

Dear Member of the European Parliament,

The 19th of December of 2021, the European Commission proposed, through a delegated act, the fifth list of the Projects of Common Interest (PCIs) that included, among others, 67 cross-border electrical interconnection projects. The implementation of this particular form of centralized energy transition implies inadmissible impacts on the biodiversity, the citizens and the landscape, as well as a huge wastage of energy in the process of long distance electricity transport. This represents an opportunity cost and the loss of the possibility of implementing alternative energy transition models based in the relocation of energy productions: models that promote a distributed energy production and a fairer and more even sharing of the impacts, costs and benefits of the energy transition.

The undeniable need to decarbonize our economy and the adoption of the *EU Green Deal* have led to the implementation of the energy transition, aided by the *NextGenerationEU* funds.

Moreover, there is a consensus in Europe that, to face the current climate emergency, it is necessary to develop a renewable-based energy production system that substitutes our fuel-based energy production system. Nevertheless, because we don't want this energy transition to become a historical error and a lost opportunity, we feel the need to highlight and condemn the specific form in which this transition is being implemented.

We are witnessing an energy transition that is mainly materializing as aggressive industrial megaprojects for the production of solar and wind energy that create large areas specialized only in energy production. This territorial specialization involves profound impacts in biodiversity, agriculture, local cultural heritage and the way of life in rural areas of some of the Member States.

In the case of Spain, the situation is particularly dire. In fact, the severity of the situation of our country was already reported by 23 biodiversity specialists in the prestigious magazine *Science* at the beginning of the year¹. From that early report, the situation has steadily continued to deteriorate. Every day dozens of renewables-based energy production projects are opened to public consultation, in a context of a complete absence of planning and of frustration of the citizens, whose rights are disregarded.

This system entails the establishment, without any chance of public debate, of "disposable areas" that are *de facto* considered worth sacrificing over others. Meanwhile, all these deep implications of the energy transition to renewables are invisible to the urban world, whose increasing levels of energy consumption and the impacts that derive from them are never called into question.

Alianza Energía y Territorio (ALIENTE) [Energy and Territory Alliance] emerged, at the beginning of 2021, to give an answer to this issue and it is a citizen platform that currently integrates 199 associations from Spain and whose manifesto for a transition to renewable energies that guarantees biodiversity conservation (<https://aliente.org/manifiesto>) is supported up-to-date by more than 270 scientists.

Within this context, the aim of this letter is to bring the issue described in the previous lines to the European authorities' arena, since it does not affect only Spain. In particular, we want to bring to your attention the potential multiplier effect on the impacts described above if the fifth list of the PCIs was to be adopted.

1 <https://www.science.org/doi/10.1126/science.abf6509>

We believe this wrong is facilitated not only by a clear lack of capacity of the Member States to confront such an avalanche of proposals of industrial renewable energy production and associated infrastructure macro projects but also by the *Trans-European Network for Energy* (TEN-E), whose cross-border electrical interconnection projects play a role in multiplying the impacts of the energy transition.

The list of the PCIs is contributing to create a European electrical market that further aggravates the problem. To, supposedly, complete the triple aim of securing energy supplies, reduce costs and accelerate decarbonization there is a clear bet for a very concrete energy model, characterized by being centralized and by assuming that large-scale projects and big electrical lines are the only possible way to confront the current climate and natural resources crisis. This leaves entirely out of the equation the possibility of building an evenly distributed model that enables us to share fairly among the territories the impacts, benefits and costs of the transition.

We want to remark that the centralized energy transition model promoted by the current TEN-E represents the loss of an opportunity to implement a truly sustainable energy transition, with a proven record of energy efficiency and energy saving. Even if, through the so-called *Winter Package*, (also known as the *EU Clean Energy Package*) the UE highlighted the need to promote an energy transition that prioritizes efficiency and energy saving (<https://aliente.org/constituir-comunidades-energeticas>); in practice, the energy transition is taking place by implementing a very narrow and specific agenda that stems from a blind greenwashed developmentalism mindset and completely disregards how it impacts biodiversity and the territories, as well as the physical limits of our planet.

The mechanism that supports this specific transition model seems particularly perverse: the TEN-E imposes the need of having a capacity for interconnection proportional to the production capacity of every Member State. Currently, a 10% of this capacity, with the possibility of it being a 15%, pending authorization. This mechanism disregards all the conditioning and geographical barriers that have motivated the current level of electrical interconnection between the states; and puts in motion a vicious circle that means that more renewable production implies more interconnection capacity, which, in turn, makes possible integrating more renewable production, perpetuating the concentration of the impacts of the transition in some appointed territories.

For all the reasons mentioned above, and taking into account that the compliance with one objection of the Union can not imply going against other goals of the Union, from ALIENTE we want to ask you, in your quality as a member of the ITRE Committee, to vote in favour of the OBJECTION raised against the fifth list of the PCIs that is to take place on the 22nd of February of 2022 so that the list of the PCIs can be rejected in its entirety.

Should you need any further clarification in this matter, please, do not hesitate to contact us.

Yours faithfully,

Alianza Energía y Territorio (**ALIENTE**)

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