



# **Summary of Member State responses to the 2030 green paper for a climate and energy framework**

October 2013



*The EU has a clear framework to steer its energy and climate policies until 2020 through three headline targets for GHG emissions reductions, renewable energy and energy saving. However, the 2030 agenda lacks the political agreement necessary to fuel investment in energy infrastructure and incentivise low carbon technologies. In an attempt to devise a coherent position on the 2030 climate and energy framework, the European Commission conducted a public consultation on a 2030 framework for climate and energy policies in the first half of 2013. A Communication from the European Commission is expected by the end of 2013.*

*The Commission received 550 formal submissions, which included replies from some 14 Member States, including: Austria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Poland, Portugal, Romania, Slovenia, Spain and the United Kingdom. Other respondents can be categorised as companies and trade associations, NGOs and civil society interests groups, trade unions and citizens.<sup>1</sup>*

## **Key points**

Member States are in broad agreement that a 2030 framework would deliver certainty among investors, citizens and governments. There is a common level of agreement about the need for a greenhouse gas (GHG) reduction target, albeit with varying levels of ambition. For example, some of the Member States expressed conditional support dependent upon impact analyses or a more ambitious target in the context of global climate agreement.

Member States are divided on renewable energy goals and there is disagreement as to what form these should take.

Companies and business organisations argued that Europe should put cost-competitiveness, security of supply and climate objectives on a more equal footing. These submissions underlined the impact of international developments on European competitiveness. Industry requests that climate and energy policies consider the consequences of the economic crisis.

## **Member State responses to the consultation – main positions on targets**

A Commission Services Non-Paper on the main outcomes of the public consultation provides analysis of the positions of the Member States, with a special focus on GHG reduction, renewables and energy efficiency targets.

### **GHG reduction**

Poland is opposed to any CO<sub>2</sub> reduction target before the conclusion of an international climate agreement, while the Czech Republic and Romania would only accept such a target “in the case of a global agreement”. Some Member States make support conditional upon impact analyses, whilst Denmark, France, Spain and the United Kingdom favour a binding target of 40%.

### **Renewables**

While Denmark and Austria favour a renewable energy target, France would only back one at a later stage following a partial harmonisation of renewable support schemes. Romania believes renewables targets should be set at the discretion of Member States, while the United Kingdom and Czech Republic explicitly oppose any renewable energy goals.

### **Energy efficiency**

The United Kingdom and Czech Republic oppose mandatory energy savings targets, while Denmark and Portugal support them. France, Austria and Cyprus want the discussion postponed to 2014, following evaluation of the Energy Efficiency Directive. Finland points to an indicative EU energy efficiency target while Romania favours an aspirational target.

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<sup>1</sup> Ibec, Business Europe and several sectoral trade associations made submissions. A number of Irish based utilities made individual responses. The responses to the consultation can be viewed at [http://ec.europa.eu/energy/consultations/20130702\\_green\\_paper\\_2030\\_en.htm](http://ec.europa.eu/energy/consultations/20130702_green_paper_2030_en.htm)

**Table of Member State responses to the European Commission's green paper for a 2030 framework for climate and energy**

**+ = Yes      (+) = Conditional support      -= No**

<b>Country</b>	<b>Binding GHG reduction targets</b>	<b>Binding renewables targets</b>	<b>Binding energy efficiency targets</b>	<b>Other important information</b>
<b>Austria</b>	<p><b>+</b></p> <p>No value determined</p>	<p><b>(+)</b></p> <p><b>Conditional</b></p> <p>System security and social dimension to be taken into account</p>	<p><b>-</b></p> <p>Await the evaluation of the EED in 2014</p>	<ul style="list-style-type: none"> <li>- International climate agreement necessary to avoid distortion of competitiveness.</li> <li>- Strongly in favour of RES supports provided that system security and the social dimension is taken into account.</li> <li>- Discussion on energy efficiency targets should be postponed until evaluation of the EED is complete.</li> </ul>
<b>Cyprus</b>	<p><b>-</b></p> <p>No binding targets and configuration of targets should be relative to the financial capabilities of the individual Member States</p>	<p><b>-</b></p> <p>No binding targets</p>	<p><b>-</b></p> <p>Await the evaluation of the EED in 2014</p>	<ul style="list-style-type: none"> <li>- Stronger emphasis on the national circumstances of Member States and the most complementary technologies.</li> <li>- A distinction between energy-producing and energy-importing Member States should be made; the latter should receive financial (and other) support to increase competitiveness.</li> </ul>
<b>Denmark – preliminary position</b>	<p><b>+</b></p> <p>Unilateral CO2 targets of 40% by 2030 (60% by 2040)</p>	<p><b>+</b></p> <p>30% by 2030</p>	<p><b>+</b></p> <p>Binding target after the 2014 review of the EED</p>	<ul style="list-style-type: none"> <li>- Structural reform of the ETS is required to restore credibility to EU climate policy instruments.</li> <li>- The Commission should analyse the advantages/disadvantages of introducing a short-term price mechanism to alleviate the current lack of investment and explore the extension of the scope of the EU-ETS to other sectors.</li> <li>- Fair burden sharing in deciding national renewables targets – Denmark will insist upon fair burden sharing among Member States.</li> <li>- Denmark will finalise its 2030 position following the</li> </ul>

				publication of the potential economic effects.
<b>Estonia</b>	<p>+</p> <p>No value given</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>Subsidies and other aid must be EU-wide and harmonised</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>EU wide action must have substantial benefits and be cost-effective</p>	<ul style="list-style-type: none"> <li>- Estonia has unique indigenous energy sources and believes in the implementation of a flexible energy and climate policy framework.</li> <li>- Member States must have greater flexibility and freedom of choice in choosing the policy mechanisms necessary to achieve targets.</li> <li>- Supports a single EU-level GHG reduction target for 2030 – should target sectors with the greatest potential.</li> <li>- In favour of EU ETS “backloading” proposal, but requests action by the Commission on EU ETS reform.</li> <li>- EU should arrive at a single negotiating position for COP21.</li> <li>- Renewable energy expansion should be market-based, without government subsidies as they distort competition within the EU.</li> </ul>
<b>Finland</b>	<p>(+)</p> <p>No value given</p> <p><b>Conditional</b></p> <p>A dual emission reduction target for 2030 should be considered in the context of global negotiations</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>Indicative or a moderate binding target</p>	<p>-</p> <p><b>Conditional</b></p> <p>Indicative, and member states should be able to define their own national targets</p>	<ul style="list-style-type: none"> <li>- A singular emission reduction target is likely to deliver cost-efficiency and provides flexibility to adapt to changing technologies. Three separate targets set at the EU level hinder the optimization of measures.</li> <li>- Energy efficiency is already widely promoted. Common measures, such as energy-efficiency standards for equipment, will be employed to an increasing extent across the EU.</li> <li>- Renewable energy development subsidies have affected the price of emission allowances. Subsidies should be limited to the development and deployment of new emerging technologies.</li> <li>- Binding targets for sub-sectors (agriculture, transport etc.) reduces flexibility and decrease the possibility for Member States to meet the overall emission reduction target in a cost-efficient manner.</li> <li>- Capacity mechanisms should be well coordinated and designed in a way that minimises market distortion.</li> </ul>
<b>France</b>	<p>+</p>	<p>(+)</p>	<p>(+)</p>	<ul style="list-style-type: none"> <li>- Equal consideration of climate protection, affordability (for residential and commercial consumers) and security of</li> </ul>

	<p>Unilateral GHG reduction target of 40% by 2030 (60% by 2040)</p> <p>Measures for the prevention of carbon leakage (especially without international climate agreement)</p>	Should only be determined following the introduction of a partial harmonisation of support schemes		<p>supply.</p> <ul style="list-style-type: none"> <li>- Better coordination of measures and instruments to achieve goals; especially the readjustment in the EU ETS if renewables expansion and increasing energy efficiency obligations cause the price of allowances to drop. The feasibility of a controlled pricing mechanism for allowances should be explored.</li> <li>- Burden-sharing for non-ETS sectors required after 2020.</li> <li>- Ambitious R&amp;D and innovation policy.</li> </ul>
Italy <sup>2</sup>	<p>+</p> <p>No value determined.</p>	-	-	
Lithuania	<p>(+)</p> <p>No value determined (dependent upon international climate agreement)</p> <p><b>Conditional</b></p> <p>Impact analysis must demonstrate that policies are not expected to negatively impact</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>Renewable energy targets should be market-based and harmonised at the European level (at least regionally)</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>Relative targets</p>	<ul style="list-style-type: none"> <li>- Energy policy must prioritise competitiveness and security of supply.</li> <li>- Additional indicators for security of supply, market integration, infrastructure development and R&amp;D promotion should be translated into national targets.</li> <li>- RES expansion through EU ETS alone should be analysed.</li> <li>- Structural reform of EU ETS required - low CO2 prices have failed to provide adequate investment signals.</li> <li>- In the absence of an international climate agreement, measures required to prevent carbon leakage.</li> <li>- Nuclear power is a low-CO2 technology. Government support should be permitted in the construction of new plants.</li> <li>- If binding targets are proven to damage competitiveness, supportive measures should be introduced - specific country obligations might be set based on GDP.</li> </ul>

<sup>2</sup> No official response submitted to the consultation.

	the competitiveness of Member States and individual sectors.			
<b>Netherlands</b> <sup>3</sup>	+	-	-	<ul style="list-style-type: none"> <li>- Focus on increasing cost efficiency in renewables development.</li> <li>- Possibility of targeted, technology specific support for RES (without EU targets).</li> </ul>
<b>Poland</b>	<p>(+)</p> <p><b>Conditional</b></p> <p>International climate agreement. Need to agree on tools and methodology.</p>	-	-	<ul style="list-style-type: none"> <li>- 2030 framework should be decided after COP21. It should be technology neutral and flexible like 2020 framework to better address the specific needs of individual Member States.</li> <li>- EU ETS should be the main instrument to reduce GHG emissions in the EU. Withdrawal of subsidies in the energy production sector (also for RES).</li> <li>- Does not support the EU ETS “backloading” proposal.</li> <li>- Target definition should only follow impact analyses.</li> <li>- Energy, climate and industrial policy goals should be more consistent than before (especially the former target of 20% share of industry in GDP).</li> <li>- Periodic oversupply of energy for those using priority purchases of RES has caused current fluctuations in wholesale energy prices and reduced predictability of investment in new production capacities – this can put security of supply at risk.</li> </ul>
<b>Portugal</b>	<p>(+)</p> <p><b>Conditional</b></p> <p>Completion of the Internal Energy Market</p>	<p>(+)</p> <p><b>Conditional</b></p> <p>Interconnector expansion, functional cooperation mechanisms</p>	+	<p>Mandatory savings target</p> <ul style="list-style-type: none"> <li>- The global competitiveness of Europe should not be overlooked in favour of ambitious energy and climate goals that may not result in a global effort.</li> <li>- EU should only legislate/set targets after careful impact assessment, per Member State, per sector.</li> <li>- Intermediate target as regards physical interconnection between Member States – to meet the target of 10% electricity interconnection between (as percentage of production capacity) –by 2015.</li> <li>- RES: implement cooperation mechanisms, already</li> </ul>

<sup>3</sup> No official response submitted to the consultation.

				<p>foreseen in the RES Directive, that enable renewable energy produced in Portugal, for example, to count towards the target of Luxembourg (statistical exchanges).</p> <ul style="list-style-type: none"> <li>- The breakdown of the sectors into sub-sectors may imply the loss of flexibility to Member States to better adapt the policies to their reality and peculiarities.</li> </ul>
<b>Romania</b>	<p><b>(+)</b></p> <p><b>Conditional</b> International climate agreement.</p>	<p>-</p> <p>(RES targets should only apply at national/MS level)</p>	<p>-</p> <p>Aspirational target</p>	<ul style="list-style-type: none"> <li>- 2030 targets must be complementary, especially GHG-targets and energy efficiency targets.</li> <li>- A flexible, technology neutral target for the share of renewable energy could be set by each Member State.</li> <li>- Calls for flexibility in state aid rules.</li> <li>- Binding renewables targets have discouraged investment in unsubsidized low carbon technologies - renewable energy should be properly integrated in the IEM; RES targets requiring increased renewable energy production should be avoided.</li> <li>- Increase powers at Member State level to determine the energy mix. This can be achieved by incentivizing investments in storage facilities and grid infrastructure development.</li> </ul>
<b>Slovenia</b>	<p><b>(+)</b></p> <p>GHG reduction target of 40% by 2030</p> <p>In the absence of an international climate agreement, a climate import tax should be introduced</p>	<p>Open</p>	<p>-</p>	<ul style="list-style-type: none"> <li>- Flexible 2030 framework, based on the principles of cost-efficiency and a robust security of supply.</li> <li>- Impact assessments of possible 2030 scenarios for individual Member States required.</li> <li>- International climate negotiations must take measures to prevent carbon leakage.</li> </ul>
<b>Spain</b>	<p><b>+</b></p> <p>Unilateral GHG-</p>	<p>-</p>	<p>-</p>	<ul style="list-style-type: none"> <li>- A decision on 2030 targets is an important prerequisite for an international climate agreement.</li> <li>- Binding interconnection target of 10%.</li> <li>- Member States flexibility in the design of instruments is important in meeting targets.</li> </ul>



	reduction target of 40% by 2030 (60% by 2040)			<ul style="list-style-type: none"> <li>- Framework should be built on the existing instruments, especially the retention EU ETS.</li> <li>- The current practice of subsidising energy intensive companies (which depend upon the financial strength of the individual Member State) is not suitable.</li> <li>- R&amp;D policy must be strengthened to increase cost efficiency and facilitate the transformation of the energy sector.</li> </ul>
<b>United Kingdom</b>	<p>+</p> <p>Unilateral GHG reduction target of 40% by 2030</p> <p>In the context of an international climate agreement, GHG reduction of 50% by 2030</p>	-	-	<ul style="list-style-type: none"> <li>- The UK believes the EU should adopt an ambitious emissions reduction target for 2030, delivered in a flexible, technology neutral way, supported by a robust, reformed emissions trading system, and underpinned by a global agreement in 2015.</li> <li>- Climate mitigation policies have a direct impact on industrial electricity prices which can create a risk of carbon leakage.</li> <li>- Urgently deliver structural reform of the EU ETS, on the basis of legislative proposals from the European Commission, put forward well before the end of this year.</li> <li>- The introduction of mandatory renewable energy or energy efficiency targets risk the cost effective pathway to 2030 GHG outcomes.</li> </ul>

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