

Dan Jørgensen

Commissioner for Energy
European Commission
Rue de la Loi 200
1049 Brussels, Belgium

3 December 2024

Subject: Urgent Call to Phase Out Russian Gas Imports and Strengthen European Energy Security and Decarbonization in Partnership with Ukraine

Dear Commissioner Jørgensen,

On behalf of a broad coalition of Ukrainian and international civil society organizations [Business4Ukraine](#), we would like to extend our congratulations on your appointment as European Commissioner for Energy and Housing. We are confident that your leadership will advance the European Union's energy transition and fortify its energy security during these critical times.

As you take office, we wish to bring to your attention an issue of utmost importance: the urgent need for the EU to completely and rapidly phase out imports of Russian gas, particularly LNG. This step is essential to curtailing the Kremlin's capacity to fund its unlawful war of aggression against Ukraine, which threatens not only our sovereignty but also European security and stability.

Members of this coalition have been researching Russian fossil fuel flows and have been instrumental in developing a greater understanding of the pervasive reach of Putin's oil and gas exports, and in developing concrete policy proposals to prevent them.

Russia's revenues from fossil fuel exports, including LNG, continue to finance its military operations, with devastating consequences for Ukraine and global security. According to the latest estimates by the Center for Research on Energy and Clean Air, Russian fossil fuel export revenues amounted to €793 billion globally and €207 billion for the EU market since the start of full-scale invasion in Ukraine.¹ A significant portion of these funds is derived from gas sales to Europe. By reducing dependency on Russian energy, the EU can decisively weaken this source

¹ <https://www.russiafossiltracker.com/>

of funding and send a clear signal of commitment to protect international law and solidarity with Ukraine.

Earlier this month, [Razom We Stand](#) published the findings of a detailed analysis of the potential climate benefits of more comprehensive sanctions on Russian oil and gas. The report found that comprehensive sanctions could lead to a 25% reduction in Russia's upstream emissions by 2030, also saving 300 million tons of CO2 annually in Europe and Asia.

We welcome the Commission's commitment to boost the implementation of the REpowerEU plan, which envisions a complete phasing out of Russian fossil fuels no later than 2027. Yet we must note with concern that recent trends regarding increasing Russian LNG imports, particularly through spot market trade, indicate gaps in the existing regulations.

Provided with sources of funding from fossil fuel exports, the Russian war machine systematically destroys the Ukrainian energy system with escalating combined missile and drone attacks. These attacks at centralized energy infrastructure target, inter alia, critical high-voltage substations, which are essential to prevent the collapse of Ukraine's grid and a potential nuclear disaster in Europe in the event of loss of offsite power at Ukraine's nuclear power plants. This puts at risk not only the nuclear safety of Ukraine but also of the European continent as a whole.

To achieve the goals set out in REpowerEU and protect Europe and Ukraine from Russia's direct and hybrid acts of aggression, we respectfully urge the European Commission to:

1. **End Russian gas imports:** Implement measures to eliminate all Russian gas imports, both through pipelines and LNG, by establishing alternative supply chains, structurally reducing gas demand and incentivizing renewable energy integration in heating systems. While working on a complete phase-out of Russian gas, it would be advisable to immediately introduce the War Tax on Russian LNG - a customs duty that would deprive Russia of profits on the European market, as well as to set a cap on the import volumes with regular downward revisions on a quarterly basis.
2. **Support Ukrainian energy resilience:** Provide direct financial and technical support for grid reinforcements, as well as to decentralized renewable energy and energy efficiency projects for Ukrainian municipalities, particularly in regions liberated from Russian occupation. We advise the European Commission to set up mechanisms for on-demand access for Ukrainian municipalities to the EU funding for the design and implementation of local energy resilience projects, such as the modernisation of local energy infrastructure and the deployment of distributed energy resources.
3. **Strengthen EU-Ukraine energy partnership:** Facilitate joint projects, including grid modernization and expansion of interconnectors with EU member states, set up frameworks for cross-border renewable energy trade, support the introduction of net-zero-energy building standards in construction, and support technology transfer and joint research into innovative energy solutions.

By phasing out Russian gas imports, boosting energy efficiency and accelerating renewable energy adoption, Europe can safeguard its energy security while demonstrating leadership in the

global fight against climate change, and building out the job-creating energy infrastructure of the future. Ukraine is ready to contribute to this shared vision as a reliable partner in building a sustainable and secure energy future for our continent.

Furthermore, we believe Europe's challenge to wean itself from gas import dependency is an opportunity to accelerate Europe's transition to economically advantageous clean and sustainable energy systems. Ukraine stands ready to be a key partner in this endeavour. Our country holds immense untapped potential for solar, wind, and other renewable energy sources, with an estimated total technical potential of over 800 GW.² Setting the stage for strategically developing this potential over the long term could help meet Europe's decarbonization targets while enhancing the country's energy resilience, supporting post-war recovery and boosting economic development.

We would welcome the opportunity to brief your staff on our coalition's research into Russian oil and gas flows and the concrete policy proposals to reduce Putin's revenues and bring about an end to the war.

Yours sincerely,

on behalf of Business4Ukraine coalition members

Eleanor Nichol, B4Ukraine

Svitlana Romanko, Razom We Stand

Sebastian Rotters, Urgewald

Victoria Voytsitska, International Center for Ukrainian Victory

CC: Anna-Kaisa Itkonen, Spokesperson of the European Commission: energy, climate, environment, housing and taxation.

² According to the Institute of Renewable Energy of the National Academy of Sciences of Ukraine