



# EASE reply to the European Commission's Public Consultation and Call for Evidence Feedback on the EU Climate Target for 2040

*July 2023*



## INTRODUCTION

The European Commission's Public Consultation on the EU Climate Targets for 2040 aims to gather inputs on the EU's intermediary climate targets for 2040 by 24 June 2023. The Call for Evidence Feedback will inform a detailed impact assessment in view of drafting a law proposal. The EU Climate Law requires the European Commission to propose a 2040 climate target in 2024. The Commission recognises that the 2030 and 2050 targets need to be supported by an intermediary target to improve their chances of being met. The objective is to provide certainty for stakeholders to meet the requirements and inform their strategic and investment decisions in light of a reaffirmed EU commitment to the fight against climate change. With the COP29 of 2025 closing in, European policymakers and Member States are keen to communicate their renewed climate ambitions, and to strengthen the regulatory framework for consistent measures to be implemented towards achieving the EU's climate goals.



## EU SURVEY PUBLIC CONSULTATION QUESTIONNAIRE

*Note: Questions on certain topics were skipped as not relevant for the energy storage sector, outside of EASE scope, or as EASE does not have a position on these issues (“challenges and enabling actions for the EU climate ambition”, “the contribution of individual sectors to the EU’s climate ambition”, “awareness of climate change impact and climate action”, “changes expected for people’s daily lives”, “willingness for action at the individual level”, “incentives for climate action”, “the impacts of the climate crisis”, “mitigation of GHG emissions from the land sector and policy options”, “the role of carbon removals”, “engagement and social impacts”, “adapting to climate change”).*

### 1. General Section 1

#### 1.1. Overall opinion on the EU’s climate ambition for 2040

##### Emissions reduction ambition for 2030–2040

Considering the objective of achieving climate neutrality by 2050 and the current energy crisis, how should the EU pursue the climate transition up to 2040? [Choose one]

- The EU should accelerate the transition to climate neutrality.
- The transition to climate neutrality should continue at the current pace
- The transition should be slower than the current pace.
- The EU’s ambition should depend on other countries’ climate ambition.
- I don’t know.

##### Emissions reduction target for 2040

The EU has committed to reduce its net GHG emissions by 55% compared to 1990 levels by 2030 and aims to achieve climate neutrality by 2050 (–100%).

In your opinion, what should be the net emission reduction target for 2040 to put the EU on track to meeting the 2050 climate neutrality target? [Choose one]

- up to –65% emission reduction (a very low ambition, barely increased compared to the target for 2030).
- between –65% and –75% emission reduction.
- between –75% and –80% emission reduction (following the average trajectory between 2030 and climate neutrality in 2050).
- between –80% and –90% emission reduction.



- more than –90% emission reduction (a very high ambition, close to reaching climate neutrality already in 2040).
- I don't know.

### **Role of carbon removals in the 2040 climate target**

The EU's 2030 climate target is expressed in 'net' emissions, which is the sum of GHG emissions and carbon removals

In your opinion, how should carbon removals be considered so that the EU achieves its 2040 climate target? [Choose one]

- Carbon removals should be considered together with actual GHG emissions. Hence, it is enough to have only a single 'net' emissions target for 2040 to set the GHG trajectory towards climate neutrality by 2050 in a cost-effective way.
- It is better to set a separate target for reducing GHG emissions and another target for carbon removals.
- It is better to have one target for reducing GHG emissions, a target for nature-based carbon removals and a target for industrial removals with permanent storage.
- No opinion / I don't have enough information to make a judgment.

### **Opportunities associated with higher climate ambition**

What are the benefits of an ambitious climate target by 2040? Which opportunities would you consider as most relevant when implementing an ambitious climate target by 2040? [Multiple answers possible]

- It will create green and high added-value jobs, including those that are difficult to outsource outside the EU (e.g. maintenance of renewable energy installations, construction and renovation, bioeconomy).
- It will improve our well-being (by lowering pollution, improving health and creating more liveable cities) and help protect the planet's ecosystems.
- It will improve energy security, reduce the EU's dependency on imported fossil fuels and reduce exposure to volatility in fossil fuel prices.
- It will ensure that we do our part in protecting the planet and fulfilling our duty towards future generations. It will simultaneously address the climate and the biodiversity crises.
- It will reinforce EU leadership and inspire action to combat climate change globally.



- It will improve the competitiveness of the European economy and give EU industry a first-mover advantage on global markets.
- It will give a clear signal that the EU economy will embrace sustainable production and consumption models (e.g. circular and sharing economy approach).
- It will help individuals and businesses lower their energy and climate bills.
- It will help mitigate costs to societies who are likely to suffer from climate change (e.g. from extreme weather events, droughts or loss of ecosystems).

### **Gender aspects of climate policy**

Climate policy and climate action can be seen from many different perspectives. In your view, should more consideration be given to gender aspects in the transition to climate neutrality and in climate and related policies? [Choose one]

- 1 – No, I totally disagree
- 2
- 3
- 4
- 5 – Yes, I totally agree



## 2. Expert Section 1

### 2.1. General Policy Framework

#### Scope and role of EU-wide carbon pricing instruments

In the context of the Fit-for-55 package, the scope of the EU ETS is being extended to cover most of the CO emissions from the use of fossil fuels and industrial processes. How could emissions trading in the EU evolve in a post-2030 policy framework in terms of GHG coverage, sectoral coverage, and relations with non-EU emissions trading schemes?

	1 (totally disagree)	2	3	4	5 (totally agree)	I don't know
EU emissions trading should also cover all non-CO2 GHG emissions from the use of fossil fuels and industrial processes, not only CO2 emissions.				x		
EU emissions trading should also cover GHG emissions from other sectors (e.g. extractive industries or the land sector).			x			
EU emissions trading maintains the obligation to surrender allowances for emissions that are captured and utilised (Carbon Capture Utilisation, 'CCU') in non-permanent products. This aspect of emissions trading should be adapted for sectors with hard-to-abate, residual emissions and for sectors that require a carbon feedstock (e.g. chemicals, pulp and paper) in order to promote carbon circularity.						x
Options to link the EU ETS with other compliance carbon markets should be pursued, provided that the environmental integrity, potential cost-efficiency gains and more		x				



options for emissions abatement are carefully assessed.						
EU emissions trading should cover all fossil fuel uses, including those that are so far not or not entirely covered, e.g. in the non-road transport sector.					x	

**Future role of the carbon border adjustment mechanism (CBAM)?**

*“In October 2023, the European Commission will introduce the carbon border adjustment mechanism, which, for the goods and sectors under its scope, will replace the existing mechanisms to prevent the risk of carbon leakage under the EU ETS. Instead, the CBAM will ensure equivalent carbon pricing for imports and domestic products. Under the (provisional) CBAM agreement, the Commission is mandated to assess the possibility of including all sectors identified as at risk of carbon leakage in the ETS Directive (Directive 2003/87/EC) at the latest by 2030.”*

	1 (totally disagree)	2	3	4	5 (totally agree)	I don't know
Any extension of CBAM to all ETS products, which will replace free allocation, should be done progressively and prioritize certain sectors.					x	
Priority should be given to sectors where absolute emissions are the highest.			X			
Priority should be given to sectors where the emission reduction efforts are the lowest.			x			

If the scope of CBAM were extended to additional sectors, which sectors would be the priority? (100 characters maximum)

The main criteria should be the risk of carbon leakage.



**Future role of the Effort Sharing Regulation (ESR) and links with the ETS**

With the ‘Fit for 55’ package, some emissions currently falling under the ESR (and the associated national targets) will also be covered under an EU ETS (notably CO emissions from road transport and buildings).

How should the scope of emissions under the ESR and the associated national targets evolve in the EU’s post-2030 climate policies?

	1 (totally disagree)	2	3	4	5 (totally agree)	I don't know
The ESR and associated national targets should cover only GHG emissions that are not subject to the EU ETS.		x				
The ESR and associated national targets should keep the same GHG scope as currently, covering both emissions that are not under the EU ETS (e.g. agriculture methane and nitrous oxide emissions) and emissions from fuels used in road transport and buildings (subject to the new ETS).					x	
There should be national targets covering all GHG emissions from all sectors (including those covered by the EU ETS).			x			
National targets should be replaced by EU-wide sectoral legislation.	x					





## CALL FOR EVIDENCE: FEEDBACK FORM

### EASE Feedback:

EASE – The European Association for Energy Storage believes it is paramount to support the highest-ambition climate targets for 2040 (“more than –90% emissions reduction”). This should be done for two reasons.

Firstly, by adopting very high targets, the EU will strengthen its fight against climate change and smoothen the transition to a sustainable, decarbonised energy system. Such targets attract investments that facilitate the deployment of renewables and energy storage solutions necessary for a decarbonised Europe.

Secondly, the adoption of a high-ambition intermediary 2040 target will effectively provide greater incentives for Member States to achieve the 2030 and 2050 climate targets. A low-ambition intermediary 2040 target may potentially be used as a reason to delay needed investments to meet the 2030 targets.

Importantly, these intermediary targets must be rooted in scientific evidence and take into account the potential economic, social, and technological implications. Conducting thorough research and impact assessments is necessary to ensure citizens’ and Industry’s trust in European Union policymakers.



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#### About EASE

The European Association for Storage of Energy (EASE) is the voice of the energy storage community, actively promoting the use of energy storage in Europe and worldwide. It supports the deployment of energy storage as an indispensable instrument within the framework of the European energy and climate policy to deliver services to, and improve the flexibility of, the European energy system. EASE seeks to build a European platform for sharing and disseminating energy storage-related information and supports the transition towards a sustainable, flexible and stable energy system in Europe.

For more information please visit [www.ease-storage.eu](http://www.ease-storage.eu)

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#### 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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