EREF
European Renewable Energies Federation

Response to 2030 Climate Target Plan Consultation
15 April 2020

EREF welcomes the increase of the climate target for 2030. The planned reduction of CO_2 emissions by 2030 from 40% to 50-55% is another indication that the EU recognizes the international commitment from the Paris Agreement and the effects of the climate crisis.

However, **setting the target between 50-55% lacks ambition** and does not reflect the scientific knowledge available. A binding reduction target of at least 55% for 2030 is necessary. Also, the Commission should consider that there are already calls for a 65% reduction in 2030. In order to achieve the goals of the Paris Agreement, a binding reduction target of at least 75-80% is necessary for 2040. The targets should be defined early and clearly so that the EU can enter the COP26 negotiations with tangible domestic commitments. Postponing these decisions with a subsequent higher objective for 2040/2050 would be dangerous and counterproductive for scientific, technical, socioeconomic and practical reasons.

The Special Report of the IPCC on Global Warming has shown that missing the 1.5°C temperature target entails severe additional damages to the ecosystem and increases the chances of hitting tipping points that could spiral global heating out of control. It is vitally important that all possible measures are taken **now** to avoid the tipping points. At a later stage only limited damage control is possible.

Some of the measures will have to be quite drastic in the short term. In order to better cushion these effects and facilitate a just transition, measures should be initiated immediately so that they can be better distributed over time – while we still have options for climate mitigation and are not restricted to climate change adaptation. Numerous measures need considerable lead time for planning and construction (e.g. for infrastructure). It is therefore necessary to lay the framework and act now.

Studies show that early and ambitious action is more effective and less costly. Any measure stimulating investment takes time to be defined and implemented. Additionally, authorities, companies or private persons need time to adapt and derive appropriate steps and projects to fulfil the criteria. Decisive and quick action is the only way for EU businesses to benefit from first mover advantages and gain in competitiveness globally. Those actions can and should be linked to a EU recovery plan from the COVID-19 crisis, facilitating a green transition.

In order to avoid gambling on carbon capture technologies which might be available in the future, the reduction of GHG emissions must be a priority. The **plan should focus on avoiding emissions instead of removing them from the atmosphere**. Natural GHG sinks and/or existing or hoped for technologies for separation, storage or processing should only be considered for unavoidable emissions. They can only be a supplement to the accelerated expansion of renewable energies.

Climate Action needs energy transition. The transition will be most effective, if it is decentralized and based on renewable energies and energy efficiency. This approach reduces costs as well as dependencies and should preferably be pursued. For the Climate Target Plan (CTP), shorter intervals of 5 years should be considered for setting GHG reduction targets.

EREF welcomes the approach to analyse the NECPs for the assessment. The CTP needs to go hand in hand with a clear framework for binding targets for each Member State. A strong framework and trajectory for accelerated use of renewable energy in all sectors, for phasing out and ending the import of fossil fuels as well as investment incentives for a GHG-neutral industry are crucial. However, the process so far has highlighted many weaknesses, e.g. NECPs not covering all necessary issues, lacking ambition or not being submitted on time. Once established and accepted, the full implementation of the NECPs should become mandatory and subject to infringement procedures and penalties.