



**Mr Maroš Šefčovič**

Vice-President in charge of the Energy Union  
European Commission  
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BELGIUM

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Dear Vice-President,

The last State of the Energy Union report shows that the EU makes good progress towards its common objectives of a well-functioning internal energy market and security of supply. This is a positive development and you can count on BusinessEurope to continue to constructively support the European Commission in this important task.

However, I would like to express our concerns regarding the proposed revision of the gas directive (amending Directive 2009/73/EC concerning common rules for the internal market in natural gas). Without prejudging the need for an overall reform of the gas market, the proposed recast focusing on "gas interconnectors", i.e. gas pipelines which connect Member States of the EU with third countries, raises serious questions of principle regarding the EU 'better regulation' agenda.

The proposal represents a significant change of the EU and EEA regulatory frameworks for interconnector gas pipelines, with possible impacts on numerous EU-third country relationships such as Russia, Morocco, Tunisia, Algeria, Libya, Israel and the United Kingdom (after Brexit). It goes without saying that such a move raises questions, for instance on the impact of mid- to long-term security of supply of Europe, but also on the functioning of the internal energy market. However, the European Commission has put forward the proposal without prior "stakeholder consultations", "impact assessments" or any evidence-based evaluation process of existing regulation. In addition, by opting for a fast legislative procedure there will be less possibilities for in-depth regulatory scrutiny from the co-legislators, which is highly problematic for a proposal like this one.

Against this backdrop, we urge the European Commission to reconsider its approach. A well-informed and evidence-based debate, building on stakeholder consultation and a thorough impact assessment before the proposal is drafted, in the context of a greater review of the gas market in 2020 (so-called 'Gas Market Design'), is what Europe deserves on such a crucial matter.

I remain at your disposal for further discussions on this important matter.

Yours sincerely,

Markus J. Beyrer