Consultation on the preparation of a legislative proposal on the effort of Member States to reduce their greenhouse gas emissions to meet the European Union's greenhouse gas emission reduction commitment in a 2030 perspective

(This consultation addresses the Effort Sharing Decision. A separate public consultation "Addressing greenhouse gas emissions from agriculture and land use, land use change and forestry in the context of the 2030 EU climate and energy framework" is organised at the same time.

Fields marked with * are mandatory.

Introduction

The European Commission today launches a public consultation on the preparation of a legislative proposal on the effort of Member States to reduce their greenhouse gas emissions to meet the European Union's emission reduction commitment in a 2030 perspective. It concerns the continuation in the period 2021-2030 of the current Decision 406/2009/EC on the effort of Member States to reduce their greenhouse gas emissions to meet the Community's greenhouse gas emission reduction commitments up to 2020 (Effort Sharing Decision, ESD) (http://ec.europa.eu/clima/policies/effort/index_en.htm)

The Effort Sharing Decision sets greenhouse gas emission reduction targets for each Member State for the sectors not covered by the EU Emissions Trading System. Its scope currently covers some 55 % of total greenhouse gas emissions in the EU and includes greenhouse gas emissions from sources such as CO2 emissions from road transport, heating of buildings, small-scale industry and so-called non-CO2 emissions from agriculture and waste. The ESD does not include emissions or removals from land use, land-use change and forestry (LULUCF). Each Member State has an emission reduction or limitation commitment for 2020 under this Decision which varies between -20% and +20% as compared to its 2005 GHG emissions. Taken together, these commitments correspond to an EU-wide reduction in 2020 of around 10% compared to 2005 for the sectors covered by the ESD.

The objective of the ESD is to achieve its contribution to the EU's overall 20% reduction target in 2020 and to promote reductions of greenhouse gas emissions (GHG) within its scope in a cost-effective manner.

In addition to the 2020 targets, the ESD establishes binding annual GHG emission limits — so-called annual emission allocations (AEAs) — for all Member States for the period 2013–2020 with annual reporting obligations and compliance checks.

At the European Council meeting in October 2014, EU leaders expressed their wish to continue the ESD approach for the period 2021-2030, with the aim to reduce emissions in the non-ETS sectors by 2030 by 30% compared to 2005 as the contribution in implementing the overall economy-wide emission reduction target of at least 40% in 2030 as compared to 1990. (http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/145397.pdf)

The consultation launched today aims to collect evidence, experiences, suggestions and opinions related to the post-2020 design of the ESD itself and focuses on several issues, including:

1.) the flexibility mechanisms foreseen is the ESD to ensure overall cost efficiency,

2.) monitoring, reporting and compliance,

3.) the approach to setting the national greenhouse gas reduction targets in the ESD, and

4.) complementary EU-wide action to achieve the reduction targets.
It also asks for stakeholder feedback on the ongoing implementation of policies and measures in Member States to achieve their targets set out in the current Effort Sharing Decision that sets national targets until 2020.

This consultation addresses citizens, authorities and other stakeholders and seeks input on questions concerning the policy alternatives to be considered by the European Commission in its preparation of a legislative proposal to revise and maintain the ESD after 2020. It complements earlier consultations that the European Commission has conducted recently, notably the Consultation on the Green Paper on a 2030 framework for climate and energy policies (
http://ec.europa.eu/energy/en/consultations/consultation-progress-towards-2020-http://ec.europa.eu/
)

Based on a questionnaire, the online consultation will run until 18 June 2015. Earlier replies are encouraged.

This consultation is launched in parallel with the consultation "Addressing greenhouse gas emissions from agriculture and land use, land use change and forestry in the context of the 2030 EU climate and energy framework" (http://ec.europa.eu/clima/consultations/articles/0026_en.htm), which addresses questions on how to integrate Land Use, Land Use Change and Forestry into the 2030 Climate and Energy Framework, on how this integration will relate to agricultural non-CO2 emissions and on the relation between such changes and the Effort Sharing Decision.

Background:

On 24 October 2014, EU leaders expressed their wish to work towards a domestic EU greenhouse gas emissions reduction target of at least 40% by 2030 compared to 1990 together with other building blocks for a 2030 policy framework for climate and energy (http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/145356.pdf), following the policy proposals in a European Commission Communication of January 2014 (http://ec.europa.eu/clima/policies/2030/documentation_en.htm). The 2030 framework aims to make the EU's economy and energy system more competitive, secure and sustainable and also sets a target of at least 27% for renewable energy and energy savings by 2030, respectively.

The Commission has indicated in its February 2015 Roadmap for the Energy Union annexed to its Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy that it intends to present a legislative proposal on the Effort-Sharing Decision for the period 2021-2030 and on the inclusion of LULUCF into the 2030 Climate and Energy Framework in 2016. (http://ec.europa.eu/priorities/energy-union/docs/energyunion-annex_en.pdf)

0. Registration

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- ○ Other

*0.2 Please enter the name and contact details of your organisation (address, e-mail, website, phone)

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0.3. Register ID number (if you/your organisation is registered in the Transparency register)

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1. Flexibility mechanisms

In order to provide for flexibility for Member States in implementing their commitments and as a means to enhance the overall cost-effectiveness of reaching the EU-wide 2020 target, the Effort Sharing Decision (ESD) provides a number of so-called flexibility mechanisms that can be used in the period 2013-2020 to comply with their annual targets. Should the greenhouse gas emissions exceed the annual emission allocations (AEAs) for the relevant year Member States are allowed to borrow 5% of their AEAs from the next year, buy AEAs from other Member States or use international project credit rights in order to fill any deficit for compliance. Should a Member State reduce its emissions by more than needed, thus exceeding its target for a given year, it can bank the surplus AEAs for use until 2020 or transfer it to other Member States. It is also possible for a Member State to transfer to other Member States up to 5% of its AEAs for a given year before compliance have been checked for that year. Member States are obliged to report on concluded agreements of AEA transfers among each other, but are otherwise free to decide on whether and how to engage in such transfers. As of early 2015, there were no known concluded agreements of AEA transfers between any Member States.

For the 2030 perspective the European Council has expressed its desire that *"the availability and use of existing flexibility instruments within the non-ETS sectors will be significantly enhanced in order to ensure cost-effectiveness of the collective EU effort and convergence of emissions per capita by 2030."* Flexibility instruments should be simple, transparent and easy to manage for Member States. The intention that international project credits will not be allowed in the ESD after 2020 means that a stronger emphasis on the two existing internal flexibility mechanisms will be needed:

1) Banking and borrowing of AEAs during the compliance period

As explained above, Member States already have flexibility in managing the use of their AEAs over the whole commitment period to cover any AEA shortage in specific years. Different levels of borrowing than the current 5% limit could be envisaged for the period after 2020 to help Member States achieve their annual targets by managing their own AEAs, bearing in mind that a higher level of borrowing early in the commitment period could increase the risk of individual Member States not meeting their targets later in the period.

2) Transfers of AEAs between Member States

There are several possible ways to stimulate AEA transfers among Member States. These include creating a more transparent market for AEA transfers, being less restrictive in how much Member States can transfer among each other before the compliance checks, and more direct measures to enhance availability of AEAs, such as project-based mechanisms or auctioning of a number of AEAs.

Market transparency could be enhanced by requiring Member States to report more openly and frequently on AEA transactions and prices or by encouraging transfers to pass through certain trading platforms.

The current 5% limit for AEA transfers before the compliance check could be increased, however, it should be noted that increasing this limit could also increase the risk of individual Member States not meeting their targets later in the commitment period 2021-2030.

Different kinds of project-based mechanisms for cost-efficient compliance within the ESD could be considered. Such an approach could attract targeted investments in ESD sectors prioritised by the host Member State and ensure more certainty that AEAs will become available for transfers by potentially allowing private sector initiatives. However, a verification and certification system would need to be established to guarantee the environmental integrity and validity of the credits which would entail upfront administrative costs.

Auctioning of a certain percentage of AEAs could ensure that an annual supply of AEAs becomes available for MS to acquire.

For all above aspects, alternative solutions might also be possible.

Question

1. How can the availability and use of the two existing internal flexibility instruments under the ESD be enhanced to ensure cost-effectiveness of the collective EU-effort in 2021-2030:

a) for banking and borrowing; and
b) for AEA transfers among Member States, respectively?

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Ireland's compliance trajectory for the period 2013-20 is likely to be somewhat unusual, being characterised by initial annual surpluses of AEAs followed by increasingly large shortfalls. The initial surpluses arose largely because of a sharp slowdown in economic activity between 2008 and 2011. If that painful event had not occurred, then Ireland would now be seeking to purchase AEAs on a large scale. Given the evident lack of market liquidity, our recent compliance efforts would probably have been problematic. We believe that one of the reasons for this lack of liquidity is that there may actually be too much flexibility for banking by some member states.

It has always the Commission's intention that the ESD would have a redistributive effect. The European Commission Staff Working Document, "Analysis of options beyond 20% GHG emission reductions: Member State results" (SWD 2012/5 final), confirms that member states that underachieve their targets are assumed to acquire excess emission allocations from member states that overachieve their target. Therefore, poorer member states ought to be able to generate a net revenue stream by achieving a surplus of AEAs. However, experience to date suggests that the relevant member state governments are holding on to any surplus. Unlimited use of the banking mechanism effectively frustrates the formation of an economically efficient market.

Ibec therefore believes that if AEA borrowing by member states remains limited to 5%, then AEA banking should henceforth also be limited to 5%. Or if borrowing were instead allowed up to 10% then banking should likewise be limited to 10%. Buyers and sellers would then have more symmetrical incentives to trade, resulting in greater economic efficiency.

With respect to the latter, is there need for more transparency in how Member States engage in AEA transfers? Could the current rules be further enhanced through more transparent reporting, the use of trading platforms, project-based mechanisms, auctioning, or through other means? Are there examples from other areas that could provide useful experience in designing a post-2020 transfer system?

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There is certainly a need for more price transparency. However, it won’t easily be achieved through better reporting or even thorough a bilateral trading platform. Perhaps a better way to achieve the desired result – provided that symmetrical restrictions on borrowing and banking are in place – would be a Mandatory Gross Pool market for AEAs. Buyers and sellers would periodically bid all of their respective annual shortfalls and surpluses into this Pool. The intended outcome would be for every seller to receive the same price and every buyer to pay the same spot price. Such an arrangement would not only be completely price-transparent, it would also promote far greater liquidity and would mitigate the potential for market power.

2. Monitoring, reporting and compliance

The Effort Sharing Decision (ESD) and the Monitoring Mechanism Regulation (Regulation (EU) No 525/2013, MMR) have established an annual reporting and compliance cycle requiring an annual review of Member States’ greenhouse gas inventories to ensure that compliance with the ESD is assessed in a credible, consistent, transparent and timely manner. The reviewed inventory data are used to check Member States' compliance with their annual emission limits. If a Member State's emissions exceed its annual emission allocation even when the flexibilities are taken into account, it will need to take corrective action in addition to the likelihood of the Commission launching regular infringement procedures. The corrective action includes a penalty of 1.08 times the Member State's excess annual emissions adjusted for the following year and temporary suspension of its right to transfer AEAs to other Member States.

The first annual inventory review will be carried out in 2015 and will concern Member States' inventories for the year 2013.

It needs to be considered whether more flexible rules for banking and borrowing and enhanced AEA transfers under the ESD will be possible with less frequent compliance checks.

Question

2. On the basis of experience with the present set of rules on reporting, monitoring, and corrective actions, which aspects should be maintained and which should be changed after 2020?

Please select one of the following:

- [ ] ***a) Keep it as it is: Annual reporting and annual compliance checks with existing corrective action (explain your reasons);***
- [ ] ***b) Annual reporting with biennial compliance checks with existing corrective action (explain your reasons);***
- [ ] ***c) Biennial reporting with biennial compliance checks and enhanced corrective action (explain your reasons and possible additional corrective actions); or***
- [x] ***d) Other (with explanation).***

Please explain your selection:

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As previously noted, the 2020 member state targets for the non-ETS sector were allocated by the Commission in such a way as to encourage cross-border trade in AEAs. However, it isn’t working as intended. The current compliance regime financially punishes member states that end up with a shortfall against an annual target even if they are delivering in full on their national action plans. In such cases, the underlying problem is not a lack of effort, but rather an inability to procure AEAs from other member states. There is no corresponding financial incentive to discourage member states from banking an excessive quantity of surplus AEAs.

Ibec considers that the annual reporting should be maintained beyond 2020, as it would be vital for the proper administration of the Mandatory Pool that we outlined above. Arguably, there would not be any need for enhanced corrective action. Indeed, it might even be feasible to remove the current 8% penalty attaching to member state shortfalls. In the event of an emerging EU-wide shortfall of AEAs, the clearing price in the proposed Pool would automatically rise, however it should be subject to a price ceiling.

Buyers and sellers alike would have financial incentives to undertake additional domestic abatement to put the EU’s collective trajectory back on track. By incentivising all the market participants equally, it would also be better able to underpin the Commission’s international commitments.

Allowing some member states to convert a portion of their EU Allowances into AEAs may help to speed up the elimination of the growing EU-wide surplus of Allowances. However, it would potentially interfere with the Market Stability Reserve. Care would need to be taken to ensure a predictable impact on market prices for AEAs as well as EUAs. Given that the MSR would presumably have ‘less work to do’ over the coming years in order to achieve its ultimate objective (a stable EUA price), it would be important for the Commission to ensure that the aggregate incentives for abatement across the ETS and non-ETS sectors are not diluted.

The post-2020 regime in any case ought to include explicit clarification that at least some of the wealthier member states will be expected and encouraged to achieve part of their compliance through acquiring AEAs. Some bodies have publicly opposed any use of international credits by national governments, regardless of the economic consequences for the country. Taking the view that the planned use of purchased AEAs to help comply with a post-2020 target as a ‘failure’ to achieve the non-ETS abatement target purely through domestic action. However we need to remind ourselves that the requirement for GHG reduction is of global importance and not a domestic issue and therefore a variety of flexible mechanisms should be pursued that would result in the best environmental outcome in the most cost efficient way.

3. Setting national targets for GHG emissions not covered by the EU Emissions Trading System

The Effort Sharing Decision sets Member State targets for GHG emissions between -20% and +20% by 2020 compared to 2005 based on economic capacity, with reduction targets for countries with higher GDP per capita than the EU average, and emission increase limits for countries with lower GDP per capita. This provides a distributive element among Member States. Various flexibility mechanisms, including AEA transfers between Member States (see question 1) enable cost-effective target achievement in principle.

The Commission impact assessment for the 2030 framework for climate and energy policies (Commission Staff Working Document SWD 2014/15, section 5.9, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52014SC0015) reconfirmed evidence that cost-effective mitigation potentials to reach the GHG emission reductions in ESD sectors in line with a 40% overall GHG reduction target continue to differ across Member States. The assessment noted that realising these potentials implied higher effort compared to GDP by lower income Member States. It also noted that a similarly large spread in targets for 2030 as established in legislation for 2020 would lead to very high ambition levels for some higher-income Member States whose domestic potential for making such reductions is relatively limited.

The October 2014 European Council on this issue expressed its wish that that "*the methodology to set the national reduction targets for the non-ETS sectors, with all the elements as applied in the Effort Sharing Decision for 2020, will be continued until 2030, with efforts distributed on the basis of relative GDP per capita."* The European Council also expressed its wish that the applicable target range be as follows: *"All Member States will contribute to the overall EU reduction in 2030 with the targets spanning from 0% to -40% compared to 2005."* This means that the methodology to set targets for Member States with a GDP per capita below the EU average in principle would not require modification. However, the European Council expressed a desire for a new element concerning higher income Member States, requesting that the *"targets for the Member States with a GDP per capita above the EU average will be relatively adjusted to reflect cost-effectiveness in a fair and balanced manner."* This would address concerns of higher income Member States by foreseeing the creation of a new flexibility for a limited number of Member States *"through a limited, one-off, reduction of the ETS allowances"* that can then be used for compliance in the ESD.

Question

3. How can cost-effectiveness be reflected in a fair and balanced manner in adjusting individual ESD targets for Member States with a GDP per capita above the EU average? What can be the role of the one-time reduction through a limited amount of ETS allowances in achieving these Member States' ESD targets, while preserving predictability and environmental integrity?

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The 2030 climate and energy framework in 2.11 explicitly permits the use of cost effectiveness, and stated "targets for the Member States with a GDP per capita above the EU average will be relatively adjusted to reflect cost-effectiveness in a fair and balanced manner". This

demonstrates an important deviation from the 2020 Effort Sharing Decision methodology measured solely by GDP per capita.

Analysis and modelling of mitigation costs in the non-ETS using the Irish TIMES Energy Systems Model (see section 4 for reference) undertaken by University College Cork underlines the disproportionate cost to the Irish economy in meeting the 2020 target of -20%. This analysis by Brian Ó'Gallachóir (et al.) calculated "an abatement cost four times higher than the marginal abatement cost of €40-€50/tC02 sufficient for Ireland to achieve a 17% non-ETS GHG emissions reduction in the analysis carried out to inform the Effort Sharing Decision". With this in mind, along with our particular emissions profile which highlights the sheer scale of the 2030 challenge, Ireland's target for 2030 should reflect the reality our situation and not incorrectly assume that the starting point is an unachievable target.

The Impact Assessment for the 2030 climate and energy framework estimated a cost of €40/tC02 to meet the overall targets. However, analysis by Deane et al. paints a very different picture, resulting in just -7% compared to 2005 at €40/tC02. Reduction of -20% would result in paying in excess of €135/tC02, more than three times the anticipated cost in Europe with an extra €649 per domestic heating bill. A more ambitious reduction of -25% for the same period would result in €194/tC02; nearly five times higher than the anticipated cost.

A GDP per capita methodology would bear heavily on our economic recovery and tax payers for many years to come; a balanced approach for target allocation between cost-effectiveness and GDP per capita would alleviate the burden. This is all the more pivotal when projected national debt figures (and Ireland's ability to invest) are considered. The IMF projects Irish national debt of 89.6% of GDP by 2020. This will be 5.4 percentage points above the Eurozone average and 10.8 percentage points above the EU average.

The social cohesion argument for existing non-ETS targets based primarily on relative per capita GDP is that richer member states could afford to subsidise economically efficient GHG abatement in less wealthy member states. Assuming this objective is retained, the onus should be on the Commission to ensure that none of the wealthier member states face an unreasonable burden. Experience to date has not been encouraging in this regard. As previously noted, if Ireland had not experienced such a severe recession it would now be facing huge compliance costs for the non-ETS sector.

Ibec considers the average GDP per capita to be an arbitrary restriction for adjustment of member state commitments according to the principle of cost-effectiveness. Why not instead include member states whose GDP is more than 75%, rather than 100% of the EU average? Other things being equal (i.e. assuming no change to the scope of the non-ETS sector*) this would enhance the scope for coping with individual national circumstances. It would thereby reduce the risk of countries like

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Ireland being unfairly penalised simply for the industrial profile of
their national economy.

* We discuss the issue of possible changes to the non-ETS regime in a
separate submission.
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4. Further evidence and studies on implementation of the Effort Sharing Decision at Member-State level and at regional level

In accordance with Article 14 of the Effort Sharing Decision (ESD), and to establish a solid knowledge-base for the 2030 proposal and its impact assessment, the European Commission is conducting an ex-post evaluation of the current ESD. Member States report their greenhouse gas emissions and on progress towards their 2020 commitments annually; the results of these reports are published each year by the European Environment Agency and the Commission. (Report from the Commission to the European Parliament and the Council: Progress towards achieving the Kyoto and EU 2020 objectives and Annex; Trends and projections in Europe 2014: Tracking progress towards Europe's climate and energy targets for 2020)
In the context of the European Semester, the European Commission also publishes annual reports on Member States' progress with respect to their 2020 targets. (http://ec.europa.eu/europe2020/pdf/themes/16_energy_and_ghg_targets.pdf and http://ec.europa.eu/europe2020/making-it-happen/country-specific-recommendations/index_en.htm)

To support the evaluation process, the Commission would welcome any additional studies and evidence from stakeholders.

Question

4. Do you have studies on:

- *the implementation of the ESD at the level of Member States and at regional level;*
- *how the ESD incentivises greenhouse gas reductions in the different sectors concerned;*
- *good practices of policies and measures that are of particular interest for sharing with other Member States; and*
- *other benefits apart from greenhouse gas emission reductions*

that you think the Commission should be aware of?

In your view, what are the key lessons learned of these studies relevant for the European Commission and other Member States, and what other benefits does ESD implementation bring (e.g. in terms of job creation, energy security, health benefits, …)?

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Ibec is aware of abatement cost projections derived from the Irish TIMES modelling work at University College Cork. These appear to suggest that domestic compliance costs in the energy sector would substantially higher than the estimates provided to the Commission in by the PRIMES model. We understand that the Irish Government has already communicated these concerns to the Commission. From a business perspectives, and keeping Ireland's national debt levels in mind as well our particular emissions profile, a liquid market for transfer of AEAs, as well as a target fairly balanced between cost effectiveness and GDP per capita, is essential for Ireland to maintain a reasonable level of burden.

The Environmental Protection Agency estimates that non-ETS sector emissions are projected to be 9% - 14% below 2005 levels by 2020. Even when Ireland is making good progress in meeting other EU mandated targets, these projections highlight how "…a starting point for post-2020 obligations in excess of the range of expected outcomes for 2020 (i.e. 9%-14% below 2005 levels) will inevitably lead to severe compliance challenges early in the following decade and beyond."

References:

- Chiodi, A. et al., 2013. Modelling the impacts of challenging 2020 non-ETS GHG emissions reduction targets on Ireland's energy system. Energy Policy, Issue 62, pp. 1438-1452.
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- Deane P, Curtis J., Chiodi A., Gargiulo M., Rogan F., Dineen D., Glynn J, FitzGerald J. and Ó Gallachóir B 2013 Low Carbon Energy Roadmap for Ireland. Report published by Department of Environment, Community and Local Government http://www.environ.ie/en/Publications/Environment/ClimateChange/FileDownLoad,41727,en.pdf).
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5. Complementary EU-wide action in the sectors covered by the Effort Sharing Decision

Member States are responsible for implementing policies and measures to meet their obligations under the Effort Sharing Decision (ESD) according to their national situation. These may include a variety of national actions ranging from economic instruments, such as tax regimes to support specific low-carbon fuels, information campaigns to promote public transport, integrated urban and transport planning, supporting improved energy performance in buildings and switching to renewable energy for district heating.

To a certain extent these national measures are also supported by other EU-wide climate and energy policies, including on CO2 emission standards for light-duty vehicles (cars and vans), non-CO2 gases, energy efficiency (e.g. Energy Performance of Buildings Directive , Energy Efficiency Directive) and on renewable energy sources (Renewables Directive).

Question

5. Is the current scope of EU-wide action and legislation OTHER than the ESD to support Member States' emission reductions in ESD sectors sufficient, or should it be enhanced?

- ( ) ***a) The current scope is sufficient; or***
- (•) ***b) The current scope should be enhanced.***

Please explain your selection:

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Ibec believes that carbon sequestration from improved land use should be allowed to count towards the EU's collective 30% non-ETS target for 2030 and the use of net afforestation LULUCF credits to assist in mitigating Ireland's non-ETS emissions. The EPA's non- ETS 2030 projections for the combined contribution of the agriculture and transport sectors is 80%. Therefore given their low mitigation potential, the use of net afforestation credits should be introduced to the carbon mitigation framework. However, we propose to discuss the appropriate treatment of LULUCF in a separate submission.

Other actions and ways to unlock carbon savings, such as vehicle efficiency standards and building performance standards are within the competence of the European Commission. In order to maximise the mitigation potential they should be monitored under the framework of Energy Union governance.

6. Capacity building and other support to implementation at national, regional and local level

The EU and the European Commission are supporting the implementation of the current Effort Sharing Decision through, inter alia:

- Projects financed through the European Structural and Investment Funds, as well as other initiatives to build capacity and exchange best practices;
- Regional workshops on implementation, to facilitate exchange of best practice and experience with national policies and measures among Member States; and
- Annual guidance to Member States in the European Semester.

The European Commission's Climate Change Committee and its Working Groups is an important forum for exchange with Member States' administrators and experts on implementing measures at national level.

Question

6. Is there a need for additional EU action in terms of capacity building and similar support targeted at the regional and local level to facilitate national policies and measures under the ESD after 2020?

- (●) ***a) Yes***
- ( ) ***b) No***

If you selected answer a), what kind of additional support do you have in mind?

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Improvement in and sharing of carbon mitigation modelling should be
promoted and supported by the Commission as an important tool in
achieving the most least-cost low carbon pathway in each member state
and across the EU as a whole.
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Contact

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