



Council of the European Union
General Secretariat

Brussels, 19 May 2025

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LIMITE

ENER
CYBER
RELEX
PROCIV

HYBRID
TELECOM
COMPET
ENV
CLIMA

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Energy
Subject:	Council Conclusions on energy security: NL comments (ST 8525/25)

Delegations will find in the annex the NL comments on the Council Conclusions on energy security (ST 8525/25).

Brussels, 7 May 2025
(OR. en)

8525/25

LIMITE

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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Draft Council Conclusions on strengthening the Energy Union through reinforcing energy security

In view of the Energy Working Party on 8 May 2025, delegations will find in the annex REV1 of the draft proposal for the abovementioned Council conclusions.

New text is **bold underline** and deletions are ~~striketrough~~.

Draft

Council Conclusions on strengthening the Energy Union through reinforcing energy security

RECALLING:

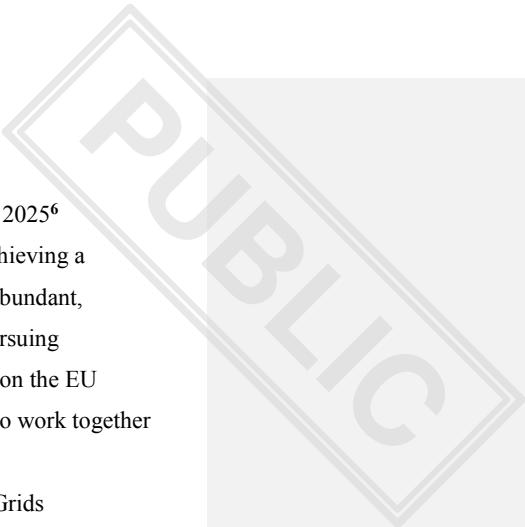
- that the primary aim of the Energy Union¹ is **to further develop the European single market**, to provide safe, **secure**, clean and affordable energy for the EU citizens **and industries**, while Europe's reliance on ~~imported~~ fossil fuels **causes risks high** energy price volatility, and high supply costs, and makes the EU vulnerable to external pressure and global market ~~uncertainty~~ **instability**;
- that since Russia's war of aggression against ~~the~~ Ukraine the EU ~~has embarked on an~~ **accelerated its** ambitious project of decreasing its dependency on fossil fuels and significant milestones have already been achieved, owing ~~to~~ in particular **to**:
 - the Commission Communication of March 2022² proposing the outline for the REPowerEU Plan for more affordable, secure and sustainable energy;
 - the Versailles Declaration of March 2022³ highlighting energy security and the need to phase out the EU's dependency on Russian fossil fuels as soon as possible;
 - the Commission Communication on REPowerEU of May 2022⁴ on reducing dependency from Russian energy, speeding up the **clean** energy transition and achieving a more resilient energy system and a true Energy Union, which was followed by a series of important emergency legislative instruments adopted by the Council, **as well as the legislation under the "Fit for 55" package**;

¹ COM (2015) 080 final

² COM (2022) 108 final

³ Text available on: <https://www.consilium.europa.eu/en/press/press-releases/2022/03/11/the-versailles-declaration-10-11032022/>

⁴ COM(2022) 230 final

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- the European Council conclusions of April 2024⁵ and of March 2025⁶ underlining the importance of agreed energy targets and ~~of~~ achieving a genuine Energy Union **before 2030**, by securing the supply of abundant, affordable and clean energy, that serves the dual objective of pursuing European energy sovereignty and climate neutrality and calling on the EU institutions, the Member States and other relevant stakeholders to work together to deliver on those goals;
 - the Council Conclusions on Advancing Sustainable Electricity Grids Infrastructure of May 2024⁷, which emphasise the need to ~~be protected~~ **protect the EU** against new threats and ~~a~~ the need for a coordinated set of energy security measures;
 - **the Council Recommendation on a Blueprint to coordinate a response at EU level to disruptions of critical infrastructure of June 2024⁸**;
 - the Commission Communication of February 2025 on the Action Plan for Affordable Energy which presents measures to lower energy bills, to accelerate the implementation of cost-saving structural reforms, **to complete the Energy Union** and to strengthen the EU energy systems to mitigate future price shocks;
 - **the Commission Communication of February 2025 on the Action Plan for Cable Security which aims to increase the security and resilience of the EU's infrastructure, including both electronic communications and electricity**;
 - ~~— the Council Recommendation on a Blueprint to coordinate a response at EU level to disruptions of critical infrastructure, adopted in June 2024⁷~~
 - the Commission Communication on European Internal Security Strategy of April 2025 aimed at strengthening the EU capabilities to respond in particular to hybrid threats such as sabotage and malicious cyber activity against critical energy infrastructure;
 - **the Commission Communication of 6 May 2025 on the Roadmap towards ending Russian energy imports⁹**.

⁵ EUCO 12/24

⁶ EUCO 1/25

⁷ ST 10459/24

⁸ (C/2024/4371)

⁹ **COM/2025/440**

STRESSING:

- the importance of staying on track towards the EU's climate neutrality objectives, as accelerating the deployment of renewable energy and improving energy efficiency will not only drive down energy costs but also reduce EU's dependency on imported fossil fuels and its exposure to their inherent price volatility;
- ~~the need to create while creating~~ a level playing field for investments in clean energy technologies and strengthening their domestic production capacities that allow greenhouse gas emissions to be decreased in Europe and beyond in a technologically neutral way, as well as to protect environment, combat pollution, conserve nature and biodiversity;
- the need for swift implementation of the existing legislation as a foundation for a genuine Energy Union that delivers competitiveness, affordability, security and sustainability;
- the need for further diversification of energy supplies and development of indigenous energy resources to reduce the EU's vulnerability to external political and economic pressure and global prices shocks and high dependencies in value chains, ~~and to~~ strengthen the EU's global position ~~in crucial global value chains~~, by securing better access to critical raw materials and secure components and ~~to investing~~ in domestic clean technology manufacturing capacities that contribute to climate neutrality by 2050;
- that the EU can take advantage of its full economic and political potential in an unstable global environment only when it stays united and speaks with one voice in relation to third countries while remaining committed to multilateralism in the global political dialogue;
- the central role of demand reduction and energy efficiency measures as demonstrated during the energy crisis;
- that the strength of the EU's internal energy market is the cornerstone which allows the EU and its Member States to pursue an ambitious transformation of their energy sectors with a view to providing secure, sustainable, clean and affordable energy for their consumers, while taking into account national circumstances, in particular of energy isolated Member States;

- that Europe needs to reduce its strategic dependencies **in sensitive sectors where these could pose economic or national security risks, in particular by addressing dependencies related to on a limited number of** third country suppliers in sensitive sectors including critical raw materials **and secure components;**
- **The need to accelerate the roll-out of an interconnected and integrated European energy infrastructure to ensure affordable energy and strengthen security of supply,**
- that recent ~~actions aimed at~~ **events** damaging critical EU energy infrastructure on land and at sea **highlight the need for** ~~require~~ stronger coordination between the EU and NATO **and at regional level,** in monitoring and physically securing vital ~~electricity and gas~~ interconnections between the Member States and with **reliable** third countries.

Commented [A1]: The addition of a risk-based approach is very important for the Netherlands. It is important to not blindly reduce dependencies, we need others to achieve our goals of the energy transition. Instead, the EU should focus on mitigating risks those that pose genuine economic or national security risks — while continuing to cooperate internationally wherever possible. To identify these specific risks, research is needed.

TAKES STOCK OF THE PROGRESS ACHIEVED:

- under the 2022 REPowerEU Plan in decreasing the EU's reliance on imports of ~~fuels~~ **energy**, from the Russian Federation in particular, and in lowering the consumption of fossil fuels in Europe, while ~~increasing~~ **accelerating the deployment of clean energy sources and** maintaining stable supplies of energy for EU customers;
- in strengthening the EU's legal framework on energy savings, energy efficiency and facilitation of deployment of renewable energy sources in line with the objectives of the REPowerEU Plan, through the adoption of specific legislation during the energy crisis of 2022-2024;
- in swiftly deploying infrastructure aimed to boost the capacity to provide flexible imports of energy from outside the EU and limit bottlenecks in intra-EU flows of energy;
- in successfully finalising key long-term infrastructure projects across the EU aimed at strengthening the energy security and resilience of the EU Member States, while NOTING that work on important missing infrastructure links is still needed in some regions;
- **on the extension and revision of the gas storage regulation with a view to maintaining security of gas supplies in winter while preventing ~~speculations and manipulations~~ market conditions that hinder cost-effective storage filling on the gas market and allowing Member States to store gas in a more flexible way¹⁰.**

Commented [A2]: It is good to note that although there are indications that speculation on the summer/winter spread caused the inverted summer/winter prices, it is certainly no market manipulation. Market manipulation can be enforced by the NRA's. We therefore prefer to use a more neutral wording.

¹⁰ The wording of this subparagraph may be adjusted based on the results of interinstitutional negotiations on the gas storage regulation

WELCOMES:

- the presentation of the Commission Communication on the Action Plan for Affordable Energy, which sets out, in particular, structural measures to deliver a genuine Energy Union for competitiveness, affordability, security and sustainability, while STRESSING the need to design and implement, as soon as possible, short-term measures, including, where appropriate, by Member States, to limit the burden of high energy costs, including grid tariffs, on households and industry and be prepared for potential energy crises, while maintaining effective market price signals and ensuring stability of financial and energy markets;
- the progress made in creating the Energy Union while NOTING that ~~some~~ future elements of the EU energy architecture and legislation require fine-tuning a solid analysis, in particular when it comes to exploring the full potential of all innovative and technologically neutral solutions aimed at decarbonising the EU's ~~electricity and gas~~ energy sectors and ~~its industries;~~
- the Commission initiative to launch an Energy Union Task Force consisting of high-level representatives of the Member States, institutions and relevant bodies to further strengthen coordination and governance of the Energy Union;
- the planned establishment of a tripartite contract for affordable energy for Europe's industry aimed at creating a favourable investment climate in the energy sector and at increasing the competitiveness of European industry;
- the adoption of the Commission Communication of May 2025 on the Roadmap towards ending Russian energy imports, which sets out the EU-wide action plan for an effective and coordinated and gradual phase out of Russian energy imports from the EU market;
- the launch, through the Omnibus workstream, of the simplification exercise across important EU legislation which ~~has~~ is expected to have a profound impact on lowering the regulatory burden for companies in the energy sector ~~operations of energy companies~~ and energy intensive industries while maintaining alignment with the original policy objectives.

Commented [A3]: We cannot agree to revisiting the 2030 energy targets.

~~the work done so far in the Council on the extension and revision of the gas storage regulation with a view to maintaining security of gas supplies in winter while preventing speculations and manipulations on the gas market and allowing Member States to store gas in a more flexible way⁸~~

HIGHLIGHTS:

- **that Member States have demonstrated their continued commitment to the objectives of the Energy Union, notably through the significant enhancement of their final National Energy and Climate Plans. Further efforts are still necessary to fulfil the five dimensions of the Energy Union and to ensure the full implementation of the 2030 framework;**
- that Russia's war of aggression against Ukraine has resulted in large scale destruction of the Ukrainian energy system. Continued support from the EU and the Member States is required to stabilise energy supplies to Ukraine, **strengthen increase** resilience and **improve** nuclear safety **and security. Coordinated international effort is needed to support reconstruction, and decentralisation and decarbonisation of Ukrainian** energy systems, in particular through in kind and financial support, and through structural assistance in transforming the Ukrainian energy sector and legal system by means of accelerated regulatory alignment with the EU with a view to achieving closer energy integration and **taking into account Ukraine's status as a candidate country** negotiating accession to the EU;
- that the Council **takes note of the Comprehensive Strategy for Energy Independence and Resilience of Moldova and** aims to ~~continue providing support to~~ Moldova, which faced an unprecedented gas crisis in the beginning of 2025 and has successfully managed to diversify its energy sources and launch a process of decarbonising its economy and energy sector to increase its resilience, ~~and speed up its modernisation~~ **and facilitate regulatory alignment with the EU;**
- the integration of the Baltic States into the European Continental System on 9 February 2025 while REITERATING that the successful integration with the EU internal energy market contributes to security of supply not only in the Baltic Sea region but in the entire EU, and that this will further strengthen the integration of renewable energy in the EU system;

- the role of Union's enhanced energy cooperation with Energy Community Contracting Parties focusing on security of supply, diversification of routes and sources, and energy transition and NOTES that 2025 marks 20th anniversary of the signature of the Energy Community Treaty in Athens.

CALLS ON the Commission to:

- continue its work towards fully phasing out energy ~~fuel~~-supplies from unreliable suppliers in the spirit of Versailles declaration from March 2022 and to reinforce efforts to achieve a fully integrated and interconnected energy market;
- continue its work towards the completion of the Energy Union, in particular by facilitating the swift implementation of the adopted legislation, including the Governance Regulation, and ensuring the prompt and effective execution of the measures and initiatives set out in the Action Plan for Affordable Energy;
- put forward, by the end of June 2025, the proposals referred to in the Roadmap towards ending Russian energy imports;
- speedily assess which parts of the existing energy acquis may be subject to simplification under the Omnibus programme, while ensuring stability and predictability in the EU regulatory framework;
- present, at the latest by the last quarter of 2025, a comprehensive package of solutions aimed at expanding, strengthening, modernising, making more efficient and digitalising the EU energy transmission and distribution infrastructure which will allow for the continued transformation of EU energy systems with a view to reaching climate neutrality in 2050 and achieving a genuine Energy Union that delivers competitiveness, affordability and security for all Europeans, by putting forward a European Grids Package consisting of legislative proposals and non-legislative measures to, inter alia, simplify EU rules on grids, strengthen cross-border, ~~offshore~~ and distribution planning ~~and coordination~~ to better look into flexible demand, integrate EU and regional needs, ensure the delivery of projects, and ~~support~~ develop an effective and fair cost-sharing mechanisms (e.g. for cross-border projects), for an optimised energy system. ~~for key cross-border projects of common interest~~;

Commented [A4]: Wording of Action Plan for Affordable energy prices

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- put forward legislative proposals to accelerate permitting for energy infrastructure, storage and renewables, including streamlining environmental assessments and reducing permitting deadlines for an accelerated energy transition as part of the European Grids Package as indicated in the Action Plan for Affordable Energy;
 - assess the financing needs for existing and new energy infrastructure projects, with a special focus on removing infrastructure bottlenecks, **the necessary expansion of offshore infrastructure** and strengthening the security, ~~and~~ resilience **and repair capacities with respect to** ~~of~~ energy infrastructure **and supply chains**, in cooperation with NATO and likeminded third countries, against potential physical and cyber-attacks, both on land and at sea, and present its assessment to the Council and address the findings through upcoming legislative proposals including the European Grids Package;
 - improve the conditions for investing in energy generation in Europe so as to allow for all clean energy technologies to contribute to the process of transformation and decarbonisation of the EU energy mix, **e.g. by stronger coordination of investment strategies in clean technologies among Member States;**
 - analyse and, **if needed**, present to the Council in ~~the first quarter of~~ **[2026]** initiatives and instruments aimed at increasing energy efficiency **and electrification** and at providing further incentives for energy savings in order to support the Member States in the implementation of existing legislation;
 - strengthen the cybersecurity architecture of the European energy system, with a particular focus on enhancing the resilience of **energy consumers, producers,** transmission and distribution networks, in particular through improved coordination between Member States and the Union, deployment of advanced IT-based management tools, real-time monitoring, and early warning;
 - **continue its efforts to diversify energy supplies including hydrogen and to strengthen and diversify global supply chains of clean energy technologies and critical raw materials, while aiming via EU energy diplomacy to accelerate a global energy transition that is just, inclusive and leaves no one behind, promoting energy efficiency, renewable technologies and well-functioning global markets**
 - **present** a comprehensive review of the current EU energy security regulatory framework by the end of the first quarter of 2026 **taking into account lessons learned from the energy crisis by taking due account of the importance of gas savings during a gas shortage, the need to ensure preparedness for long term supply shocks including additional protection to crucial industries and simplifying the solidarity mechanism –**

Commented [A5]: Better coordination of investment strategies in clean technologies among Member States can improve the efficiency of capacity building of manufacturing in the Union, by making the most of each country's strengths and avoiding uncoordinated actions or counterproductive competition within the EU.

Commented [A6]: We support the call on the Commission to present a comprehensive review of the current EU energy security framework and would like to add more detailed language concerning the revision of the framework for security of gas supply.

and properly evaluating and reconsidering the current gas storage targets.

- **Placeholder for additional wording on energy infrastructure**
- put forward guidance on the design of tariff methodologies for network charges to incentivise the use of flexibility and investments in electrification, while ensuring a level playing field and striving for a harmonized approach to address high grid costs by the use of public budgets and the reallocation of grid costs including criteria for a fair intergenerational distribution of grid costs.

Commented [A7]: We are positive towards adding additional wording on energy infrastructure.