



Joint Letter on the up-coming ‘Recommendation on Electricity Taxes and Levies’

Dear Mr. Schellekens, dear Mr. Lopez-Nicolas Baza,

We are writing in response to the draft Commission Recommendation on electricity taxes and levies pursuant to the Action Plan for Affordable Energy. During the stakeholder workshop on electricity taxes and levies on 14 January 2026, several representatives from energy-intensive industries and the heating sector, including those representing household heating, raised concerns about the possibility that the Commission might recommend to shift taxation from electricity to natural gas. Commission representatives reassured stakeholders on multiple occasions that this was **not** the objective of the forthcoming Recommendation.

To our surprise, however, the draft document on two occasions seems to suggest that Member States should consider transferring costs onto fossil fuel users or arbitrarily “raising fiscal contributions on the use of fossil fuels” (Article 5(1) and Article 6(3)). **These recommendations end up contradicting the assurances provided during the January workshop. They imply socially regressive measures which risk exacerbating the energy cost pressure on EU industry and households (especially most vulnerable consumers).**

The majority of energy consumers rely on multiple energy vectors, in many cases both electricity and gas. For both industry and households, fuel switching entirely from one vector to the other may not be possible, particularly in the short-term— due to lacking infrastructure, feedstock needs, or techno-economic limitations. Because of these limitations, simply shifting the tax burden from electricity to fuels would undermine the competitiveness of European industry and pose a risk particularly to vulnerable households.

Instead, EU policy should structurally deliver electricity costs that boost the international competitiveness of European industry, household affordability, and naturally drive decarbonisation. Within that framework, heating technologies should be able to compete on a level playing field, as technology-neutral carbon pricing gradually drives the EU’s transition to climate-neutrality.

We call on your services to reconsider the draft recommendations on electricity taxes and levies under the Action Plan for Affordable Energy, by removing any suggestions that Member States could compensate for lower budget revenues by shifting taxes from electricity to natural gas.

Thank you for your consideration,

The undersigned:

Cefic	EHI
Cepi	FertilisersEurope
Cerame-Unie	IFIEC
COGEN Europe	