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Decarbonization by Regulation, Security by LNG: Policy Coherence in the EU Energy Transition after 2022

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Summary

* *The EU's response to the 2022 energy shock did not resolve the tension between decarbonization and energy security so much as to manage it. The EU preserved its climate ambitions while increasing Liquefied Natural Gas (LNG) imports, especially from the United States and Qatar, thereby stabilizing supply but not eliminating external dependence. The result is a delicate form of policy coherence shaped by regulatory decarbonization, crisis management, and uneven member-state strategies.*

Background/Challenges

- The EU entered the post-2022 period with a strong decarbonization architecture, including legally embedded climate targets and an extensive regulatory framework for the net-zero transition. However, the Russian invasion of Ukraine forced the EU to rapidly redesign its energy strategy around supply security and supplier diversification.
- This is not only a climate governance issue but also a multi-level governance problem. EU institutions set broad transition goals, while member states retain substantial authority over energy mixes, supply contracts, and infrastructure decisions, complicating coordinated action.
- The EU's LNG pivot reduced dependence on Russian pipeline gas but simultaneously increased dependence on global LNG markets and external suppliers such as Qatar and the United States. Energy dependence was redistributed rather than eliminated.
- The policy challenge is thus not simply whether the EU is coherent or incoherent. The question is whether the EU can maintain its credibility in decarbonization while relying on transitional fossil fuel imports amid a crisis, geopolitical uncertainty, and differentiated national strategies.

KEY FINDINGS

◊ The EU's post-2022 energy strategy is best understood as a case of **managed policy coherence**. Rather than fully aligning climate and energy goals, the EU has kept them together through sequencing, layering, and the strategic framing of LNG as a temporary bridge.

◊ The European Climate Law keeps the 2050 net-zero goal legally binding, the Fit for 55 package targets a 55% reduction in emissions by 2030, and the Renewable Energy Directive sets a target of 42.5% renewables by 2030. However, these rules do not eliminate **lock-in risks or the lack of political will** to reduce fossil fuel dependence at the national level.

◊ The post-2022 LNG expansion was not only driven by EU-level policy. It was also shaped by **member-state responses**, with some governments pursuing stronger conformity with Green Deal objectives than others. As a result, the EU's external energy strategy has been partly an aggregation of diverging national energy security choices rather than a fully unified supranational design.

◊ The shift away from Russian gas created new vulnerabilities rather than full energy autonomy. Russian gas accounted for 40% of EU gas imports in 2021 but fell to 9% by 2023. Over the same period, LNG's share in the EU supply mix rose from 22% in 2021 to 43% in 2024. Dependence, in other words, was **redistributed rather than eliminated**.

◊ The EU's supplier diversification strategy has relied heavily on U.S. LNG. In 2025, the U.S. supplied 60% of LNG imports, becoming the central supplier in the EU's supply stabilization strategy. This improved short-term resilience but also created a new concentration risk.

KEY FINDINGS (continued)

- Qatar has emerged as an important diversification partner and is currently the EU's third-largest LNG supplier. Its North Field expansion could make it the EU's second-largest supplier after operations begin. However, diversification across external suppliers **does not automatically produce strategic autonomy**, especially when future capacity, supply contracts, and geopolitical conditions remain uncertain.
- The EU's gas import bill reached €315.5 billion in 2022, which was more than 2.5 times the 2021 cost and 8.5 times the 2020 level. Diversifying away from Russian gas required not only geopolitical adjustments but also imposed **significant financial costs and greater exposure to volatile LNG markets**.
- Decoupling from Russian energy is incomplete. Even after the extensive diversification efforts, Russian gas still represented 18% of total EU imports by late 2024, and **EU member states imported more Russian LNG in 2024 than in 2023**. This suggests that crisis management can reduce one dependency while leaving others in place.
- The EU's policy coherence should not be understood as a settled achievement. It is a **fragile and politically constructed outcome** that depends on crisis management, external supply conditions, and the uneven interaction between EU institutions and member states.

Policy Implications

- The EU should treat LNG explicitly as a transitional instrument, not as a durable substitute for structural decarbonization. That means linking LNG procurement and infrastructure decisions to clear transition timelines, compatibility tests, and long-term phase-out goals.
- The EU should strengthen coordination between the EU-level energy strategy and member-state action. Joint purchasing, infrastructure planning, and external energy diplomacy will remain less effective if national governments continue to pursue sharply divergent supply strategies.
- Supplier diversification should not be treated as equivalent to strategic autonomy. Reducing dependence on one dominant supplier while deepening dependence on another leaves the EU exposed to new geopolitical risks. The EU should therefore increase its diversification efforts while accelerating domestic deployment of clean and renewable energy, electrification, and demand reduction.
- The EU should move more decisively to close remaining loopholes around Russian LNG imports. Incomplete decoupling weakens both the EU's strategic credibility and the broader coherence of its post-2022 energy response.
- More broadly, EU policymakers should approach coherence as an ongoing governance task. It depends on managing trade-offs under pressure, not on eliminating all contradictions.

Further Reading

Goldthau, Andreas, and Richard Youngs. 2023. "The EU Energy Crisis and a New Geopolitics of Climate Transition." *Journal of Common Market Studies* 61(1): 115–24. https://doi.org/10.1111/jcms.13539.

Sassi, Francesco. 2025. "The (Un)Intended Consequences of Power: The Global Implications of EU LNG Strategy to Reach Independence from Russian Gas." *Energy Policy* 198: 114494. https://doi.org/10.1016/j.enpol.2025.114494.

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