

## The EU's Phase-Out of Russian Gas: Progress, Risks, and Security Implications

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### Abstract

This article examines the implications of the European Union's recent energy policy developments, with a particular focus on the strategy to phase out Russian gas imports and diversify supply sources. It analyzes the vulnerabilities inherent in the EU's diversification approach, highlighting the introduction of new regulatory measures—most notably Regulation (EU) 2026/261—which establish strict controls to prevent the re-entry of Russian gas through third countries. These measures, including enhanced origin verification requirements, carry significant implications for external suppliers such as Azerbaijan and transit countries like Türkiye.

The analysis identifies a structural dilemma facing the EU: despite diversification efforts, approximately 90% of its gas supply remains externally sourced, exposing the bloc to geopolitical risks, global price volatility, and long-term infrastructure lock-in. While dependence on Russian pipeline gas has declined sharply, the EU has increasingly shifted toward alternative suppliers, particularly liquefied natural gas (LNG) from the United States, which accounted for an estimated 57% of EU LNG imports by 2025. This shift raises critical questions about whether diversification efforts are effectively reducing dependency or merely replacing one dominant supplier with another.

The article argues that the EU's external energy policy must balance short-term energy security with long-term sustainability objectives. It concludes that the success of the EU's energy transition will depend not only on eliminating reliance on Russian gas but also on avoiding the creation of new structural dependencies.

**Keywords:** European Union; Energy policy; Gas diversification; Russian gas; LNG; energy security; Regulation (EU) 2026/261; Azerbaijan; Türkiye; external dependency; energy transition; geopolitical risk

## Introduction

Following the Islamic Revolution in Iran, the European Union increased its reliance on Soviet—later Russian—gas as an alternative supply source. According to data from Gazprom<sup>1</sup>, the Soviet

Union supplied 19.3 billion cubic meters (bcm) of gas to Europe in 1975, up from 6.8 bcm in 1973, during the early expansion of Siberian gas exports.<sup>2</sup> In February 1978, an agreement was concluded to transport 13.6 bcm of Soviet gas to Western Europe via Czechoslovakia, partly to offset reduced supplies from Iran as a result of the revolution, which took place during 1978-1979. Exports then rose to 54.8 bcm by 1980 and reached around 110 bcm by the early 1990s and peaked in 2018-2019 at 170-180 bcm.<sup>3</sup>

Over the following decades, Europe's dependence on Russian gas deepened substantially. By 2021, the EU imported approximately 155 bcm of Russian gas, accounting for about 45% of its total gas imports.

In response to Russia's full-scale invasion of Ukraine in 2022, however, the EU adopted a strategy to gradually phase out Russian energy imports, aiming both to avoid indirectly financing the war effort and to reduce long-term risks to European energy security. Since the start of the war, the European Union's dependence on Russian gas has declined sharply to roughly 12% in 2025.<sup>4</sup>

## Goodbye Russian Pipelines, Hello LNG: Europe's Energy Reset

Recent trade data highlight the dramatic contraction of Russian gas flows to Europe. According to calculations reported by Reuters,<sup>5</sup> Gazprom's pipeline gas exports to Europe fell by 44% in 2025, dropping to roughly 18 bcm — the lowest annual level since the mid-1970s. The decline reflects both the closure of the Ukrainian transit corridor and the European Union's accelerated efforts to phase out Russian energy.

Ukraine's gas transit agreement with Russia expired on 1 January 2025, and Kyiv chose not to renew it. Even before the cutoff, volumes had fallen sharply: as of 1 December 2024, the EU had received less than 14 bcm of Russian gas via Ukraine that year. Transit patterns had already shifted in 2024, when flows were nearly evenly split between Ukrainian and non-Ukrainian

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<sup>1</sup> <https://www.gazprom.com/>

<sup>2</sup> <https://www.reuters.com/business/energy/russias-pipeline-gas-exports-europe-fall-by-44-lowest-decades-2025-12-30/>

<sup>3</sup> <https://www.themoscowtimes.com/2025/12/30/gazproms-gas-exports-to-europe-fall-to-lowest-level-since-early-1970s-a91591>

<sup>4</sup> [https://energy.ec.europa.eu/strategy/repowereu-phase-out-russian-energy-imports\\_en](https://energy.ec.europa.eu/strategy/repowereu-phase-out-russian-energy-imports_en)

<sup>5</sup> <https://www.reuters.com/business/energy/russias-pipeline-gas-exports-europe-fall-by-44-lowest-decades-2025-12-30/>

routes (about 49.3% and 50.7%, respectively), compared with 2021, when roughly 72.6% of Russian gas reached Europe through alternative corridors and 27.4% transited Ukraine.<sup>6</sup>

Russian LNG deliveries to the EU also declined, though more modestly. In 2025, LNG supplies from Russia fell by 5.6%, totaling 20.3 bcm. Taken together, Russia's total gas supply to EU member states amounted to about 38.3 bcm in 2025, ranking it fourth among external suppliers after Norway, the United States, and Algeria.<sup>7</sup>

At the same time, Russian LNG imports have not ceased entirely. According to analysis by the environmental and human rights organization Urgewald,<sup>8</sup> the EU spent an estimated €7.2 billion (approximately USD7.8 billion) on Russian liquefied natural gas (LNG) in 2025.<sup>9</sup> This marked an increase from roughly €6.3 billion in 2024.

Since the start of the Ukraine war, the European Union's efforts to reduce dependence on Russian fossil fuels have produced significant results. The EU has cut its reliance on Russian pipeline gas dramatically, with Russia's share of total EU gas imports falling to roughly 12% in 2025,<sup>10</sup> thanks to diversification efforts, but the current situation creates other risks for the EU.

### **The risk of gas overdependence in the EU**

The European Union remains heavily reliant on imported gas, with around 90% of its supply in 2025 coming from outside the bloc. Pipeline gas — accounting for about 50.9% of total imports — is sourced mainly from Norway, Algeria, Libya, Azerbaijan, Russia, and the United Kingdom. The remaining 49.1% consists of liquefied natural gas (LNG) imports.

As Russian volumes declined, the European Union accelerated its shift toward alternative suppliers, significantly reducing imports of Russian pipeline gas while increasing LNG purchases, particularly from the United States. This strategy has delivered measurable results and strengthened short-term supply security. However, the transition also introduces a new energy security challenge: instead of achieving full diversification, the EU risks replacing dependence on Russia with a different form of reliance on a narrower group of external suppliers.

According new report from the Institute for Energy Economics & Financial Analysis (IEEFA)<sup>11</sup> EU imports of US LNG rose from 21bcm in 2021 to an estimated 81bcm in 2025, an almost fourfold

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<sup>6</sup> <https://www.aljazeera.com/news/2025/1/1/russian-gas-flow-to-europe-via-ukraine-stopped-who-does-it-hurt>

<sup>7</sup> <https://tass.com/economy/2083375>

<sup>8</sup> <https://www.urgewald.org/en/media/2025-eu-imports-kremlins-flagship-yamal-lng-project-hit-eu72-billion>

<sup>9</sup> <https://appliedgeopolitics.com/blog/european-union-russian-gas>

<sup>10</sup> [https://energy.ec.europa.eu/strategy/repowereu-phase-out-russian-energy-imports\\_en](https://energy.ec.europa.eu/strategy/repowereu-phase-out-russian-energy-imports_en)

<sup>11</sup> <https://ieefa.org/resources/eu-risks-new-energy-dependence-us-could-supply-80-its-lng-imports-2030>

increase. This means that EU countries sourced 57% of their LNG imports from the US in 2025. Thirteen EU countries imported US LNG in 2025. The Netherlands, France, Spain, Italy and Germany accounted for 75% of the EU's imports of US LNG last year. The estimated value of these imports was about €28 billion, calculated using daily spot market prices as reflected in Dutch TTF Natural Gas Futures<sup>12</sup> on the date of arrival.

According to pipeline gas and LNG import data compiled by the Institute for Energy Economics and Financial Analysis,<sup>13</sup> Norway was the European Union's largest gas supplier in 2025 (30%), followed by the United States (28.5%) and Russia (12%). Norway supplied approximately 89 bcm of gas to the EU in 2025, compared with 81 bcm from the United States and 37 bcm from Russia. Additional suppliers included Algeria (10.4%), the United Kingdom (3%), Azerbaijan (4%), Qatar (3%), and Libya (0.2%), underscoring the continued external dependence of the EU gas supply mix.

This rapid reorientation of supply has sparked political and civil society debate. As EU ministers move to formally approve the bloc's ban on Russian gas imports, activists from Greenpeace Belgium<sup>14</sup> have warned policymakers not to replace "Putin's gas" with "Trump's gas," arguing that shifting dependence from Russia to the United States risks creating a new form of geopolitical and fossil fuel lock-in rather than delivering long-term energy security and climate alignment.

If the EU fulfills all existing supply agreements for US LNG and if gas demand reduction efforts falter, the bloc could obtain as much as 75–80% of its LNG imports from the United States by 2030, up from about 57% of total LNG import to EU in 2025. Under the same scenario, US supplies could account for roughly 40% of the EU's total gas and LNG imports by 2030, compared with around 27% in 2025.<sup>15</sup>

### **What the Regulation (EU) 2026/261 does: legally binding phase-out of Russian gas**

Regulation (EU) 2026/261, published on 26 January 2026,<sup>16</sup> establishes a Union-wide, legally binding framework to eliminate remaining EU exposure to security and market risks linked to Russian natural gas and to prepare the phase-out of Russian oil. It introduces a stepwise import prohibition on Russian pipeline gas and LNG (including Russian content in LNG mixtures), backed by a prior authorization and traceability regime designed to prevent circumvention.

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<sup>12</sup> <https://www.ice.com/products/27996665/Dutch-TTF-Natural-Gas-Futures/data?marketId=6142642>

<sup>13</sup> <https://ieefa.org/resources/eu-risks-new-energy-dependence-us-could-supply-80-its-lng-imports-2030>

<sup>14</sup> <https://www.greenpeace.org/international/press-release/80883/human-rights-and-energy-eu-must-not-replace-russian-gas-with-us-imports-greenpeace-warns/>

<sup>15</sup> <https://ieefa.org/resources/eu-risks-new-energy-dependence-us-could-supply-80-its-lng-imports-2030>

<sup>16</sup> <https://eur-lex.europa.eu/eli/reg/2026/261/oj/eng>

With this regulation, the EU has now formally committed to a complete ban on Russian LNG imports starting in early 2027. This is the result of decisions announced by the European Commission on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies, and amending Regulation (EU) 2026/261 on 26 January 2026.<sup>17</sup> It was also confirmed in a statement from the European Commission on future action regarding Russian oil on 2 February 2026<sup>18</sup> and earlier agreements reached by the Council in 2025.<sup>19</sup> The measures aim to end pipeline gas imports by 30 September 2027 and to phase out oil imports from the Russian Federation as soon as possible, and no later than the end of 2027.

In the nearer term, the ban on LNG imports under short-term contracts will take effect on 25 April 2026, and short-term pipeline gas supply contracts must be concluded by 17 June 2026.<sup>20</sup> The regulation entered into force on 3 February 2026.<sup>21</sup>

Russian gas enters the European Union market under the name of third countries, and the Regulation makes an effort to address this serious issue. The Regulation states that some parts of the Russian gas transmission infrastructure are directly connected to the Union, and some transit pipelines connecting the Russian Federation with the Union run through third countries without currently having any entry points between the Russian Federation and the Union. It should therefore be presumed that natural gas imported into the Union via borders, interconnectors, or interconnection points between the Russian Federation and the Union, Belarus and the Union or natural gas arriving via pipelines such as TurkStream at the interconnection point Strandzha 2/Malkoclar originates in or is exported, directly or indirectly, from the Russian Federation. Strict controls should apply in situations in which natural gas arriving at these borders, interconnectors, or interconnection points is under a 'transit' procedure through the Russian Federation.

### **Azerbaijan and Türkiye: Strandzha entry points and proof-of-origin controls**

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<sup>17</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600261](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600261)

<sup>18</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600268#document1](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600268#document1)

<sup>19</sup> <https://www.consilium.europa.eu/en/press/press-releases/2025/10/20/council-agrees-its-position-on-rules-to-phase-out-russian-gas-imports-under-repowereu/>

<sup>20</sup> <https://cms-lawnow.com/en/ealerts/2026/01/eu-regulation-banning-imports-of-russian-natural-gas-expected-in-early-2026>

<sup>21</sup> <https://globalsanctions.com/2026/02/eu-regulation-phasing-out-russian-gas-imports-to-eu-enters-into-force-3-feb/>

The Regulation<sup>22</sup> anticipates circumvention through rerouting, blending, or relabeling Russian gas via third countries. It therefore creates presumptions and heightened verification for sensitive interconnection points.

With the Ukrainian transit route closed, TurkStream remains the only active pipeline corridor delivering Russian gas to Europe. In this context, the interconnection point Strandzha 1 between Türkiye and Bulgaria is treated as a sensitive entry point under Regulation (EU) 2026/261. Its sensitivity stems from its proximity—just a few kilometers away—to Strandzha 2/Malkoçlar, the onshore continuation of TurkStream, which transports Russian gas across the Black Sea to Türkiye and onward into south-eastern Europe.

Reuters reports<sup>23</sup> that supplies via TurkStream totaled 1.73 bcm in January 2025, up slightly from 1.57 bcm in the same month a year earlier. Despite this marginal increase, overall Russian pipeline exports to Europe have plunged from 152.4 bcm in 2021 to an estimated 18 bcm in 2025, underscoring the structural scale of the shift.

The interconnection point Strandzha 1 connects the EU to a pipeline system which transports not only gas from the Republic of Azerbaijan or Türkiye, but also significant volumes of gas from the Russian Federation. It should therefore be required to provide unambiguous evidence establishing that the country of production is not the Russian Federation, and sufficient verification time should be granted to authorities to ensure that gas imported via the interconnection point Strandzha 1 does not originate in or is not exported, directly or indirectly, from the Russian Federation. Should other interconnection points be linked, in the future, to pipeline systems transporting significant volumes of Russian gas, the same standard of control should apply.

Furthermore, significant volumes of natural gas could also enter the Union under a ‘transit’ procedure. Since the strict monitoring rules for gas imports such as the prior authorization do not apply to gas crossing the Union under a ‘transit’ procedure or being stored under customs warehousing rules, it is appropriate to provide for specific safeguards in the form of a transit monitoring regime, which enables customs authorities to monitor gas flows under a ‘transit’ procedure in order to ensure that natural gas which crosses the Union under a ‘transit’ procedure is not ultimately entering into free circulation in the Union. Where operators store gas in temporary storage or under a ‘transit’ or customs warehousing procedure under the Union Customs Code, Member States should have appropriate monitoring and enforcement mechanisms in place to ensure that the use of Union storage by third countries does not pose

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<sup>22</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600261](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600261)

<sup>23</sup> <https://www.reuters.com/business/energy/russias-pipeline-gas-exports-europe-jump-10-january-year-2026-02-02/>

any risk to national or regional security of supply and the fulfillment of storage obligations, and provide relevant information to the Commission.

### **What factors led to Azerbaijani gas being considered less reliable as a supply source?**

On 18 July 2022, during the signing of the Memorandum of Understanding on energy cooperation in Baku, European Commission President Ursula von der Leyen characterized<sup>24</sup> Azerbaijan as a “reliable and trustworthy” partner within the EU’s strategy to diversify away from Russian gas. However, three and a half years later, the EU’s newly adopted regulatory framework<sup>25</sup> no longer treats Azerbaijan as an unconditionally reliable source. This shift appears to reflect a confluence of factors, including persistent and widely documented human rights concerns,<sup>26</sup> the conclusion of gas swap arrangements with Russia,<sup>27</sup> limited upstream production growth potential,<sup>28</sup> infrastructure constraints affecting export capacity to Europe,<sup>29</sup> and ongoing allegations that Azerbaijani exports may include rebranded Russian gas.<sup>30</sup> Together, these developments have contributed to increased regulatory scrutiny and the introduction of origin-verification requirements for gas supplies delivered from Azerbaijan to the EU.

Under the proposed regulatory framework, the European Union intends to exempt gas imports from a group of pre-designated “trusted suppliers” —including the United States, Norway, Qatar, the United Kingdom, Algeria, and Nigeria—from enhanced origin-verification procedures, according to a draft European Commission document reported by Reuters.<sup>31</sup> In practical terms, these exporters will be able to supply gas to the EU without prior authorization or molecule-level provenance checks, whereas Azerbaijan will remain subject to mandatory reporting and verification requirements.

The primary objective of the new regime is to prevent the circumvention of the forthcoming Russian gas ban through the re-export or relabeling of Russian volumes via third countries.<sup>32</sup> Suppliers placed on the EU’s “white list” are deemed to present a negligible risk of substitution, either because of the absence of physical interconnections with the Russian gas system or

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<sup>24</sup> [https://ec.europa.eu/commission/presscorner/detail/da/statement\\_22\\_4583](https://ec.europa.eu/commission/presscorner/detail/da/statement_22_4583)

<sup>25</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600261](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600261)

<sup>26</sup> <https://www.hrw.org/world-report/2024/country-chapters/azerbaijan>

<sup>27</sup> <https://eurasianet.org/azerbaijans-russian-gas-deal-raises-uncomfortable-questions-for-europe>

<sup>28</sup> Ibadoghlu, G. (2025). Current State of Azerbaijan's Gas & Oil Cooperation with Europe: Opportunities and Challenges.. <https://nbn-resolving.org/urn:nbn:de:0168-ssoar-106753-2>

<sup>29</sup> Ibadoghlu, G. (2022) What the EU’s new gas deal with Azerbaijan could mean for Europe’s energy security. LSE European Politics and Policy (EUROPP) blog

<sup>30</sup> <https://crudeaccountability.org/bakus-gas-laundromat-a-contradiction-in-brussels-energy-strategy/>

<sup>31</sup> <https://www.reuters.com/sustainability/boards-policy-regulation/eu-exempt-us-qatari-gas-extra-checks-under-its-russian-gas-ban-draft-shows-2026-01-28/>

<sup>32</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600261](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600261)

because of technical and market constraints that render blending implausible. Consequently, they are not required to demonstrate the origin of each shipment.

Although Azerbaijan continues to be characterized as a strategic partner, it has not been granted equivalent treatment. The technical and legal rationale relates to the existence of legacy interconnection infrastructure with Russia—most notably the Mozdok– Shirvanovka– Hajigabul pipeline<sup>33</sup>—and the operation of swap arrangements between SOCAR and Gazprom,<sup>34</sup> which create a non-trivial risk of commingling. Politically, the EU debate has also been shaped by concerns that diversification should not result in substituting one authoritarian supplier with another.<sup>35</sup> As a result, Azerbaijani exporters will be required to provide documentary evidence that gas delivered to the EU originates from specific domestic fields, and EU authorities may mandate audits of transmission routes to verify the absence of Russian molecules within the supply chain.<sup>36</sup> These controls apply both at the Strandzha-1 interconnection between Türkiye and Bulgaria and along the Trans-Adriatic Pipeline (TAP).

To enforce the ban and prevent circumvention, the regulation establishes enhanced monitoring and information-sharing obligations among national authorities, coordinated by the European Commission in cooperation with ACER, the European Public Prosecutor’s Office (EPPO), and the European Anti-Fraud Office (OLAF).<sup>37</sup> Member States will introduce dissuasive penalties for non-compliance, including harmonized maximum fines for legal entities of at least 3.5% of global annual turnover, €40 million, or 300% of the value of the relevant transaction, as well as maximum penalties for natural persons of no less than €2.5 million.<sup>38</sup>

### **Regulatory Reconfiguration and Its Implications for Azerbaijani Exports and Türkiye’s Transit Role**

The introduction of enhanced EU origin-verification requirements is likely to have differentiated effects on Azerbaijan and Türkiye, reflecting their distinct positions within the Southern Gas Corridor (SGC)<sup>39</sup> and the wider regional transit architecture. In 2025, Azerbaijan exported approximately 12.8 bcm of gas to Europe.<sup>40</sup> Under current technical constraints, the Trans Adriatic Pipeline (TAP) can deliver slightly above 11 bcm annually to European markets, implying that any exports beyond this threshold must rely on alternative routes, most notably

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<sup>33</sup> [https://www.gem.wiki/Hajigabul-Shirvanovka-Mozdok\\_Pipeline](https://www.gem.wiki/Hajigabul-Shirvanovka-Mozdok_Pipeline)

<sup>34</sup> <https://interfax.com/newsroom/top-stories/85105/>

<sup>35</sup> <https://www.bild.de/politik/ausland-und-internationales/erste-lieferung-aus-aserbajdschan-da-statt-putin-schickt-jetzt-dieser-schurke-gas-zu-uns-696a37856b40895ba7f6ffa5>

<sup>36</sup> <https://www.consilium.europa.eu/en/press/press-releases/2026/01/26/russian-gas-imports-council-gives-final-greenlight-to-a-stepwise-ban/>

<sup>37</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_25\\_2860](https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2860)

<sup>38</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202600261](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600261)

<sup>39</sup> <https://www.bp.com/en/global/corporate/news-and-insights/energy-in-focus/southern-gas-corridor-special-feature.html>

<sup>40</sup> <https://minenergy.gov.az/en/xeberler-arxivi/00710>

the reverse-flow utilization of the Trans-Balkan corridor via the Strandzha-1/Malkoçlar interconnection.

Since 2021, TAP has served as the principal export route for Azerbaijani gas to the EU, but its capacity remains below the volumes envisaged in the EU–Azerbaijan Memorandum of Understanding. Consequently, Baku has increasingly depended on reverse flows<sup>41</sup> through the Trans-Balkan system since 2023 to accommodate incremental export volumes. ENTSOG data indicate that in 2025 approximately 11 bcm reached Europe via TAP, while around 1.9 bcm entered through the Turkish–Bulgarian interconnection.<sup>42</sup> This diversification of routes, while commercially rational, introduces additional regulatory exposure under the EU’s new provenance regime.

From a technical standpoint, Azerbaijani authorities and local analysts emphasize that gas transported through the core SGC chain—from Shah Deniz field<sup>43</sup> to Sangachal terminal,<sup>44</sup> onward via the South Caucasus Pipeline, TANAP, and TAP—has no physical interconnection with Russian export infrastructure. On this basis, they argue that molecule-level traceability for TAP-delivered volumes should be relatively straightforward and that compliance costs will be limited. However, the regulatory concern arises less from the SGC backbone itself than from system-level substitution effects and from the use of transit corridors that also carry Russian gas.

Although the Mozdok–Hajigabul line used for swap operations does not physically connect to the SGC export stream, the redirection of Russian gas toward domestic consumption can indirectly expand Azerbaijan’s exportable surplus, complicating the attribution of origin in an accounting sense. More significantly, gas entering Bulgaria via the Strandzha-1/Malkoçlar point may share network space with flows originating from TurkStream, creating a non-negligible risk—at least from a regulatory perspective—of commingling that is difficult to verify at the downstream delivery point. This distinction explains why TAP volumes are likely to remain largely unaffected, while Trans-Balkan deliveries will face stricter documentation and potential auditing requirements.

For Azerbaijan, the net impact is therefore expected to be manageable but not neutral. Compliance will entail higher administrative and verification costs, potential delays at interconnection points, and reduced flexibility in portfolio optimization. Nevertheless, given the physical segregation of the SGC system and existing metering infrastructure, Baku is likely to retain access to EU markets, particularly for TAP-based exports. The principal constraint

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<sup>41</sup> Reverse flow refers to gas moving in the opposite direction from the pipeline’s original design. When a gas pipeline that was built to transport gas from point A to point B is technically modified or operationally reconfigured so that gas can instead move from point B to point A, this is referred to as reverse flow.

<sup>42</sup> <https://www.bta.bg/en/news/world/1055973-turkiye-azerbaijan-must-prove-gas-entering-eu-via-bulgaria-is-not-of-russian-or>

<sup>43</sup> [https://www.bp.com/en\\_az/azerbaijan/home/who-we-are/operationsprojects/shahdeniz.html](https://www.bp.com/en_az/azerbaijan/home/who-we-are/operationsprojects/shahdeniz.html)

<sup>44</sup> [https://www.bp.com/en\\_az/azerbaijan/home/who-we-are/operationsprojects/terminals/sangachal\\_terminal.html](https://www.bp.com/en_az/azerbaijan/home/who-we-are/operationsprojects/terminals/sangachal_terminal.html)

remains infrastructural rather than regulatory: without further expansion of TAP and TANAP capacity, Azerbaijan's ability to scale exports in line with political commitments will remain limited.

The implications for Türkiye are more structurally significant. As a major transit state and an aspiring regional gas hub, Türkiye benefits financially from the throughput of multiple pipeline systems, including TurkStream. Turkish gas demand is projected to remain in the 58–60 bcm range in 2026, with Russia continuing to account for the largest share of imports. The EU's prohibition on Russian gas, combined with stringent origin-verification requirements for volumes transiting via Turkish interconnection points, directly undermines Ankara's strategy of re-exporting Russian gas to European markets. A sustained decline in TurkStream flows toward EU destinations would translate into reduced transit revenues, underutilization of pipeline capacity, and diminished hub liquidity.

In 2025, 16.8 bcm of Russian gas reached Hungary, Slovakia, and Serbia via TurkStream, with daily flows operating near technical capacity.<sup>45</sup> The new EU regulatory framework, by constraining the admissibility of such volumes and imposing provenance checks at entry points, effectively limits the commercial viability of onward sales into the EU. In this sense, the rules not only target Russian supply but also curtail intermediary trading models that rely on jurisdictional relabeling. For Türkiye, the economic consequence is the prospective loss of transit fees and a setback to its ambition to function as a price-setting regional gas hub.

In summary, the EU's origin-verification regime is likely to produce asymmetric outcomes: Azerbaijan will face increased compliance obligations primarily affecting non-TAP routes, while Türkiye confronts a more fundamental challenge to its transit-based revenue model and hub strategy, particularly where these depend on the re-export of Russian gas.

## Conclusion

A central objective of the European Commission's external energy policy is the complete elimination of dependence on Russian natural gas, including the prevention of indirect market entry through relabeling or intermediary transit routes. Concerns regarding potential circumvention have been raised by civil society organizations, most notably Crude Accountability,<sup>46</sup> whose analytical work highlights perceived risks associated with gas flows reaching the EU via Bulgaria from Azerbaijan and Türkiye. These assessments combine volumetric analysis, infrastructure mapping, and contractual scrutiny to question the traceability of certain supply chains.

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<sup>45</sup> <https://www.spglobal.com/energy/en/news-research/latest-news/natural-gas/020226-russian-gas-flows-to-europe-via-turkstream-remain-at-sustained-high-in-jan>

<sup>46</sup> <https://crudeaccountability.org/wp-content/uploads/analysis-policy-implications-of-azerbaijan-energy-strategy.pdf>

At the same time, the EU's progressive disengagement from Russian gas—following its earlier exclusion of Iranian supplies—has increased reliance on alternative external suppliers, particularly LNG imports from the United States and pipeline and LNG deliveries from other non-EU producers. This shift generates a new set of strategic trade-offs, including exposure to global LNG price volatility, infrastructure lock-in risks, and political criticism that diversification may entail substituting one group of authoritarian suppliers for another rather than achieving genuine energy sovereignty.

Given the EU's structurally limited domestic hydrocarbon resource base, long-term energy security is therefore more plausibly anchored in demand reduction and decarbonization than in the reconfiguration of fossil import portfolios. System-level modeling indicates that full implementation of the energy transition—combined with measures under the Action Plan for Affordable Energy and targeted electrification and low-carbon substitution in energy-intensive sectors such as fertilizers—could displace up to 100 bcm of natural gas demand by 2030.<sup>47</sup> Under this pathway, the Union could satisfy a substantially larger share of its energy needs without expanding gas import infrastructure, while aggregate gas consumption would decline sufficiently to reduce combined pipeline and LNG imports by approximately one quarter between 2024 and 2030.<sup>48</sup>

The European Commission's climate framework commits the EU to reducing net greenhouse gas emissions by at least 55% by 2030 and by 90% by 2040 relative to 1990 levels.<sup>49</sup> These targets imply a structural decline in natural gas demand over the medium to long term.

According to Ember's assessment<sup>50</sup> of EU Member States' national energy and climate plans, EU gas consumption is projected to fall from 326 billion cubic meters (bcm) in 2023 to 302 bcm by 2030, representing a 7% reduction.

Looking further ahead, European Commission impact assessments<sup>51</sup>—corroborated by analysis from Zero Carbon Analytics—indicate a much steeper decline by 2040. EU gas demand is projected to fall by roughly 66–67% compared with 2023/2024 levels, reflecting accelerated electrification, energy efficiency gains, renewable deployment, and the substitution of fossil gas in industry and heating.

This structural demand compression underscores that the durability of EU energy security will depend less on identifying new long-term gas suppliers and more on accelerating electrification, renewable deployment, efficiency gains, and the development of low-carbon fuels.

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<sup>47</sup> <https://ieefa.org/resources/eu-gas-imports-fall-25-2030-demand-reduction-target-exceeded-once-again>

<sup>48</sup> *ibid*

<sup>49</sup> [https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2040-climate-target\\_en](https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2040-climate-target_en)

<sup>50</sup> <https://ember-energy.org/latest-updates/eu-gas-demand-set-to-drop-7-by-2030-making-new-gas-investments-risky/>

<sup>51</sup> <https://zerocarbon-analytics.org/insights/briefings/new-us-lng-not-needed-by-eu-to-replace-russian-gas/>

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