

**BETTER
WITHOUT
BOILERS**

THE GAS LOBBY'S BOILER BATTLE

March 2023

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Executive Summary

The EU’s Energy Performance Building Directive (EPBD) could transform the continent’s energy use, creating a green, sustainable and affordable future for millions of Europeans, and crucially, ending the potential for Russia and other fossil fuel autocracies to blackmail the democratic world.

Europe is the world’s largest natural gas market, and home use accounts for the majority of gas consumption on the continent. Naturally, the gas lobby’s attention has shifted to the domestic sphere, in particular the humble gas boiler, the core of gas heating systems in millions of homes.

As Europe’s representatives prepare to decide the fate of the EPBD in crucial votes in March 2023, this report reveals:



- The connections between the gas lobby and some of the most pivotal figures in the debate over the future of domestic gas consumption in Europe, with evidence that suggests some MEPs contacted by lobbying groups repeat arguments on hybrid solutions and hydrogen made by lobbyists and astroturfing campaigns.
- The gas industry’s undeclared front organisations, such as Rural Futures, seeking to influence the vote in Brussels and beyond, with Lobbying firms using loopholes in the European Commission and the European Parliament’s transparency rules to hold unregistered meetings and events.
- Attempts to paint the question of the future of domestic heating as a city versus countryside issue.
- The unscientific messaging on “green hydrogen”, “renewable fuels” and “hybrid boilers” spread by the gas lobby.

The Russian invasion of Ukraine has shown that Europe can no longer rely on foreign fossil fuels to keep its homes, offices and factories fit for habitation. And yet the desperate gas industry and its lobbyists are working round the clock to sustain its unsustainable, unhealthy business model. Europe’s sustainable future depends on our elected representatives rejecting the gas lobby’s tactics.

Better Without Boilers is a coalition between the European Environmental Bureau, the Environmental Coalition on Standards and Green Transition Denmark.

Introduction

When the European liquefied petroleum gas industry gathered in Barcelona last autumn, there was one subject on everyone’s mind: the European Union’s Energy Performance of Buildings Directive (EPBD).

The relatively obscure piece of legislation, covering how houses in the EU are heated, cooled and insulated, is seen as an existential threat by the gas lobby. In particular, the lobby is focused on discussion about the phasing out of the gas boiler in European homes.

Henry Cubbon, LPG president of fuel distributor DCC, told the conference: “The gas boiler is our livelihood — if it gets banned, we have a real problem. We are doing a lot of work with regulators to see if we can position the gas boiler as a heating source of the future, powered by renewable gas.”

The gas lobby has been preparing for this moment for years, seeding ideas that now seem commonplace: electric heat pumps are too expensive and unwieldy; they don’t work well in cold climates; the transition

from gas is an urban obsession that will hurt rural communities, and, perhaps most prominently, that hydrogen is a cheap, renewable, and clean fuel that can easily be slotted into existing gas infrastructure ^[1].

Now, as a crucial vote on the EPBD looms, this report can reveal that:

- Lobbying groups enjoy almost unlimited access to MEPs and Commission officials, with events and meetings going unregistered.
- The gas lobby deploys front groups to pose as grassroots campaigns or policy advisory bodies to promote industry lines.
- Several strands of lobbying activity have converged to stall the complete phasing out of gas boilers, promoting “hybrid” solutions that ignore huge costs, technological limitations, and environmental damage.

An army of lobbyists

For years, the biggest spender in lobbying circles had been the energy lobby. The natural gas industry alone spends more than €100 million per year to fund its activities ^[2]. Employing over 1,000 people, it enjoys unparalleled access to officials on all levels, with its lobbyists stalking the corridors of the European Parliament.

In recent years, the European Commission has put forward a number of initiatives around the European Green Deal that will provide the roadmap for Europe's transition away from fossil fuels. During this time, energy companies, gas boiler manufacturers and trade associations have applied tremendous pressure on legislators in an effort to water down the provisions of such directives as the EPBD, and hamper the phasing out of natural gas and the boilers using it, by promoting "hybrid solutions". The lobbyists' efforts are made easier by a scandalous lack of transparency in their dealings with MEPs and Commission officials, a "revolving door" culture between powerful corporations and politicians, and a European Commission that is all too keen to accommodate the fossil fuel industry in the wake of the Russian invasion of Ukraine,

Ever-closer union

Under Ursula von der Leyen, the Commission met with organisations from the fossil fuel industry more than 500 times in the first half of its five-year mandate, between December 2019 and May 2022 - meetings largely predating the fuel crisis brought on by Russia's invasion of Ukraine ^[3].

The relationship between official EU bodies and lobbying groups grows ever-closer, effectively making the presence and influence of these

special interest groups part of the machinery of governance.

“If the gas lobby succeeds in its push for hybrid hydrogen boilers, consumers across the EU will face increased energy bills for years to come.”

Advisory group or lobbying platform?

Following the beginning of the Russian invasion of Ukraine, the [EU Energy Platform Industry Advisory Group](#) ^[4] was set up in late October 2022. Its stated mission is to “provide feedback and comments on options issued by the Commission for natural gas and LNG (and, in the future, hydrogen) demand aggregation and joint purchasing”, and give “insights and advice” on how to ensure that the EU's goal of “reduction of dependency on gas supplies from Russia can be achieved... with a particular focus on the diversification of gas supply”. The advisory group provides industry representatives with top-level, regular access to the Commission on the development of the RePowerEU plan and how and where the EU will source new gas.

Its membership includes companies like [Shell](#), [TotalEnergies](#), [Eni](#), [Repsol](#) and [BP](#), as well as industry lobby groups like [HydrogenEurope](#), [ENTSO-G](#), [Eurogas](#) and [Gas Infrastructure Europe](#) as observers. To make matters worse, there is not a single public interest organisation representative in the group, which operates with virtually no transparency under “an obligation of professional secrecy” clause.

The role of Liquid Gas Europe

Industry body Liquid Gas Europe (LGE) [5] counts among its members Spanish oil and gas company Repsol, Dutch LPG and LNG firm SHV Energy and UGI International, the European branch of American domestic gas supplier UGI Corporation. LGE promotes “hybrid” solutions for gas boilers and the adoption of hydrogen as a clean fuel.

Typically for the sector, LGE shows huge discrepancies between operational costs and official meetings/lobbying activities. **For a declared budget of almost €1 million in the past three years, LGE has not registered any meetings since the 29th of April 2020.** This indicates that their lobbying efforts are concentrated on events and lower level meetings that they don't have to declare, a huge issue for transparency and democratic accountability.

Our research has established that Liquid Gas Europe is in contact with senior MEPs and Commission officials who participate in events organised and chaired by the group and its campaign front Rural Futures, which have not been declared on official registries by LGE or the officials themselves. Using COVID-19 as a pretext, lobbying groups have moved many of their meetings and events online, where rules around transparency are murkier for MEPs - but not so for Commission officials.

Rural Futures

Through a campaign front called Rural Futures, LGE promotes the idea that rural communities around Europe have different needs to major cities and that “the current EPBD proposal is limiting rural consumers to technologies that are unsuitable and unaffordable.” According to their website, Rural Futures says it wants policy makers to:

- Avoid a “detrimental” ban on boilers
- Support renewable liquid gases
- Support improved air quality

Rural Futures organised events, chaired by the General Manager of Liquid Gas Europe, Ewa Abramiuk-Lété, where EU officials and MEPs were among the speakers, including:

- An event hosted by Rural Futures and promoted on the Euractiv media platform in June 2022, where two of the speakers were Stefan Moser, Head of Unit B3 - Products and Buildings, DG ENER, European Commission and MEP Seán Kelly, (EPP, Ireland), Shadow Rapporteur on the EPBD, European Parliament ^[6]
- Kelly, who leads EPP policy on the EPBD, was also the lead speaker at the European LPG e-Congress in September 2021, hosted by LGE. ^[7]

“ **The future of the gas boiler has become the key battleground in the future of European energy provision and security.** ”

- Another event organised by RF in October 2022, included MEP Franc Bogovic (EPP, SI), the Co-president of RUMRA Intergroup and Anne-Katherina Weidenbach — Member of EU Commissioner for Energy Kadri Simson’s cabinet, with Abramiuk-Lété again chairing the discussion,^[8]

Despite the fact Rural Futures is just a project by Liquid Gas Europe - as its own website makes clear - its activities are not registered as lobbying by LGE, and neither are its meetings with the above officials.

On all the occasions listed above, neither the event nor contact with the lobbying group were registered by the MEPs or the Commission officials. And while rules around what MEPs are required to register are more flexible and limited to specific circumstances, the same does not apply to Commission officials. The European Commission requires that all interest representatives engaging in lobbying activities must register in the EU Transparency Register, a publicly accessible database of organisations and individuals engaged in activities influencing EU decision-making. In addition, lobbyists must follow a Code of Conduct, which includes principles such as transparency, honesty, and integrity.

The Code of Conduct requires that lobbyists disclose the identity of their clients, the issues they are lobbying on, and the budgets they allocate to lobbying activities. Lobbyists must also respect the rules on access to EU institutions and meetings with EU officials. Failure to comply with these rules may result in a loss of access to EU institutions or a removal from the Transparency Register, but this rarely happens despite blatant violations.

But the results of these connections are evident in the actions of those involved: as revealed ^[9] by Green MEP Ciarán Cuffe, during the negotiations around the

EPBD vote, the EPP and Seán Kelly, their negotiator on the bill, “were clear that they would not support it unless that provision [hybrid solutions] was included, so a compromise was required to reach a deal.”

In the case of Bogovic, we can also see how that might be problematic. As mentioned earlier, Bogovic is co-chair of RUMRA, a European Parliament intergroup that is supported by Future of Rural Energy in Europe (FREE), an initiative that “gives a voice to all those who believe that rural energy needs are important issues both for those who live in the countryside and for European society as a whole”, and its agenda closely resembles that of Rural Futures. Days after the undeclared LGE event, Bogovic held a meeting



with the **Slovenian power company HSE**, and his meetings prior and after have all been around Agricultural Policy and waste management.

HSE itself has not declared any lobbying activity since 2020 (when it spent between €25,000 and €50,000) and there are no entries of meetings it has held with MEPs or Commission officials. And yet, an MEP held one meeting with an energy lobbying group which he didn’t register, and then registered one with an energy company that has not registered any lobbying activity for years.

The party line

A 2021 joint investigation ^[10] by Global Witness and Corporate Europe Observatory found that while the MEP for Poland Zdzisław Krasnodębski was refusing to reveal what meetings he had held with lobbyists, he had hosted events for the fossil gas lobby, and the amendments he tabled mirrored industry demands. Krasnodębski has echoed industry arguments that the EU should continue to support building new gas infrastructure despite both plentiful existing capacity ^[11], and the need to make massive cuts in gas use in order to meet the Paris climate goals ^[12].

In January 2021 Krasnodębski was appointed ^[13] Vice-Chair of the Committee on Industry, Research and Energy (ITRE). This Committee leads ^[14] on the European Parliament's negotiating position for the revision of the Trans-European Networks for Energy Regulation (TEN-E), an EU law that controls where billions of euros in subsidies for energy projects will flow.

Inventing needs

In an article ^[15] published on LinkedIn in late January 2023 by Ewa Abramiuk-Lété, the General Manager of Liquid Gas Europe, the lobbying group's aims and messaging are set out clearly:

“As the Energy Performance of Buildings Directive (EPBD) continues its progress towards a vote in the European Parliament, it is becoming clear that some of the proposed revisions, particularly the option for Members States to ban gas boilers from 2040, will impose significant financial costs on many of the most vulnerable citizens and communities in the European Union, who will be forced to replace existing boilers with significantly more expensive alternatives. The investment cost for heat pumps, for instance, is four times higher than the one for gas boilers that can use renewable liquid gases.”

To summarise, lobbyists are arguing that a ban on gas boilers will be too costly for the consumer. They also

argue that the framework set out by the EPBD leaves behind Europe's rural communities. As we saw earlier in this report, Liquid Gas Europe has set up Rural Futures, a front organisation that is now organising events with MEPs and Commission officials.

In the October 2022 event attended by the Commission's Anne-Katherina Weidenbach and Franc Bogovic, Liquid Gas Europe's agenda was to discuss its interpretation of how the EU's Green initiatives could better reflect the needs of rural areas in relevant policy developments in EU legislation, and present rural areas' challenges in their path toward a successful energy transition. The event description said that its aims were to “address important questions” such as:

- How to ensure coherence between social acceptability and climate policy objectives?

- What are the implications of ongoing EU legislative developments regarding energy for rural communities?
- What could be improved in some of the legislative proposals to effectively and immediately mitigate the challenges for homes in off-grid areas?
- What are the sustainable energy solutions that are better suited to rural communities?



Is “hybrid” really green?

The natural gas industry fails to distinguish between Green and Blue, Brown and Black hydrogen in its messaging, and what they mean by renewable liquid gases - but the difference between them is substantial. Green hydrogen is produced by electrolysis of water into hydrogen and oxygen, only using energy produced from renewable sources. The process is costly and would send bills rocketing, but is emission free and renewable. Due to limited availability, its main beneficiary will probably be heavy industry, as climate think tank E3G argued in a 2021 report ^[16] and is therefore not a solution for heating the majority of homes. Blue hydrogen on the other hand, the second best alternative, is a completely different deal. Produced from methane gas by a steam reforming (SMR) process, blue hydrogen produces high amounts of CO₂, with an added risk of methane leaking along the supply chain. Only the capture and storage of the carbon dioxide produced (CCS) would make this process clean in any sense, but carbon capture technology is simply not ready to be deployed in that capacity yet - and there are doubts it ever will be. Brown and Black hydrogen are produced by burning brown and black coal respectively, so they are even more problematic.

And yet, this simple distinction doesn't feature anywhere in the Parliament's or the Commission's reasoning when these issues are discussed. It's exactly this level of complacency that the natural gas lobby is looking to exploit.

Focus on gas boilers

In 2020, most of the EU final energy consumption in the residential sector was covered by natural gas (31.7%)^[17]. These households represent one of the biggest clients to the natural gas industry, their access to the product hinging on the humble gas boiler. These numbers are incentive enough for the gas lobby to spring into action and ensure that boilers stick around for as long as possible.

To better understand how almost the entire energy sector lobbying has focussed on gas boilers specifically, and the methods they're using, we can examine how major players focused their policy influencing efforts on different directives that were indirectly tied to the EPBD. One example was the opposition to a potential fossil gas boiler phase-out in the Energy Efficiency Directive (EED) and gaining recognition for fossil gas in the energy savings obligation - plus the amounts of money they invested.

The most engaged entities with these positions on the revision of the EED are:

- The International Association of Oil & Gas Producers Europe (IOGP)^[18], whose members include BP, SHELL and every major fossil fuel producer in Europe, with a **yearly budget of €1,000,000 dedicated to lobbying**,
- Naturgy, which operates as a front for the Gas industry specifically, with an annual budget of **€100,000**.
- PGE, Poland's largest energy sector company, which dedicates almost **€400,000 yearly to its lobbying activities**.

“**The gas lobby has been preparing for this moment for years, seeding ideas that now seem commonplace.**”

As Influence Map found in a 2022 report, examples of these entities promoting fossil gas in the EU Energy Efficiency Directive through opposition to the phase out of fossil fuel heating technologies, and recognition of fossil gas in the energy savings obligation included^[19]:

- Trade association IOGP did not support the phasing out of fossil gas heating systems in the EED revision, instead promoting a role for fossil gas in its January 2021 consultation response.
- In its February 2021 consultation response, Polish utility PGE advocated against the phase out of fossil fuels in heating systems and banning of fossil fuel heating systems in new buildings in the EED revision, instead emphasising the role of fossil gas in the energy transition.
- Trade association Gas Distributors for Sustainability (GD4S) appeared to suggest fossil fuel technologies should continue to be used for heating systems, and emphasised the cost of banning fossil gas boilers in its February 2021 legislative consultation response.

- Gas Infrastructure Europe, in its February 2021 consultation response, promoted the role of fossil gas in its opposition to the phase out of fossil fuel heating systems in the revision of the EED.
- In August 2021, Eurogas argued in its newsletter against the exclusion of direct fossil fuel combustion energy savings from the Energy Savings Obligations in the EED, stating it “would reduce incentives for Member States that rely on coal and oil to take measures to switch away from those fuels.”
- They can be deployed easily and cost-effectively, ensuring that no consumers is left without a heating solution;
- They provide with the necessary demand flexibility that is required to optimise energy grids and renewables integration, resulting in costs savings for consumers.”

They go on to highlight that one of the pieces of the directive, specifically ANNEX III to the EPBD, which sets out the requirements for new and renovated zero-emission buildings and calculation of life-cycle global warming potential, “risks jeopardising such an approach.”

Hybrid no good?

In emails to MEPs seen by BwB ahead of the February vote on the EPBD report, lobbyists for Gas Distributors For Sustainability (GD4S) ^[20] pushing for the introduction of hybrid gas boilers as an intermediate solution to full transition away from fossil argued that:

“Hybrids solutions, such as Hybrid heat pumps or micro-cogeneration, & efficient gas boilers coupled with renewable gases such as biomethane and hydrogen, have multiple benefits:

- They allow for rapid energy efficiency gains and a rapid reduction of gas demand in heating, and will be progressively decarbonised as the share of renewable gases used increases, contributing to fully decarbonising buildings in complementarity with heat pumps and district heating.

The same lobbying email states that: “In connection with the definition of Zero Energy Buildings, the current version of the annex only allows zero emission buildings’ residual energy to be covered by renewable electricity or renewable heat and cooling, but not by renewable gases. Such omission would prevent the use of any renewable gases in heating, which would be misaligned with the agreement found on the rest of the text and send a very negative signal for the scaling up of biomethane and hydrogen production in Europe, while leaving multiple consumers without access to an affordable clean heating solution.”

They go on to propose an amendment which would expand the solutions specifically mentioned in the EPBD to include “any other renewable energy purchase agreement as long as it complies with sustainability criteria” which in this case include natural gas in the short term and hydrogen in the long term.

Bad science

The technology to produce and distribute enough hydrogen to heat Europe's homes does not exist and is unlikely ever to exist. According to the German energy-transition think-tank Agora Energiewende, there is "no credible financing strategy" for the use of H₂ in heating: "gas distribution grids need to prepare for a disruptive end to their business model" ^[21].

For gas companies, this is a matter of life or death: if they cannot supply fossil gas to people's homes in future, and cannot replace it with a supposedly cleaner gas, namely blue hydrogen, then they don't have a viable business. Given the cost and technological challenges that hydrogen carries, it is clear that the gas lobby's real plan is to use "hybrid" gas boilers to continue pushing natural gas in perpetuity.

“The technology to produce and distribute enough hydrogen to heat Europe's home does not exist and is unlikely ever to exist.”

True cost of hybrid

If the gas lobby succeeds in pushing for hybrid hydrogen boilers, consumers across the EU will face increased energy bills for years to come while fossil fuel companies continue to make huge profits. Hydrogen is the most expensive alternative to natural gas and will cost more than gas does today. Electric heat pumps and insulation could see bills cut by half by 2050^[22]. Hydrogen could see them double ^[23].

Crucial vote

In February, MEPs approved the latest draft of the Energy Performance of Buildings Directive (EPBD). The EPBD is an EU directive that aims to improve the energy performance of buildings within the EU. The directive requires EU member states to set minimum energy performance requirements for new and existing buildings, and to establish systems for building certification and inspection.

The EPBD also requires member states to establish national plans for the renovation of existing buildings, with the aim of improving their energy performance. These plans must include targets for the reduction of energy consumption, greenhouse gas emissions, and the promotion of the use of renewable energy sources in buildings.

Additionally, the EPBD requires member states to ensure that all new buildings are nearly zero-energy buildings (NZEBs) by the end of 2020. NZEBs are highly energy-efficient buildings that produce as much energy as they consume over the course of a year.

The EPBD is an important tool for improving energy efficiency in buildings and reducing greenhouse gas emissions in Europe. It provides a framework for member states to set and achieve ambitious targets for building energy efficiency, and promotes the use of renewable energy sources in buildings.

Furthermore, The European Council's EPBD revision proposed that from 2030, all new buildings have to be zero emissions (no fossil fuels at all). It also obliges Member States to plan for a fossil heating and cooling phase out by 2040 and introduces a 2027 (now moved forward to 2025) end date for fossil heating subsidies.

It is, in other words, a massive opportunity to dramatically reshape European energy policy and needs, through the improvement of buildings across Europe, increasing efficiency and ultimately leading to reduced energy costs and demand.

In its next stage in mid-March, EPBD will be discussed in a plenary vote. Many of its most ambitious provisions have already been watered down in the negotiations ahead of the February vote ^[24]. Now, the gas lobby, alongside gas boiler manufacturers, and their allies in parliament, will attempt to water down this ambitious agenda even further during the negotiations taking place.



Conclusion

The future of the gas boiler has become the key battleground in the future of European energy provision and security. As Europe moves towards a green transition, the fossil fuel industry is fighting an existential battle, as its future is uncertain if the very means to consume their products is phased out.

By promoting hybrid solutions and inventing left behind communities, the gas lobby is not just trying to buy time, but to create a situation where they have the opportunity to keep selling natural gas in perpetuity, as the forbidding costs of hydrogen become apparent. They are aided by an opaque, labyrinthine structure that allows them access to EU officials under no democratic scrutiny. It is becoming clear that in the next stage of the negotiations around the EPBD, lobbyists will try their best to water down the most important provisions included in the directive. Unless we expose exactly what their aims are, we leave the door open for the introduction of loopholes and “small print” that will invalidate any progress made elsewhere.

About Better Without Boilers

Better Without Boilers is a coalition between the European Environmental Bureau, the Environmental Coalition on Standards and Green Transition Denmark. It calls upon the EU and European leaders to support the shift away from oil and gas boilers to cleaner, more affordable alternatives for Europeans to heat their homes.

This report was co-authored by 89up's investigation team, Yiannis Baboulias and Padraig Reidy.

Yiannis Baboulias is an investigative journalist who has worked for international media outlets like Foreign Policy, the Atlantic, the LRB, The Guardian, and Al Jazeera English and others for over a decade.

Padraig Reidy is a writer and editor who has written on human rights, media freedom and politics for publications from the Sun to the New Statesman.

Note: The BwB's advisory members, Öko-Institut and E3G, are not parties to this report.

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