the proposed Trans-Caspian gas pipeline. But those negotiations seem to have reached a deadlock, since an agreement has not been found in 5 years. In that context, and pending new developments on that front, the PCI status should not be granted to the TCP. In addition, it is important to note that there has not been any Financial Investment Decision (FID) signed so far for this project.

Fila 104 excel para contribuciones

TRA-N-941 Metering and Regulating station at Nea Messimvria

As being directly related to the TAP project (TRA-F-051 Trans Adriatic Pipeline), this project should not be granted PCI status. In addition, it is important to note that there has not been any Financial Investment Decision (FID) signed so far for this project.

Fila 105 excel para contribuciones

TRA-N-971 Compressor station at Nea Messimvria

As being directly related to the TAP project (TRA-F-051 Trans Adriatic Pipeline), this project should not be granted PCI status. In addition, it is important to note that there has not been any Financial Investment Decision (FID) signed so far for this project.

Fila 106 excel para contribuciones

TRA-N-007 Development for new import from the South (Adriatica Line)

Also called the "TAP Interconnection", this 55km pipeline is directly connected to the TAP project (TRA-F-051 Trans Adriatic Pipeline). Hence, it should not be granted PCI status. In addition, it is important to note that there has not been any Financial Investment Decision (FID) signed so far for this project. Finally, this project is not part of the new Ten Years Network

Development Plan (TYNDP) which is a basic requirement to be eligible for PCI status.

Fila 107 excel para contribuciones

TRA-N-128 Compressor Station Kipi

As being directly related to the TAP project (TRA-F-051 Trans Adriatic Pipeline), this project should not be granted PCI status. In addition, media reports showed the possibility for Russian Gas to be channeled via this compressor Station, since the Turkish Stream would be connected to it. Hence, this project would also fail in delivering increased energy security for the EU.

Fila 108 excel para contribuciones

TRA-N-1129 Compressor Station Kipi Increment

As being directly related to the TAP project (TRA-F-051 Trans Adriatic Pipeline), this project should not be granted PCI status. In addition, media reports showed the possibility for Russian Gas to be channeled via this compressor Station, since the Turkish Stream would be connected to it. Hence, this project would also fail in delivering increased energy security for the EU.

Fila 102 excel para contribuciones

TRA-N-1138 SCPFEX (South Caucasus Pipeline Future Expansion)

As a central part of the Southern Gas Corridor, the expansion of the South Caucasus Pipeline should not be granted PCI status. There is also an uncertainty about where the extra gas supplies to be channeled through the pipeline will come from, apart from the initial 16 bcm to be channeled through TANAP. In addition, it is important to note that there has not been any Financial Investment Decision (FID) signed so far for this project.

Fila 101 excel para contribuciones

TRA-F-221 TANAP

See the above comments on the Southern Gas Corridor.

A report from the NGO CEE Bankwatch Network (<http://bankwatch.org/risky-business>), as well as an article published by the Guardian (<https://www.theguardian.com/global-development/2016/dec/16/europe-development-banks-plan-5bn-backing-for-gas-project-with-mafia-links-bankwatch-report>) reveal that the construction of the project involves no less than 15 companies who have a history of corruption. Top executives in Turkey's state-owned energy firm, BOTAS, orchestrating the construction of the TANAP project, have been convicted for corruption in two major corruption scandals, alongside government officials and officials of some of the subcontractors for the TANAP project. The Turkish Supreme Court later overturned the rulings, clearing most of the defendants, but much of the evidence remains in the public domain. This raises the question of whether the EU should prioritise such project, especially in the current political context in Turkey.

At a time when Turkey's academics, journalists, human rights activists and so many others are arrested with impunity while the country is under martial law, it has been impossible for civil society to engage in public comment on this 1800+ km long pipeline, especially regarding the crucial issue of forced resettlement. In a context in which martial law is in place and civil

society's freedom to monitor the project and voice concerns is so restricted, it is important to note that still the TANAP consortium had received in August 2016 nearly 600 complaints filed by communities that could be, or already are, affected by the project.