



The EU's 2030 climate target: NGO views on the European Commission's proposals

We are in a race against time. Forests are burning, ice sheets are collapsing and the window for stopping runaway climate change is closing. If we are to avoid the collapse of human civilisation as we know it and the mass extinction of life on Earth then immediate action is needed. The **50.5-52.8% real emission reductions the Commission is proposing is grossly inadequate and completely irresponsible.**

- Given the rapidly accelerating climate emergency, very rapid cuts in emissions are necessary. The UN emissions gap report 2019 implies **a cut of at least 65% in EU emissions** is needed to keep open the prospect of staying below 1.5°C and so avoiding catastrophic impacts, and that's without even taking into account equity-related issues such as the EU's wealth and responsibility for historical emissions. The Commission's proposal falls well short of this, and risks the passing of dangerous tipping points in the climate system, of creating stranded assets, and the need for unrealistically rapid and costly emissions cuts after 2030.
- The Commission's proposal to change the current 2030 target into a **'net' emissions target, including carbon sinks**, is a serious mistake and – depending on the size of the net LULUCF sink – could mean real cuts in emissions of only 50.5-52.8%. Increasing nature-based carbon dioxide removal by introducing legally binding targets for the restoration of EU forests, wetlands, peatlands and other ecosystems is critically important, but as recent wildfires have shown, removals are not stable or permanent and cannot be considered interchangeable with emissions reductions – or used as an excuse to delay action in other sectors. The EU should introduce a separate 2030 target for removals by natural sinks that is additional to domestic emissions reductions of at least 65%.
- Repealing the **Effort Sharing Regulation (ESR)** is completely unacceptable. It is Europe's most significant climate regulation and is a key driver of both national measures and member state support for EU measures, and as such repealing it could jeopardise even the achievement of a 55% cut in emissions. Nationally binding emission reduction targets – including emissions from the agriculture sector – must be retained, and brought into line with the new 2030 emissions reduction target. Governance of the targets should also be enhanced and the existing 'flexibility' mechanisms allowing the use of ETS allowances and land use credits should be scrapped.
- The **international aviation and shipping** sectors need to pay for their carbon pollution and must be included in the EU's revised 2030 target.
- The EU's **Emissions Trading System (ETS)** needs to be significantly tightened through a lower emission cap, deeper annual linear reductions and an end to the handing out of free pollution permits. Under no circumstances meanwhile should the ETS be extended to buildings and road transport, as the Commission suggests. These sectors

exhibit weak demand elasticity and such a move would likely deliver very little in the way of emission reductions while shifting the burden of the climate transition onto low income households – something that is not in the spirit of the European Green Deal and risks provoking a huge and unnecessary backlash. Road transport and buildings emissions are best addressed through other policy mechanisms and, like agriculture, must remain part of the ESR.

- If a **carbon border adjustment** mechanism proves necessary to stimulate global climate action, avoid carbon leakage and support investment in decarbonising energy intensive industries, it must go hand in hand with a full phase out of all current measures aimed at mitigating carbon leakage, including free ETS allowances.
- The Commission rightly identifies the potential for **ETS revenues** to support a just transition to climate neutrality. EU rules should require 100% of revenues to be spent on climate mitigation, for example the deployment of green technologies, circular business models, support for low-income households in the transition process, and supporting international climate finance. Spending must be additional to what would have happened anyway, exclude investment in fossil fuels or related infrastructure and do no harm to EU climate, biodiversity and environment objectives.
- The Commission projects that CO₂ emissions from passenger cars will be 50% lower in 2030 than the current passenger cars CO₂ target for 2021, and plans to propose tougher 2030 vehicle emissions standards for cars and vans by June 2021. The Commission has also rightly identified the need to consider a **ban on the sale of petrol and diesel cars** in the EU by a certain date. A recent study¹ shows that sales in the EU of new vehicles running on fossil fuels – including hybrids – must end by 2028 at the latest if we are to meet the 1.5°C objective and the size of the EU car fleet reduced.
- The EU's **targets for energy efficiency and renewable energy** have been important drivers of climate action and jobs in the low carbon economy. The Commission's impact assessment includes a range for energy efficiency of 39% to 41% (primary energy) and 36% to 37% (final energy), and a range for renewable energy of between 38 and 40%. Such figures represent an increase compared to the current EU 2030 energy targets, which are set to at least 32,5% for energy efficiency and at least 32% for renewable energy. To achieve a 65% emissions reduction and be in line with the Paris Agreement goals, NGOs are calling for an increase in the energy efficiency and renewable energy targets to at least 45% and at least 50% respectively.²
- The EU and member states should stop all public funding for fossil fuel infrastructure and nuclear energy. The EU continues to invest billions of euro in **gas infrastructure** and the Commission's impact assessment shows no sign of this changing, despite the risk of stranded assets. No EU public funds should be invested in new fossil gas infrastructure or hydrogen infrastructure based on fossil gas. The gas industry should

¹ Greenpeace 1.5C transport roadmap <https://www.greenpeace.org/eu-unit/issues/climate-energy/45014/new-roadmap-to-decarbonise-european-transport-by-2040-2/>

² CAN Europe/EEB: Building a Paris Agreement Compatible (PAC) energy scenario. <http://www.caneurope.org/docman/climate-energy-targets/3620-pac-scenario-technical-summary-jun20-embargo/file>

also be in a much less central role when it comes to infrastructure modelling and planning. While renewable hydrogen will be important in hard-to-abate sectors such as shipping, aviation and high temperature industrial processes, it will play no significant role in the decarbonisation of the buildings, power or road transport sectors. On this basis instead of supporting significant volumes of hydrogen regardless of its origin or climate benefit the EU should be investing in district heating, large scale heat pumps, heat storage technologies and non-infrastructure solutions.

- The EU's policies relating to **bioenergy** continue to pose a serious threat to the global climate and to forests. There is now compelling and authoritative scientific evidence that without radical change, the criteria in the revised Renewable Energy Directive (RED) will continue to incentivise types of bioenergy that increase emissions dramatically compared to fossil fuels. And that the EU's LULUCF rules will not stop that from happening. It is therefore essential that - at a minimum - the RED be amended to end incentives for dedicated biofuel or energy crops and the burning of tree trunks and stumps.
- There are also serious problems of sustainability associated with **new hydropower**, which would be negligible in terms of its contribution to the decarbonisation of the energy system but very significant in terms of its negative impacts on European rivers. On this basis the EU should exclude new hydropower of any scale from eligibility for incentives. More generally, all renewable energy must be developed in biodiversity-compatible ways through appropriate strategic planning and siting and strict adherence to EU law.
- Climate change is already hitting European farmers hard and poses an existential threat to much of EU agriculture. But at present the **Common Agricultural Policy**, which will absorb almost a third of the EU budget in 2021-2027, supports activities that actively accelerate climate change and environmental degradation. A radical reorientation of support is needed away from intensive livestock production and the ongoing draining of peatlands and in favour of farming practices that are environmentally sustainable, including the conservation and restoration of organic soils, wetlands and peatlands, no-till agriculture, agroforestry and organic farming. Recent life-cycle calculations show that GHG emissions from the livestock sector continue to increase and are now equal to 17% of EU emissions from all sectors. Member States should be required to plan and implement measures that will ensure a reduction in GHG emissions from agriculture, including by reducing EU production and consumption of animal products, promoting paludiculture systems, and the approval of CAP strategic plans by the European Commission should be withheld until this condition is met.