

Response to Climate Law Public Consultation, February 2020

Climate Law

In order to meet the challenges of global warming and to ensure the EU has a leading role in achieving a climate-neutral economy, a comprehensive long-term strategy is needed in the EU as a whole and in all MS. This can only succeed if clear goals, limits and criteria are set at an EU level and a MS level. The Climate Law must provide clear targets, milestones and trajectories for the EU and for the MS. A law with loopholes and undefined legal terms would only be a postponement of the long overdue debate. The legislative framework needs to convey clarity that no support for new coal, gas or nuclear is allowed, except for phasing out.

Net-Zero for 2050: The criteria for climate neutrality must be clearly defined as “no emissions”. The law should require avoiding emissions rather than later removing them from the atmosphere for storage and/or usage. Removal and sequestration measures will probably be necessary to mitigate historic emissions and for industrial processes, where no GHG-free technologies exists or are not yet mature. Sequestration faces challenges in terms of technology, costs, planning, and in public acceptance. Carbon removal cannot be used as an arbitrary compensation option for future investments, but only as a limited solution for technologies (not yet) available. Capture and sequestration is not a pretext for continued use and further lock-in of emitting technologies, particularly where renewable energies are available, cleaner and affordable.

EREF calls for a **GHG reduction of at least 55% for 2030**. A higher target of 65 % as called for by NGOs would be preferable to give strong incentives to the European industry. Targets, milestones, trajectories, related policies, regulatory and financial frameworks must be developed and agreed within the present term of the European Commission and Parliament. Fast and steep uptake of renewables and energy efficiency needs to be triggered before 2025.

To develop a comprehensive and meaningful strategic pathway for decarbonising our economy, a strategic agenda for accelerating renewables deployment across all sectors, the **GHG reduction target needs to be combined with higher targets** for renewable energies and energy efficiency. Building on the existing Governance Regulation, MS should be obliged to present and regularly update their NECPs including milestones, sectoral targets and policy frameworks. Once accepted by the Commission the NECPs should become mandatory and subject to infringement procedures and penalties.

EREF

European Renewable Energies Federation

EREF believes that **MS should maintain the right of flexibility** designing their respective renewable energy mix and support scheme mechanism. This is the most efficient way of reaching the 100% RES target.

The support and **promotion of conventional energy such as fossil and nuclear energy must be strongly discouraged**. We agree with the EIB's assessment that continued investment in conventional energy infrastructure will lock in GHG emissions for decades. Future-oriented action means investing in innovation, e.g. renewables and efficiency as well as system integration. The need for this legislative anchoring is obvious in the light of announcements of an energy transition using gas power as a "bridge technology". Considering the rapid technology development and cost decrease of renewable energy, locking in gas as a "bridge technology" would result in billions of stranded investment and require another expensive phase-out strategy like the ones for nuclear and coal. Therefore, **Investments should be redirected and focus on the rapid uptake of renewable energies and energy efficiency, aiming at a 100% renewable system well before 2050**.

The Just Transition Fund should secure sufficient means for job-generating measures to achieve a long-term effect in the affected regions. The EU needs to avoid competition within the regional transformation needs. The Fund should not be restricted to coal but also start helping regions which phase out nuclear energy.