



EASE Reply to the European Commission Public Consultation on the 2030 Climate Target Plan

June 2020





Introduction

Global warming is happening and affecting citizens while threatening our long-term sustainability on this planet. The average temperature of our planet has already increased by 1°C and the world is currently not on track to achieve the Paris Agreement objective of limiting temperature change below 2°C, let alone 1.5°C. The 2018 special report of the Intergovernmental Panel on Climate Change on 1.5°C indicated that already at 2°C the world would see dramatic and potentially irreversible impacts due to climate change.

Science is also clear on the close link and interdependence of climate change and biodiversity loss. The EU has taken global leadership in tackling climate change and actively pursues policies to cut its greenhouse gas emissions and to decouple these from economic growth. This allows the EU to modernise its economy and energy system, making them sustainable in the long term and to improve energy security and the health of its citizens by reduced air pollution.

The EU has already adopted climate and energy legislation to reduce greenhouse gas emissions by at least 40% by 2030 compared to 1990 levels. Furthermore, it adopted ambitious energy efficiency and renewable energy legislation, whose full implementation is estimated to reduce greenhouse gas emissions beyond the existing target – by around 45% by 2030. As part of this legislation, Member States develop National Energy and Climate Plans to ensure that common EU objectives will be met. Unless complemented by further policies, the agreed legislation is expected to lead to around 60% greenhouse gas emissions reductions by 2050. In 2018, the Commission proposed for the EU to become climate neutral by 2050 compensating any remaining GHG emissions by absorptions. The European Parliament and the European Council endorsed this objective in 2019. The Commission has proposed to enshrine this objective in the European Climate Law.

According to the latest Eurobarometer survey, 93% of EU citizens see climate change as a serious problem and a significant majority of the EU population wants to see increased action on climate change. As a reflection of this and due to the urgency of the climate and linked ecological challenges, the European Commission has proposed in December 2019 a European Green Deal as one of its priorities including a list of forthcoming proposals to deliver it. The Green Deal aims, among others, to align all EU policies with the 2050 climate neutrality objective, sending an early and predictable signal to all sectors and actors to plan for the transformation.

As part of the Green Deal, the Commission intends to propose to increase the EU's 2030 target for greenhouse gas emission reductions to at least -50% and towards -55% compared to 1990 levels, in a responsible way. The Commission will thoroughly assess the feasibility and the social, economic and environmental impacts of increasing the 2030 target. This assessment will look into how to increase ambition in a way that enhances EU competitiveness, ensures social fairness and access to EASE Reply to EC Consultation on 2030 Climate Target Plan

Page 2 of 32





secure, affordable and sustainable energy and other material resources, benefits citizens and reverses biodiversity loss and environmental degradation.

The Commission intends to present a comprehensive plan to increase the EU 2030 climate target in the third quarter of 2020. Building on the existing 2030 legislation and the upcoming comprehensive plan, the Commission will review and propose to revise, where necessary, the key relevant energy and climate legislation by June 2021. This will include a coherent set of changes to the existing 2030 climate, energy and transport framework, notably related to the EU Emissions Trading System Directive, the Effort Sharing Regulation and the Land Use, Land Use Change and Forestry Regulation, CO₂ Emissions Performance Standards for Cars and Vans and, as appropriate, the Renewable Energy Directive and the Energy Efficiency Directive.

This public consultation invites citizens and organisations to contribute to the assessment of how to increase the EU 2030 emission reduction ambition in a responsible way. Please note that relevant questions and topics may also be covered under other public consultations such as for instance the Strategy on Sustainable and Smart Mobility, the EU Adaptation Strategy, the "Farm to Fork" Strategy, the Action Plan to implement the European Pillar of Social Rights, the Targeted Consultation for the Evaluation of the Guidelines on State aid for Environmental protection and Energy 2014–2020.

Overview of the Questionnaire

The first part of the questionnaire focusses on the overall climate ambition and how actions in the energy sector and other sectors can contribute. The second part is more technical in nature, investigating options on how to improve the design of specific EU policies and may require more expert knowledge.

The first part of the questionnaire seeks the opinion on:

- The overall EU climate ambition for 2030 and opportunities and challenges associated with it (Section 1)
- Sectoral potential in the energy sector as well as other sectors to reduce greenhouse gas emissions by 2030 and the instruments and actions to achieve this (Section 2)
- The wider enabling conditions and related policies needed to foster greenhouse gas emission reductions (Section 3)

The second part of the questionnaire is more technical and focuses on the design of EU policies. As such it seeks for opinions on:

- The design of specific climate and energy policies (Section 5)
- EU policies and outreach towards third countries on climate change (Section 6)





PART 1

1 Overall climate ambition for 2030, opportunities and challenges

1.1 2030 greenhouse gas emission reduction target for the EU

The EU has set itself a target to reduce greenhouse gas emissions domestically by at least 40% by 2030 compared to 1990, a significant stepping up of annual reductions compared to the reductions achieved over the last 3 decades. The effective implementation of energy efficiency and renewable energy legislation as agreed on the EU level for 2030 is actually estimated to lead to around 45% greenhouse gas emission reductions by 2030.

With the recently agreed EU objective of achieving climate neutrality by 2050 and with climate and environmental action towards zero pollution increasingly recognised as urgent, what should be the EU's 2030 target to reduce greenhouse gas domestically?

| $\ \square$ It should remain unchanged with a target to reduce greenhouse gas emissions in the EU by |
|--|
| at least 40% compared to 1990 levels. |
| ☐ It should be increased to at least 50% |

☑ It should be increased to at least 55%

1.2 Opportunities and challenges associated with an increased level of climate ambition in 2030

Which of the opportunities in the list below would you consider as most relevant for the undertaking of a higher climate ambition by 2030. (Multiple options are possible.)

| oxtimes It will be a chance to do our part in saving the planet and thus fulfilling our duty towards the future generations. |
|--|
| \square It will allow a more gradual pathway to reaching a climate neutral EU by 2050 |
| oxtimes It will help mitigate costs associated with climate change to the society (from e.g. extreme weather events, droughts, loss of ecosystems etc.) |
| \square It will ensure a growing EU economy based on new production and consumption models (e.g. circular economy approach) |
| \square It will reinforce EU leadership and inspire action to battle climate change globally |
| ☑ It will create new (green) jobs, including those that are difficult to outsource outside the EU (e.g. maintenance of renewable energy installations, construction) |





| increase the well-being of citizens. | |
|--|---------------------------------|
| ☑ It will give the EU industry a first-mover advantage on globa | l markets |
| ☑ It will improve energy security and reduce the EU dependent | cy on imported fossil fuels |
| ☑ Other (please specify in answer box) | |
| Please specify: | |
| ncreased climate ambition should strengthen investor confidence, allo esources for the energy transition. This is important given the econo andemic; a higher 2030 target sends a strong message regarding ecovery. | mic impacts of the COVID-19 |
| 300 character(s) maximum | |
| Which of the challenges in the list below would you consider as most rands higher climate ambition by 2030? (Multiple options are possible.) | relevant for the undertaking of |
| ☐ It will represent a significant investment challenge for EU inc energy sectors. The costs of investments are likely to be passe prices or taxes | • |
| ☐ It will likely lead to a structural shift and changing skill required particular leading to a decline of sectors and jobs linked to foss intensive manufacturing | |
| ☑ It will change the existing policy and will confront us with reason and implementing additional measures and for the economic as | _ |
| ☐ The simultaneous transition to climate neutral, circular and may lead to significant labour reallocation across sectors. Businesses, especially SMEs could face challenges in re-skill workforce | s, occupations and regions. |
| ☐ It may lead to societal inequalities due to an initially his sustainable food and transport and renewable energy, which mincome people/regions and contribute to energy poverty | |
| ☑ Even with a more ambitious 2030 target, it is difficult to ens greenhouse gas emissions on the ground | ure sufficient action to reduce |
| \Box The EU, if acting alone, will lose out in terms of international | l competitiveness |
| ASE Reply to EC Consultation on 2030 Climate Target Plan | Page 5 of 32 |

☑ It will lower pollution, improve health, make cities and buildings more liveable and thus





| ☐ Other (please : | specify i | n answe | r box) | | | | | | |
|---|-------------|-------------|----------|----------|-----------|-----------|-----------|---------|---------------|
| Please specify: | | | | | | | | | |
| It will represent a signific sectors, but that will like | | | _ | - | | ustry, se | rvices, t | ranspor | t, and energy |
| 300 character(s) maximu | ım | | | | | | | | |
| 1.3 Balance of opportu | ınities a | and cha | llenges | | | | | | |
| For the opportunities and opportunities would out activity (organisations/activity) | weigh th | he challe | enges in | | | - | - | | |
| ⊠ Agree | | | | | | | | | |
| ☐ <i>Disagree</i> | | | | | | | | | |
| ☐ Do not know/ 2 Sectoral Action and I | | | • | | ıse Gas | Emissi | ons by | 2030 | |
| 2.1 Importance of con | tributio | ns by s | ectors | | | | | | |
| Please prioritise the sec | tors whe | ere you | conside | r most e | efforts t | o reduc | e greeni | house g | as emissions |
| and increase absorption reduction target for 203 | | ecessary | in the | perspec | tive of | increase | ed greer | nhouse | gas emission |
| Prioritise from 1 (| most in | nportant | to 8 (le | east imp | ortant). | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | |
| Services (including ICT) | | | | | | | | | - |
| Buildings | | \boxtimes | | | | | | | - |
| Industry | | \boxtimes | | | | | | | - |
| Mobility/Transport | \boxtimes | | | | | | | | - |

EASE Reply to EC Consultation on 2030 Climate Target Plan

Energy supply

 \boxtimes





| Agriculture | | | \boxtimes | | |
|------------------|--|--|-------------|-------------|-------------|
| Forestry | | | | \boxtimes | |
| Waste management | | | | | \boxtimes |

2.2 Energy System

Energy production and consumption remain largely based on fossil fuels and represent more than 75% of the EU's greenhouse gas emissions. To achieve climate neutrality by 2050, this will need to change profoundly.

In your opinion, if the EU is to achieve a higher 2030 greenhouse gas emission reduction target, what would be the main drivers of the necessary energy transition by 2030?

| Multiple options are possible. |
|--|
| ☐ Higher energy efficiency |
| ☐ Higher penetration of renewable energy |
| ☐ Use of nuclear energy for power generation |
| ⊠ Electrification of final energy use |
| |
| ☐ More limited role of natural gas |
| ☑ Better sector coupling between gas and electricity sectors |
| ☐ Use of carbon capture and use technologies |
| \Box Use of carbon-neutral energy carriers such as green/blue hydrogen, biomethane, e-gas or e-fuels |
| ☐ Reduced need for energy thanks to life-style changes (e.g. using active modes of transport, circular economy approaches) |
| ☐ Do not know/Do not have an opinion |

2.3 Renewable energy ambition

In the existing legislation, the EU level target is to have at least 32% share of renewable energy in the final energy consumption in 2030. The costs of renewable energy technologies have significantly declined over the past years.





In your view, what would be the required EU ambition for renewable energy in 2030 to contribute to the EU 2030 greenhouse gas emission reduction target (that you indicated in question 1.1) and to the EU long-term objective to achieve a climate neutrality by 2050?

| \square Achieve at least a share of 32% renewable energy in the final energy consumption by 2030, i.e. unchanged from the level already agreed | on in the EU |
|--|--------------|
| \square Achieve at least a share of 35% renewable energy in the final energy consumption by 2030 | on in the EU |
| \square Achieve at least a share of 40% renewable energy in the final energy consumption by 2030 | on in the EU |
| oxtimes Achieve even higher level of ambition than at least a share of 40% renewable enfinal energy consumption in the EU by 2030 | ergy in the |
| ☐ Do not know/Do not have an opinion | |

2.4 Energy Efficiency ambition

In the existing legislation, the EU level target is to have at least 32.5% energy efficiency in 2030[1] in both primary and final energy consumption and the EU is committed to the "energy efficiency first" principle[2].

[1] Compared to 2007 Baseline.

[2] 'Energy efficiency first' means taking utmost account in energy planning, and in policy and investment decisions, of alternative costefficient energy efficiency measures to make energy demand and energy supply more efficient, in particular by means of cost-effective enduse

energy savings, demand response initiatives and more efficient conversion, transmission and distribution of energy, whilst still achieving the objectives of those decisions (Regulation (EU) 2018/1999).

In your view, what would be the required EU ambition for energy efficiency in 2030 to contribute to the EU 2030 greenhouse gas emission reduction target (that you indicated in question 1.1) and to the EU long-term objective to achieve a climate neutrality by 2050?

| ☐ Achieve at least 32.5% energy efficiency (in both primary and final energy consumption) by |
|--|
| 2030, i.e. unchanged from the level already agreed |
| ⊠ Achieve at least 35% energy efficiency (in both primary and final energy consumption) by |
| 2030 |

☐ Achieve at least 40% energy efficiency (in both primary and final energy consumption) by 2030





| ☐ Achieve even higher level of ambition than at least 40% energy efficiency (in both primary |
|--|
| and final energy consumption) by 2030 |
| ☐ Do not know/Do not have an opinion |
| ole of Fossil Fuels |

2.5 Role of Fossil Fuels

2.5.1 Solid Fossil Fuels

Solid fossil fuels, such as coal, lignite, peat and oil shale (herein referred to as "solid fossil fuels") have greatly supported the development of our economies since the industrial revolution. At the same time, these fuels result in high greenhouse gas and other polluting emissions. Their use without abating their emissions is thus not compatible with the EU's 2050 climate neutrality objective.

In your opinion, how can this be addressed in addition to the existing legislation and greenhouse gas emission reduction targets for 2030 and 2050?

| \square No further public intervention is needed in addition to existing framework |
|--|
| \square Regulate on the national level, by imposing a phase out of solid fossil fuels in power generation by a certain date |
| \square Regulate on the national level, by imposing a phase out of solid fossil fuels in heating by a certain date |
| \Box Clearly indicate to consumers that the use of solid fossil fuels in heating is not sustainable |
| oxtimes Give a stronger price signal on EU and national level for fuel switch away from solid fossil fuels (e.g. through carbon taxation or emission trading) |
| \square Phase out of any public support to solid fossil fuel related investments and use. |
| \square Promote clean technologies (such as carbon capture and storage/utilisation), which could allow for the continuation of the consumption of solid fossil fuels |
| ⊠ Promote carbon-neutral power generation and electrification of the final demand (e.g. renewables-based power generation and electric heat pumps and vehicles) |
| ☐ Do not know/Do not have an opinion |

2.5.2 Natural gas

In your view, can natural gas and other gases help the EU energy system decarbonise and contribute to meeting the 2030 greenhouse gas reduction target with a view to achieving the EU long-term objective to achieve climate neutrality by 2050?





| \square Yes, natural gas can help the EU reach the 2030 targets as it is a more climate friendly |
|--|
| alternative to coal or oil in heating, transport and power generation and it is a source of |
| flexibility for an increasingly renewable energy based power system |
| \square Natural gas may have a role as a transition fuel but, at the latest after 2030, it should be |
| increasingly replaced by carbon-neutral alternatives, such as biogas, bio-methane, green |
| hydrogen and e-gas |
| oximes Natural gas is a fossil fuel, its continued use will make it harder to meet the 2030 target |
| and create lock-in effects in the longer term; a focus on energy efficiency and electrification |
| will help reduce demand for natural gas |
| ☐ Do not know/Do not have an opinion |

2.6 Buildings

Buildings today are responsible for 40% of the final energy consumption, including electricity consumption. Buildings also emit 13% of the total greenhouse gas emissions in the EU (34% if including indirect emissions coming from power & district heating generation). Buildings can be decarbonised and their energy performance can be improved through a number of solutions.

2.6.1 Residential buildings - solutions for home owners

For residential buildings, please rate the options below to indicate what you would consider as most relevant solutions towards climate neutral homes for home owners.

Rating from 5 (very relevant) to 1 (little relevant). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|-------------|---|-------------|
| Replace the current heating & cooling system by a more efficient one (e.g. replace a gas boiler by a heat pump) | | | | | \boxtimes |
| Replace old or inefficient heating equipment using bioenergy, solid or liquid fossil fuels | | | | | |
| Use renewable energy on-site (e.g. biomass, solar thermal, PV panels, geothermal) or off-site through district heating/cooling networks | | | | | × |
| Improve the thermal properties of the building's envelope through better insulation and windows | | | \boxtimes | | |





| Use smart technologies (e.g. building automation and control systems, room temperature controls, smart meters) | | | × | |
|--|--|-------------|---|--|
| Use more energy efficient appliances | | \boxtimes | | |

<u>2.6.2 Non-residential buildings – solutions for building owners</u>

For non-residential buildings such as offices, shops, hospitals, schools, please rate the options below to indicate what you would consider as most relevant solutions towards climate neutral buildings for building owners.

Rating from 5 (very relevant) to 1 (little relevant). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|-------------|-------------|
| Use of building automation and control systems and smart building technologies | | | | \boxtimes | |
| Improve the thermal properties of the building's envelope through better insulation and windows | | | | \boxtimes | |
| Introduce more energy efficient heating & cooling systems | | | | | |
| Use renewable energy on-site (e.g. biomass, solar thermal, PV panels, geothermal) or off-site through district heating/cooling networks | | | | | \boxtimes |
| Apply energy management systems | | | | \boxtimes | |

2.7 Industry

Industry is responsible for 25% of the final energy consumption and for about 20% of the total greenhouse gas emissions. Significantly reducing their emissions in order to contribute to climate neutrality by 2050 and to meet the zero pollution ambition is a particular challenge, and will require technologies to be tested and deployed at scale within the 2030 timeframe, taking into account the investment cycles in industry.

Please rate the items in the table below to indicate the importance of the technologies and other solutions for the reduction of greenhouse gas emissions in industrial installations, in the 2030 time horizon.





Rating from 5 (very relevant) to 1 (little relevant). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|-------------|-------------|
| Higher energy efficiency of industrial processes | | | | | \boxtimes |
| Electrification of industrial processes | | | | | \boxtimes |
| Use of hydrogen in industrial applications as e.g. fuel, feedstock or reducing agent | | | | \boxtimes | |
| Use of e-fuels in industrial applications | | | | | |
| Use of sustainable biomass as a feedstock (e.g. in the chemicals industry) | | | | | |
| Use of sustainable biomass as a fuel | | | | | |
| Use of carbon capture and storage or carbon capture and use | | | | | |
| Developing a more circular economy where products and materials are more re-used and recycled, developing new business concepts | | | | | |
| Substitution of emissions intensive products by alternative products produced with no or low greenhouse gas emissions | | | | | |

2.8 Mobility: road transport

Please note, the Commission will also launch a relevant public consultation for the Strategy on "Sustainable and Smart Mobility".

Road transport is responsible for around 70% of the EU greenhouse gas emissions in transport and around 20% of total EU emissions. Therefore, it plays an important role in the transition towards a climate neutral economy and any increase of ambition of the 2030 greenhouse gas emission reduction target. The EU has a number of policies in place, such as for instance minimum fuel taxation and targets for 2025 and 2030 to reduce CO2 emissions of new cars, vans and trucks.

In view of climate and environmental challenges, please rate how important it is for EU action to focus on the following areas.

Rating from 5 (very important) to 1 (little important). Not all options need to be rated.





| | 1 | 2 | 3 | 4 | 5 |
|--|---|---|-------------|---|---|
| Increasing the share of more sustainable transport modes (e.g. supporting multimodality, active transport mode such as walking and cycling) | | | | | |
| Improving the efficiency of the whole transport system (e.g. through better traffic management systems) | | | | | |
| Increasing the uptake of clean vehicles such as electric and hydrogen fuelled vehicles (e.g. emission standards) and ensuring their efficient integration into the energy grid | | | | | × |
| Increase the uptake of sustainable alternative fuels (e.g. developing recharging/refuelling infrastructure, blending mandates) | | X | | | |
| Incentivising sustainable consumer choices and low-emission mobility practices (e.g. increased application of the 'polluter-pays' and 'user pays' principles, better consumer information on carbon footprint) | | | | | |
| Increasing investment in sustainable transport infrastructure and solutions (e.g. high-speed rail, inland waterways, recharging and refuelling infrastructure) | | | | | |
| Fostering the deployment of innovative digital solutions in transport | | | \boxtimes | | |
| Improving affordability and accessibility of sustainable transport | | | \boxtimes | | |

EASE Reply to EC Consultation on 2030 Climate Target Plan

EASE – European Association for Storage of Energy

☐ Purchase price of low and zero-emission vehicles

 \boxtimes Availability of recharging/refuelling infrastructure

☐ Availability of vehicles models





| ☐ Insufficient range capacity |
|---|
| ☐ Tax treatment of low and zero-emission vehicles |
| □ Other |
| [The next section, 2.9 Agriculture, Forestry and Land Use, is not relevant for EASE and is therefore not shown in this document.] |
| 3 Enabling conditions and other policies |
| [The next section, 3.1 Consumer Choice, is not relevant for EASE and is therefore not shown in this document.] |
| 3.2 Just transition and employment |
| An ambitious 2030 target for reduction of EU greenhouse gas emissions will represent a transition challenge for the economy as a whole and citizens. It is essential that the costs of this transition are shared. If costs are disproportionate for some groups of society, measures are proposed to alleviate them. Likewise, benefits should be shared by all groups of society. |
| Which type of actions should the EU support in the context of its funding tools under climate policy like the Modernisation Fund under to EU ETS to promote a just and socially balanced transition? |
| ☐ Economic diversification and modernisation away from the use of fossil fuels |
| oxtimes Energy system modernisation focussing on energy efficiency and renewable energies deployment |
| ☑ Re-skilling of workers in greenhouse gas intensive sectors or sectors producing goods that are greenhouse gas intensive |
| \square Social and welfare policies, such as policies addressing energy poverty and supporting labour market transitions |
| □ Other |

3.3 Taxation and carbon pricing: use of revenue

Carbon pricing, while increasing the costs of energy, also offers the possibility to use revenue in a beneficial way. Which of the following would you consider as the most useful way of using proceeds from carbon pricing instrument?

EASE Reply to EC Consultation on 2030 Climate Target Plan





| | ☐ Recycle revenue via reductions in labour taxes (i.e. reform tax systems to make them more employment friendly) |
|-------|---|
| | ☐ Use revenue to compensate low income households, or other vulnerable groups |
| | ☐ Use revenue to support low-income households in the transition process (e.g. targeted subsidies for home insulation and energy efficiency or low-emission mobility) |
| | ☑ Use revenue to finance deployment of green technologies, deployment of low-emissions mobility infrastructure, etc. |
| | ☐ Use revenue to support just-transition process in vulnerable regions |
| 3.4 R | esearch, innovation and deployment |
| emiss | or view, where the government research funding would be most important to achieve deeper ion reductions by 2030 with a view to achieving a climate neutral EU by 2050. Please select at five options. |
| | ☐ Climate science |
| | ☐ Hydrogen economy and fuel cells |
| | ☐ Synthetic fuels |
| | ☐ Circular, zero-carbon industry |
| | ☐ Carbon capture, use and storage technologies |
| | ☐ Energy efficiency |
| | ⊠ Renewable energy |
| | ⊠ Energy storage |
| | ☐ Sustainable and smart mobility |
| | ☐ Smart and sustainable buildings |
| | ☐ Bio-economy, agriculture and forestry, nature-based solutions on land and sea |
| | ☐ Technology integration, infrastructure and digitalisation |
| | ☐ Socio-economic and behavioural research and innovation |





4 Additional information

Are there other key aspects which you did not find reflected in the questions and you would like to comment upon?

1000 character(s) maximum

Section 2.6, which focuses on buildings, mentions energy efficiency and renewables deployment but omits the crucial role of energy storage technologies. Energy storage technologies (e.g. batteries, thermal storage, and others) can help maximise self-consumption of distributed renewables, which can support decarbonisation of energy use in residential and commercial buildings. This is recognised in the Smart Readiness Indicator developed as part of the recast Energy Performance of Buildings Directive. For this reason we believe energy storage should be explicitly considered in all EU policies related to energy performance in buildings.

PART II (for experts)

Please note that you are not obliged to respond to both parts of the questionnaire, and can choose to fill in only one of the two. Also, not all questions in the questionnaire need to be answered.

The questions in the second part of the questionnaire are more policy specific, investigating options on how to improve the design of the existing and any additional climate and energy policies to enable deeper greenhouse gas emission reductions by 2030.

5 Climate and energy policy design

The main climate legislation concerned with an ambition increase is:

- the Emissions Trading System Directive (EU ETS) that regulates large point sources and aviation;
- the Effort Sharing Regulation (ESR), which distributes between Member States greenhouse gas emission reduction efforts in other sectors of the economy such as transport, buildings, small industry, agriculture and waste;
- the Land Use, Land Use Change and Forestry Regulation (LULUCF) that regulates the emissions and absorptions from the natural carbon dioxide sink (soil carbon and biomass) in the EU and
- the CO₂ Emissions Performance Standards for Cars and Vans.

The main energy legislation concerned with a potential ambition increase is the Renewable Energy Directive (RED) and the Energy Efficiency Directive (EED).

Deeper GHG emission cuts by 2030 should also be supported by an appropriate enabling framework and coherent policies in other fields, such as mobility, agriculture, energy taxation etc.

EASE Reply to EC Consultation on 2030 Climate Target Plan





5.1 Role of the different climate policy instruments

The present climate legislation envisages that the sectors covered by the EU Emission Trading System will reduce emissions by 2030 with 43% compared to 2005. For the sectors covered the Effort Sharing Regulation the targets are set at a combined reduction of 30% by 2030 compared to 2005. For the land use sink under the Land Use, Land Use Change and Forestry regulation the objective is to ensure that the EU carbon sink at least performs as well by 2030 as what is planned under current land use practices.

Of these three key pieces of climate legislation which ones would require a substantial increase in ambition in order to allow the EU to achieve greenhouse gas emissions reduction in the range of 50% to 55% by 2030 compared to 1990.

Please rate the items in the table below:

Rating from 5 (in need of a significant ambition increase) to 1 (not important, no increase in climate ambition is needed for this piece of legislation).

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|-------------|-------------|-------------|
| EU Emissions Trading System | | | | | \boxtimes |
| Effort Sharing Regulation | | | | \boxtimes | |
| Land Use, Land Use Change and Forestry Regulation | | | \boxtimes | | |

5.2 EU Emissions Trading System (EU ETS)

In the existing legal framework for 2021 – 2030, the amount of greenhouse gas emissions covered by the EU ETS is set to decline by 2.2% per year during the 2021 – 2030 period. However, to achieve higher ambition, this decline may need to be made steeper or other actions can be contemplated that impact the carbon pricing signal.

The EU ETS ambition can be strengthened through different policy options. How could the EU ETS ambition be best increased in order to effectively contribute to an emission reduction of 50 to 55% by 2030? (Multiple options are possible.)

| Increase | the linear | reduction | factor | and | as such | reduce | faster | the | amount | of | allow | ances |
|--------------|------------|-----------|------------|-----|---------|--------|--------|-----|--------|----|-------|-------|
| available ea | ch year | | | | | | | | | | | |
| | | , | c . | | ,, , | ., | | | | | | |

☐ Increase the linear reduction factor as well as lower the starting point on which the linear reduction factor is applied (i.e. shifting the total allocation downwards)





| ☐ Introduce a pricing policy (e.g. minimum price floor) |
|--|
| ☐ Reduce or eliminate the share of free allocation |
| ☐ Strengthen the Market Stability Reserve rules (e.g. update feed rates) but allow other policies to be the primary drivers to increase greenhouse gas reduction ambition |
| 5.2.1 Addressing carbon leakage risk for energy intensive industry |
| Increased ambition will make the overall ETS allowance budget (the cap) lower, affecting both the budget available for auctioning and free allocation of allowances. Auctioning is the default method for allocating allowances, and free allocation aims to address the carbon leakage risk for energy intensive sectors covered by the EU ETS. Should differences in levels of ambition worldwide persist, as the EU increases its climate ambition, the Commission undertook in the European Green Deal Communication to propose a Carbon Border Adjustment mechanism for selected sectors to reduce the risk of carbon leakage. This measure will be designed to comply with World Trade Organization rules and other international obligations of the EU. |
| If targets are increased to match an overall economy wide ambition of 50% to 55% greenhouse gas reduction by 2030 compared to 1990, and if free allocation to industry is maintained as a tool to address carbon leakage, should the share of free allocation be changed? |
| ☐ The share of free allocation for industry in the ETS cap is allowed to increase |
| ☐ The share of free allocation for industry in the ETS cap should remain at the present level |
| ☐ The share of free allocation for industry in the ETS should decline |
| □ Don't know/Don't have an opinion |
| 5.3 EU emissions trading extension to road transport and buildings |
| 5.3.1 The role of carbon pricing |
| How do you see the role of carbon pricing to reduce emissions in the buildings and road transport sectors? |
| \Box Should be complementary to other sector specific policies, including taxes, duties and charges already in place |
| ☐ Should replace other sector-specific measures |
| ☐ Is not suitable/feasible and other measures should drive emission reductions instead |
| |

☑ Don't know/Don't have an opinion





5.3.2 How to introduce carbon pricing

| preser. |
|--|
| ☐ Proposing a CO₂ tax for these sectors |
| ☐ Include these sectors in an emission trading system and apply auctioning |
| ☑ Don't know/Don't have an opinion |
| 5.3.3 Interlinkage with Effort Sharing Regulation |
| If the EU ETS was extended to energy related emissions from the road transport and buildings sectors should also other energy emissions currently covered by the Effort Sharing Regulation be moved to the EU ETS? |
| □ Yes |
| \square No |
| ☐ Don't know/Don't have an opinion |
| If yes, which of the below sectors: |
| ☐ Energy emissions from small industrial installations |
| ☐ Energy emissions from municipal waste incineration |
| ☐ Energy emissions from other remaining sectors such as agriculture etc. |
| 5.3.4 Harmonisation of carbon pricing for buildings and road transport |
| What is your view on what is the most desirable degree of harmonisation of carbon prices fo buildings and the current EU ETS sectors? |
| ☐ There should be immediately uniform carbon prices across Member States in the building sector by inclusion of the buildings sector in the EU ETS |
| \Box A carbon price should be applied EU-wide in the buildings sector but it should be possible that carbon prices in the buildings sector differ from carbon prices in existing ETS sectors |
| \Box A carbon price for the building sector needs to be set, but Member States should retain the possibility to determine national carbon prices in the buildings sector |
| |

If the EU introduced a carbon price in buildings or the road transport sector, which option would you





| ☐ It is not suitable to apply an EU-wide carbon instruments (taxes, levies etc.) | n price g | iven the | already | existing | national | | | | |
|---|-----------|-----------|-------------|-------------|-----------------|--|--|--|--|
| What is your view on what is the most desirable degree transport and the current EU ETS sectors? | of harmo | onisation | of carbo | on prices | for road | | | | |
| ☐ There should be immediately uniform carbon prices across Member States in the road transport sector by inclusion of the road transport sector in the EU ETS | | | | | | | | | |
| ☐ A carbon price should be applied EU-wide in the road transport sector but it should be possible that carbon prices in the road transport sector differ from carbon prices in existing ETS sectors | | | | | | | | | |
| ☐ A carbon price for the road transport sector needs to be set but Member States should retain the possibility to determine national carbon prices in the transport sector | | | | | | | | | |
| ☐ It is not suitable to apply an EU-wide carbon instruments (taxes, levies etc.) | n price g | iven the | already | existing | national | | | | |
| 5.3.5 Extension of EU emissions trading – opportunities | | | | | | | | | |
| What do you see as opportunities related to the extension buildings and transport? Please rate the below opportimportant role: Rating from 5 (very relevant) to 1 (little relevant). Not all | rtunities | to indic | ate whic | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | | | | |
| Increases economic efficiency | | | \boxtimes | | | | | | |
| Makes renovation and electrification of buildings financially more attractive | | | | | \boxtimes | | | | |
| Electric vehicles and fossil fuelled vehicles face the same carbon price incentive | | | | | \boxtimes | | | | |
| Generates revenues which can be used to facilitate | | | | \boxtimes | | | | | |

5.3.6 Extension of EU emissions trading - challenges

Helps EU to achieve its climate and environmental

transition and compensate lower income households

objectives

 \boxtimes





What do you see as **challenges** related to the extension of EU emissions trading to sectors such as buildings and transport? Please rate the below challenges to indicate which play the most important role:

Rating from 5 (very important) to 1 (little important). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|--|---|---|---|---|---|
| The required level of carbon price signal needed for buildings and road transport actors to reduce emissions | | | | | |
| The resulting impact on the EU ETS price | | | | | |
| Administrative complexity and implementation of robust monitoring, reporting and verification system | | | | | |
| Overlap with existing pricing measures (in particular taxation) in these sectors | | | | | |
| Social acceptability with a view to a just transition | | | | | |
| Political acceptability of introducing a carbon price in these sectors | | | | | |

(The following sections – 5.3.7 How to introduce carbon pricing in the maritime transport sector; 5.3.8 EU ETS and the maritime transport sector – key aspects to consider; 5.4 Role of the Effort Sharing Regulation; and 5.5 Role of the Regulation on Land Use, Land Use Change and Forestry (LULUCF) – are not directly relevant for EASE and we propose not to reply.)

5.6 Role of energy policies

The European Green Deal makes it clear that in case of a higher climate ambition the Commission would need to review and propose to revise, where necessary, the relevant legislation by June 2021.

What are your views on which legislative instruments in the energy field should be revised to contribute to the increased climate ambition for 2030.

| ☐ Energy Efficiency Directive |
|---|
| ⊠ Renewable Energy Directive |
| ☐ Regulation on the Governance of the Energy Union and Climate Action |
| EASE Reply to EC Consultation on 2030 Climate Target Plan |





| ☐ Internal energy market legislation |
|--------------------------------------|
| ☐ Other |
| ☐ No revision needed |

5.6.1 Renewable energy policies

In case of higher ambition (than 32%) for renewable energy, please rate potential action/instruments that could be considered in the list below:

Rating from 5 (very relevant) to 1 (little relevant). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|--|---|---|---|-------------|-------------|
| Stronger enforcement of the existing legislation | | | | \boxtimes | |
| Additional technical and financial support in implementation of the existing legislation | | | | \boxtimes | |
| Additional measures to incentivise a more Europe-wide approach for renewable energy production (e.g. cross-border projects for renewable electricity production) | | | | | |
| Additional measures to increase decentralised renewable energy production (e.g. self-consumption, energy communities) | | | | × | |
| Additional measures to increase renewable electricity production, including development of necessary infrastructure | | | | | \boxtimes |
| Additional measures to increase renewable heat and cold production (both in buildings and in industry) | | | | | |
| Additional measures to increase renewable energy consumption in industry | | | | × | |
| Additional measures to increase renewable energy consumption in buildings | | | | \boxtimes | |
| Additional measures to increase renewable energy consumption in transport | | | | | × |
| Additional measures to ensure that biomass use remains sustainable | | | | | |





| Additional measures to support innovation related to | П | | × | |
|--|---|--|---|--|
| renewable energy production | | | | |

5.6.2 Energy efficiency policies

In case of a higher ambition (than 32.5%) for energy efficiency, please rate potential action/instruments that could be considered in the list below:

Rating from 5 (very relevant) to 1 (little relevant). Not all options need to be rated.

| | 1 | 2 | 3 | 4 | 5 |
|--|---|---|---|-------------|---|
| Stronger enforcement of the existing legislation | | | | × | |
| Additional technical and financial support in implementation of the existing legislation | | | | × | |
| Making the "Energy Efficiency First" principle a compulsory test in relevant legislative, investment and planning decisions | | | | | |
| More stringent energy performance standards for products | | | | | |
| More stringent energy performance requirements for buildings | | | | | × |
| More stringent energy performance requirements for industrial processes, including through process integration and waste heat reuse | | | | × | |
| More stringent energy performance requirements for transport vehicles | | | | | |
| New requirements for agriculture sector and promoting electrification of machinery | | | | | |
| Standards for ICT sector to promote energy efficiency and reuse of waste heat (e.g. though decisions on location and design of data centres) | | | | \boxtimes | |

5.6.3 Renovations





Renovation is a key tool to reduce greenhouse gas emissions from buildings, promote the uptake of renewable energy and improve energy performance.

In your view, how building renovation could be best incentivised?

| Removing administrative barriers preventing energy efficiency and renewable solutions |
|---|
| oxtimes Raising awareness and communicating better the wider benefits of sustainable buildings, notably in terms of costs savings |
| ☐ More frequent and clear information about gas consumption enabled by smart meters to increase consumers' awareness |
| ☐ Better education and training of architects, engineers and workforce to provide quality renovations |
| ⊠ Targets for mandatory renovation in specific sectors, e.g. public buildings, social housing, schools, hospitals |
| ☐ Energy saving obligation schemes |
| ☐ Obligation to go beyond a certain energy performance standard before renting, phasing out the worst-performing buildings |
| ⊠ Financial mechanisms (access to finance and incentives), including schemes directly attached to the property itself, and not to the person renting the building |
| ☑ Promoting one-stop-shops, reducing administrative burden and delays and other approaches to facilitate the "renovation journey", including prefabricating energy efficiency solutions |
| ☐ Giving households right to a free, independent energy audits (e.g. paid by authorities or via an obligation on fossil heating fuel suppliers) |
| ☐ Carbon pricing |
| ☐ Aggregating smaller projects to make the investment more attractive |
| $\ \square$ Working with building portfolio owners in order to shift to climate neutral/low emission buildings |
| ☐ Promoting the use of Energy Performance Contracts and Energy Service Companies |
| ☑ Public sector leading by example (e.g. renting or buying climate neutral/low emission buildings or renovating existing public buildings) |





| | ourage better urban planning, for the construction of sustainable buildings and the shment of existing buildings and promote green infrastructure (e.g. green roofs or valls) |
|------------------|---|
| | rented buildings/apartments, finding new ways to share the costs and benefits of green ns with the landlord |
| disman | ourage construction sector to apply circular approaches, in particular design for easy otling and expansion of life span, apply material efficiency, use low carbon materials oximise recycled/reused content |
| 5.6.4 Barriers t | to renovations |
| In your view, и | what are the main barriers for renovating buildings more frequently and more deeply? |
| ☐ Split | t incentives (different interests of owners and tenants) |
| ⊠ Long | g pay-back periods |
| □ Lack | c of technologies |
| ☐ Lack | of skills in the construction/renovation sector and lack of available workforce |
| | ited offer for packaged and easy to install integrated solutions by local 'one-stop- for building renovation |
| ☐ Hou | seholds' inability or unwillingness to pay for energy audits |
| ☐ Lack | c of information/low awareness amongst consumers |
| ⊠ <i>Lack</i> | c of access to suitable financing solutions |
| ☐ Disc | comfort and trouble related to the works |
| | complex administrative procedures (permits required, high number of contacts and tts needed) |
| □ Poss | sible negative impact on the building aspect |
| □ Lack | of trust in the new technologies and the solutions currently proposed by the market |
| | |

5.7 Energy infrastructure and sector integration

Decarbonisation is leading to an increased focus on the construction of electricity transmission lines as well as the need for more smart grids and local grids to handle increased decentralised electricity





production. Similarly, regarding gas networks, focus will increasingly be on future proofing of gas infrastructure to allow carbon-neutral gas supply.

What do you think should be the priorities for the EU's infrastructure planning in the years ahead to facilitate decarbonisation?

- As long as natural gas demand is strong, the EU should allow public support for the construction of new gas pipelines.
- ⊠ Strike a balance between electricity and gas infrastructure. Electricity cannot cover all energy demand, and thus gas will still be needed, but will have to be decarbonised. Part of the electricity production can be converted into synthetic gas/hydrogen through power-to-gas technologies and transported to demand centres.
- ☑ Put the focus on electricity transmission and smart grids. With the expansion of renewable electricity and the electrification of energy demand, the priority is to expand the electricity network, notably to reap full potential of wind
- □ Natural gas is a fossil fuel and does not contribute to the decarbonisation of the EU's energy system. The construction of new gas infrastructure has a lock-in effect that will lead to continued consumption of the fossil natural gas; the large-scale decarbonisation of gas remains a distant perspective.

5.8 Enabling conditions and polices for industrial transformation

Many industrial players have in their recent industrial roadmaps committed to achieving the objective of a climate-neutral Europe by 2050, though they point out that there are specific enabling conditions, next to a sufficient carbon price signal in the EU Emissions Trading System, that need to be met for them to be able to do so.

Please rate the enabling conditions for the reduction of greenhouse gas emissions in industry, in the 2030 time horizon.

Rating from 5 (very important) to 1 (little important).

| | 1 | 2 | 3 | 4 | 5 |
|--|---|---|---|-------------|---|
| Progressive decarbonisation of energy supply and of industrial feedstock | | | | \boxtimes | |
| Competitive clean energy prices and feedstocks. | | | | | |





| Markets for zero- and low-carbon products via policy intervention (e.g. labelling, public procurement, standards, guarantees of origin) | | | | \boxtimes |
|--|-------------|---|-------------|-------------|
| EU legal and financing framework for infrastructure, networks and grids | | | | × |
| Reduced administrative burdens e.g. faster access to construction and environmental permits | | | \boxtimes | |
| Addressing public perception of some technologies, such as carbon capture and storage (CCS) and carbon capture and use (CCU) | \boxtimes | | | |
| Develop an EU methodology to certify carbon dioxide removal credits at the level of installations for different types of carbon dioxide removals in energy and industry, including use of bioenergy with CCS /mineralisation, air capture with CCS/mineralisation. | × | | | |
| More circular economy, ensuring we re-use and recycle more products and materials in the EU, choose products with smaller environmental and carbon footprint, reduce waste and develop new business concepts for EU industry | | | | |
| Making mandatory the implementation of the recommendations in the energy audits | | × | | |
| Offer SMEs the right to free energy audits or similar support | | × | | |
| Border adjustment mechanism allowing EU industries to decarbonise without risk of "carbon leakage", i.e. production shift to countries with less strict climate regulation | | | | |
| Enhanced focus on joint solutions by the social partners contributing to the achievement of climate-neutrality and to address just transition within the sector | | | | |
| Support instruments providing stable incentives and increased investment certainty such as carbon contracts for difference | | | | |





| Increased coherence of price signals (including taxes, levies, carbon prices) for incentivising clean energy technologies | | | |
|--|--|---|-------------|
| Stronger EU Emissions Trading System price signal | | | \boxtimes |
| Support measures that would allow closing the financing gap for the demonstration and first deployment of innovative low-carbon technologies or products, and seamless combination with other EU funding instruments, such as a strengthened Innovation Fund | | | |
| Secure supply of sustainable raw materials needed for clean technology value chains | | × | |

(The following section - 5.9 Waste Management - is not directly relevant for EASE and we propose not to reply.)

6 EU policies and outreach towards third countries on climate change policy

The threat of climate change requires a decisive and sustained response from all countries, particularly the major emitters. However, the aggregate effect of national climate plans is currently insufficient to keep the world on track to stay below 2°C of global warming, let alone 1.5°C. The EU's share of global emissions is currently at 9% and decreasing.

By the virtue of decades of climate policy implementation, the EU has developed extensive experience and expertise in design and development of regulations, incentives, and evidence-based approaches to drive the transition to low carbon economy. As the rest of the world advances with the implementation of their Paris Agreement goals and targets, the "EU model" of decoupling economic growth from the growth of greenhouse gas emissions has become of particular interest to our partners around the world. The EU should work decisively to use its experience to promote the uptake of ambition at global level, as foreseen in the Green Deal Communication.

At their December 2019 meeting, EU Heads of States and Governments also invited the Commission to propose an update to the EU nationally determined contribution (NDC) under the Paris Agreement in good time before the UN Climate Change Conference in Glasgow in November 2020.

Next to that, the EU is also engaging more actively with partner countries to encourage and support extra efforts that reflect the highest possible ambition considering national circumstances. Solidarity





with the efforts of the poorest and most vulnerable countries to deal with the consequences of climate change is more essential than ever.

In order to lead international negotiations, the EU will need to develop a stronger 'green deal diplomacy' focused on convincing and supporting others to take on their share of promoting more sustainable development. More generally, the EU will use its diplomatic and financial tools to ensure that green alliances are part of its relations with partner countries and regions, considering also the international security implications of climate change.

6.1 Priorities for climate diplomacy

Where do you think the EU should concentrate its climate diplomacy and cooperation efforts in the coming years?

| ☐ Western Balkans, Eastern Europe and Central Asia |
|---|
| ☐ Middle-East and North Africa |
| ☐ Sub-Saharan Africa |
| ☐ North-Atlantic region including the USA |
| Latin America and Caribbean including Brazil |
| ☐ South Asia including India |
| ☐ East Asia including China |
| ☐ South East Asia |
| ☐ Australia, New Zealand and the Pacific Region |
| □ <i>G20/G7</i> |
| ☑ International Financial Institutions (IMF, WB, OECD, etc.) |
| 6.2 Approach for development assistance and climate financing in third countries |
| In terms of development assistance and climate financing in third countries, what approaches would you consider most pertinent? |
| ☐ Building coalitions around adaptation with the most vulnerable countries and regions |
| ☑ Allowing countries with limited energy supply to leapfrog to climate neutral technologies |

Providing support for the development of comprehensive national plans and strategies





| □ Development of low emissions infrastructure |
|---|
| ☐ Supporting just transition |
| ☐ Development of climate compatible land-use practices and nature based solutions |
| ☐ Promoting circular economy and decent supply chains |
| ☐ Development of sustainable finance and investment environments (enabling environments, |
| 6.3 Coherence of climate, trade and other strategic foreign policy instruments |
| Which improvements in the coherence of climate, trade and other strategic foreign policy instruments would be most important to support the EU's low emissions transition priority? |
| ☐ Pursue ambitious external action to encourage other countries to raise their climate ambition to levels similar to the EU's. |
| ☐ Prepare to introduce border measures to avoid carbon leakage in case others don't respond with comparable action |
| ☐ Pursue positive trade cooperation in the context of tariffs, public procurement rules, standards and regulation |
| ☑ Promote green tech/low carbon business dialogues |
| ☐ Enforce the climate provisions of the Trade and Sustainable Development (TSD) chapters of the Free Trade Agreements |
| oxtimes Lead by example and increase the EU's greenhouse emissions target for 2030 to 50% to 55% compared to 1990 |
| ☐ Drive further progress on climate action in other international fora such as ICAO (aviation, and IMO (shipping) |
| ☐ Better address the security implications of climate change |
| ☐ Intensify dialogues at leaders' level |

6.4 Deliverables for the next UN Climate conference (COP26)

In view of EU's international leadership, what deliverables do you consider most important for the next UN Climate conference – the Glasgow COP?





| ☐ Maintaining global momentum and stakeholder engagement in support of the implementation of the Paris Agreement through a signal of commitment to increase global ambition in line with science |
|--|
| ☑ Demonstrating climate efforts by non-state actors |
| ⊠ Submission of ambitious long-term low greenhouse gas emission strategies |
| ☐ Finalisation of the Katowice rulebook to make the Paris Agreement fully operational |
| ☐ Announcement of new headline targets – Nationally Determined Contributions (NDCs) |
| ☐ Reaching agreement on the process to establish the post-2025 climate finance pledge |
| oxtimes Establishing processes to direct private sector funds to sustainable and resilient climate investments |
| ☐ Increasing the share of international climate financing for adaptation and resilience |
| ☐ Making progress under the work programme for Warsaw International Mechanism to address loss and damage associated with impacts of climate change in the most vulnerable developing countries |

7 Additional information

Are there other key aspects which you did not find reflected in the questions and you would like to comment upon?

1000 character(s) maximum

If appropriate, please upload concise position papers or policy briefs that express the position or views of yourself or your organisation.

The maximum file size is 1 MB - Only files of the type pdf,txt,doc,docx,odt,rtf are allowed





About EASE

The European Association for Storage of Energy (EASE) is the leading member-supported association representing organisations active across the entire energy storage value chain. EASE supports the deployment of energy storage to support the cost-effective transition to a resilient, climate-neutral, and secure energy system. EASE was established in 2011 and currently represents almost 50 members including utilities, technology suppliers, research institutes, distribution system operators, and transmission system operators.

For more information please visit www.ease-storage.eu

Disclaimer

This response was elaborated by EASE and reflects a consolidated view of its members from an energy storage point of view. Individual EASE members may adopt different positions on certain topics from their corporate standpoint.

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