To: Office of Fossil Energy and Carbon Management U.S. Department of Energy Forrestal Building 1000 Independence Avenue, SW Washington, DC 20585

Via email: FECMcommunications@hq.doe.gov

European CSO statement responding to the DOE's 2024 LNG Export Study: 'Energy, Economic, and Environmental Assessment of U.S. LNG Exports'

Dear Madam / Sir,

US LNG exports harm the environment and communities across the full supply chain while fueling devastating global warming. No envisaged LNG export and import capacity expansion is needed on either side of the Atlantic from an energy security point of view, nor does it contribute in a positive way to economic benefits for the people and the country. Instead of being in the public interest, they serve the orgiastic profit greed of polluting companies and reckless individuals. This needs to end!

We request the current and future US DOE to deny all (pending and future) authorizations for US LNG exports and lay out further reasoning for this in our letter to you.

With reference to the letters sent by European civil society groups^[i] and parliamentarians^[ii] in January 2024, we, 78 Civil Society Groups from throughout Europe and beyond hereby send our comments on the key findings of your Energy, Economic and Environmental Assessment of US LNG exports.

- Domestic Natural Gas Supply and Economic Impacts

The Department of Energy (DOE) study clearly outlines that increasing US LNG exports are linked to higher gas and electricity prices for households and the industry in the USA. (US) LNG is also costly for EU consumers and likely has a negative impact on Europe's economy. Even extremely costly, according to the think tank Bruegel^[iii]:

"LNG is more expensive than pipeline gas because of the liquefaction and regasification costs that arise when gas is transformed into a state that can be transported by ship. ... EU consumers must pay the LNG premium, and as a result, wholesale gas prices in the EU are almost five times as high as in the US."

We remind you that increasing US LNG exports is and will remain costly for U.S. and EU consumers and industry besides its devastating other impacts – highlighting the need for a permanent stop of expanding LNG infrastructure on both sides of the Atlantic and a well-managed phase down and ultimate phase out in future LNG trade. We Europeans do not want to be complicit in a system that further harms people in LNG sacrifice zones and the related fracking areas.

- Energy Security

The DOE study rightfully points to the fact that the EU has been the primary destination for US LNG since 2016 but that, at the same time, European policies will reduce the consumption of fossil gas. We already see a significant decline in gas consumption within the EU and the UK –

with a specific impact on future LNG imports. According to the Institute for Energy Economics and Financial Analysis^[iv]:

"European demand for the fuel will drop 11.2% this year to 148 bcm, meaning the continent has likely already passed peak LNG consumption. By 2030, LNG demand is expected to fall to 93 bcm."

We want to highlight that fossil gas and LNG consumption in the EU will further decrease, making more US LNG exports into the European markets obsolete. Wasting further billions on LNG expansion and volatile gas prices channels scarce funds away from urgently needed, proven and ready-to-use solutions which can lift both blocs out of dangerous fossil gas dependency. Europe has shown in recent years how important reduction in gas demand is possible and must and will continue this path, making super-sized gas extraction and export capacities a risky investment. Future transatlantic energy security lies in energy efficiency and sufficiency as well as renewables – not in an increased US-EU-LNG trade or expansion of existing infrastructure.

- Greenhouse Gas Emissions

The study acknowledges an increase in global greenhouse gas emissions because of (increasing) US LNG exports. However, the modeling heavily relies on several Carbon Capture Storage (CCS) scenarios – even though CCS has been mostly successfully used for an increase of oil and gas production (enhanced oil recovery or EOR) and has for decades failed to successfully capture and safely store CO2.^[V] More realistic assumptions about actual CO2 capture and storage rates are needed to show the real impact of CO2 emissions caused by LNG exports.

According to a peer-reviewed study by Prof. Robert Howarth, Cornell University, the greenhouse gas footprint of US LNG is 33% worse than coal, when upstream production, processing and shipping are considered.^[vi] This is because of the high methane intensity of US fossil gas.^[vii] Further studies, e.g. a study published 2024 in 'Nature' show how methane emissions from oil and gas in the US have been underestimated previously.^[viii] The Climate Action Tracker^[ix] highlighted already in 2022, that the *"LNG capacity now under construction, coupled with expansion plans, could increase emissions … above emission levels consistent with the IEA's Net Zero by 2050 scenario."*^[x]

We warn that LNG – which in the case of U.S. LNG is almost entirely fracked gas – is at least as climate hostile as coal. Expanding US LNG export infrastructure and increasing US LNG production and trade will torpedo all necessary efforts to reduce global warming even to under 2 degrees Celsius determined by the Paris Agreement. Methane is over 100x more heat trapping than CO2 during its lifetime in the atmosphere and thus a critical molecule to target to increase our chances to avoid the most catastrophic impacts of global warming.

From 2027 onwards, the European Methane Regulation^[XI] will also apply to imports – making it much harder for methane intensive LNG to enter the EU market, which must be yet another reminder for proponents of U.S. LNG export expansion to reconsider.

- Environmental and Community Effects

The study tries to indicate that possible positive impacts might balance out the well documented disproportionate negative impacts of U.S. fossil gas.

It acknowledges that "communities of color, including those with Black, Indigenous, and Hispanic populations, as well as rural and low-income communities, have historically been disproportionately exposed to the environmental risks, harms, and measurable impacts that arise from natural gas and overall fossil fuel development and production activities" but again, says that "these same activities also provide economic support for many communities" as if this kind of income would justify the severe health, environmental or climate impacts linked to fossil gas extraction and LNG production.

The bulk of US LNG exports to Europe comes from the Gulf Coast (Texas and Louisiana). The US EIA points to the direct link between shale gas production growth in the Haynesville and Permian basins and increasing LNG exports from the Gulf Coast.^[xii]

Shale gas is being extracted via hydraulic fracturing or fracking.^[xiii] According to the Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking and Associated Gas and Oil Infrastructure: "*no evidence [has been found] that fracking can be practised in a manner that does not threaten human health directly or without imperilling climate stability upon which human health depends.*"^[xiv] It is disappointing that this fully referenced compilation of evidence is not being referenced in your study! Adding to communities heavily impacted by fracking are those impacted by LNG export facilities, which pose a serious health risk adding to other polluting industries in export locations, as well as severe security risks ^[xiii].

We once again underline that US fossil gas extraction via fracking and LNG production are linked to structural human rights violations and a significant contribution to global warming. The new European Corporate Sustainability Due Diligence Directive "*will ensure that companies in scope identify and address adverse human rights and environmental impacts of their actions inside and outside Europe.*"^[XV] We will monitor the strict implementation of this law which we expect to have further impact on the futility of U.S. LNG export expansion. In a report published by the German ministry for labor, LNG has been identified and listed as a commodity with potential human rights violations.^[XV] We will continue drawing attention to the fact that US LNG exports into the EU fuel environmental racism and climate chaos and are incompatible with existing EU regulations and climate targets and call on the DOE to uphold fundamental principles such as the protection of human rights in their future actions.

We repeat our call on the DOE to deny all pending and future authorizations to the inherently harmful, polluting, dangerous and economically unsound expansion of U.S. LNG exports. We are keen to discuss this further in a meeting in the future.

Best regards,

Andy Gheorghiu Consulting	Germany	andy gheorghiu consularing
Food & Water Action Europe	Belgium	FOOD & WATER ACTION EUROPE
Urgewald	Germany	urgewald
Deutsche Umwelthilfe	Germany	Deutsche Umwelthilfe
BankTrack	The Netherlands	BANKTRA©K
Fossielvrij NL	The Netherlands	× Fossiel Vrij NL
Razom We Stand	Ukraine	NOZVA STAND
Greenpeace European unit	Belgium	GREENPEACE
ReCommon	Italy	Contro le ingiustizie per natura
Climate Action Network (CAN) Europe	Belgium	CLIMATE ACTION NETWORK EUROPE

Ecologistas en Acción	Spain	ecologistas en acción
Friends of the Earth Europe	Belgium	Friends of the Earth Europe
Amigas de la Tierra	Spain	Amigas de la Tierra
Friends of the Earth Ireland	Ireland	Friends of the Earth Ireland
Les Amis de la Terre France	France	Les Amis de la Terre France
"Za Zemiata" - Friends of the Earth Bulgaria	Bulgaria	Za Zemiata Friends of the Earth Bulgaria
Gemeinnütziger Umweltschutzverein pro Grün Paderborn e.V.,	Germany	Cemeinnilitziger Umweltschutzverein progrün e.V. Paderborn
Berliner Wassertisch	Germany	Berliner-Wassertisch.info

Linha Vermelha	Portugal	LINHA VERMELHA
Mothers Rise Up	UK	Mothers Rise Up
Global Atlas of Environmental Justice (EJatlas.org)	Spain, Global	Sejatlas.org
Leave it in the Ground Initiative (LINGO)	Germany	
BI Lebensraum Vorpommern	Germany	81 LEBENSRAU 81
BI gegen Gasbohren in Halfing	Germany	BÜRGERINITIATIVE GEGEN GASBOHREN IN HALFING
LaKunaBi	Germany	LakunaBi Ch
Mother Earth Project	Germany, Global	

Umweltinstitut München	Germany	Umweltinstitut München e.V.
Fossilfri Fremtid / Fossil Free Future	Denmark	Fossilfri Fremtid
Frack Free United	United Kingdom	
Zero Hour France	France	ZERO HOUR
Weald Action Group	UK	WEALD ACTION GROUP
Frack Off London Lorraine Inglis	UK	Frack off Innon
BUND, Kreisgruppe Rotenburg Wümme	Germany	FRIENDS OF THE EARTH GERMANY
Bürgerinitiative gegen CO2-Endlager	Germany	STOPPT CO2-ENDLAGER www.kein-co2-endlager.de
Not Here Not Anywhere	Ireland	

Milieudefensie (Friends of the Earth Netherlands)	Netherlands	DEFENSIE
Say No to LNG	Global	SAY NO TO LNG
Red "Gas No Es Solución"	Spain	GAS es solución
Netzwerk Energiedrehscheibe	Germany	Netzwerk Energiedrehscheibe
Zukunftswerkstatt Wilhelmshaven	Germany	Zukunfts Warkstatt Wilhelmshaven
Campagna Nazionale Per il Clima Fuori dal Fossile	Italy	the second
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Emergenzaclimatica.it	Italy	E M E R G E N Z A Emergenzaclimatica.it
Forum Ambientalista	Italy	FORUM AMBIEN TALISTA
Comitato Cittadini per l'Ambiente Sulmona	Italy	COMITATI CITTAD COMITATI CITTAD PER L'AMBIENTE SULMONA
Coordinamento No SNAM	Italy	ORENDIANO UN VOST
Rete Legalità per il clima	Italy	RETE LEGALITÀ PER IL CLIMA

GreenVivi	Italy	Ċ
Faenza Eco-logica	Italy	Faenza eco-logica
Terra Blu	Italy	TERRABLU
Comitato Liberi Cittadini No Deposito GNL Brindisi	Italy	NO DEPOSITO GNL BRINDISI
Confederazione Cobas Nazionale	Italy	COBAS
Rise for Climate Belgium	Belgium	rise for climate belgium
Parents for Future Global	Global	FOR FUILING

Friends of the Earth Malta	Malta	friends of the earth malta
NaLaKiZu Bürgerstark	Germany	
Supporting non-Europea	n Organizations	
Texas Campaign for the Environment	United States	FOR THE THE THE THE THE
Gulf South Fossil Finance Hub	United States	
Alianza Mexicana contra el Fracking	Mexico	ALIANZA MEXICANA CONTRA EL FRACKING
Innovation pour le Développement et la Protection de l'Environnement	RD.Congo	UPE / asb/
FrackBustersNY	USA	FRACK PrackBustersNV-org

Science and Environmental Health Network	United States	SCIENCE SCIENCE SCIENCE HEALTH N E T W O R K
Quanah Parker Brightman Executive Director United Native Americans n	USA	
Coastal Watch Association	USA	COASTAL WATCH ASSOCIATION 97 the BN
Oilfield Witness	USA	WITNESS
Animals Are Sentient Beings, Inc	USA	Change for Society Force, Inc. 2011 Ban Action to Annual Workshingtownerformerforme.org
Protect all Children's Environment	USA	Protect All Children's Environment Est. 1987 in support of the chemically injured and disabled
Conexiones Climáticas	México	CONEXIONES CLIMÁTICAS
Society of Native Nations	US	SOCIETAS REFERENCES NATION

Sustainable Energy Group	Canada	SUSTAINABLE ENERGY GROUP CARLETON COUNTY
Freeport Haven environmental justice	United States	
Citizen's Oil & Gas Council	Canada	
New Brunswick Anti-Shale Gas Alliance	Canada	

Endnotes

^{II}<u>https://www.foodandwatereurope.org/wp-content/uploads/2024/01/Europe-CSOs-letter-on-LNG-25Jan20</u> 24-1.pdf

⁽ⁱⁱ⁾ <u>https://www.marietoussaint.eu/actualites/lettre-joe-biden</u>

^[iii]https://www.bruegel.org/policy-brief/decarbonising-competitiveness-four-ways-reduce-european-energyprices

^[w] <u>https://ieefa.org/european-Ing-tracker-september-2024-update#section2</u>

^M<u>https://www.energy.gov/sites/default/files/2024-02/088.%20Bruce%20Robertson%2C%20IEEFA%2C%2</u> 0Carbon%20capture%20has%20a%20long%20history.%20Of%20failure..pdf

https://ieefa.org/sites/default/files/2024-03/CCSpresentation4-MPCMarch24_CK.pdf

^[vi] <u>https://news.cornell.edu/stories/2024/10/liquefied-natural-gas-carbon-footprint-worse-coal</u>

^[vii]https://www.energy.gov/sites/default/files/2022-08/38.%20Kayrros%20-%20Methane%20Emissions%20 Worsening.pdf

https://www.research.howarthlab.org/documents/Howarth2022_EM_Magazine_methane.pdf

^[ix] CAT is an independent scientific project that tracks government climate action and measures it against the globally agreed Paris Agreement aim of "holding warming well below 2°C, and pursuing efforts to limit warming to 1.5°C. Source: <u>https://climateactiontracker.org/</u>

^[x]<u>https://climateactiontracker.org/publications/massive-gas-expansion-risks-overtaking-positive-climate-pol</u> <u>icies/</u>

^[xi]<u>https://energy.ec.europa.eu/news/new-eu-methane-regulation-reduce-harmful-emissions-fossil-fuels-europe-and-abroad-2024-05-27_en</u>

[xii] <u>https://www.eia.gov/todayinenergy/detail.php?id=56320</u>.

^[xiii] See <u>https://energytransition.org/wp-content/uploads/2021/07/What-is-fracking.jpg</u>.

^[xiv] See <u>https://concernedhealthny.org/compendium/</u>.

[xv]https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-r esponsible-business/corporate-sustainability-due-diligence_en

^[xvi]<u>https://www.csr-in-deutschland.de/EN/Business-Human-Rights/Implementation-support/Sector-dialogue</u> <u>s/Energy-sector-dialogue/publication-potential-human-rights-risks-along-supply-and-value-chains.html</u>