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Private citizen, participation at the public consultation on the
Green Paper for climate and energy policies in 2030

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- [Green Paper "A 2030 framework for climate and energy policies" \[COM\(2013\) 169\]](#)

Answer to the questions:

4.1 general, on lessons learned:

Targets are positive and motivate the countries and players. The change of targets a few years after their publication as in the case of transport fuels undermines the confidence in the EU policy and should be avoided. Therefore targets should be discussed thoroughly with all stakeholders before a decision is taken. After a decision the EU commission should remain committed to the targets.

4.2 Targets

Global warming is the biggest threat to our society and economy. Global warming above 2°C would destroy our standard of living, parts of our ecosystems and would have catastrophic consequences.

Therefore future targets should be derived from natural science based facts on required emissions reduction in line with the 2°C target. There should be a target on emission reduction, one target on a minimum share for RES and a target for the maximum use of fossil fuels in terms of Mtoe in line with the emissions reduction target.

The targets should be defined for 2030 and 2035 to give the actors a longer planning horizon.

The target should be formulated for Europe and for each member state. To make decisions possible it should be considered to define recommended targets in line with 2°C target, that are voluntary and legally binding targets that could be 20% lower than the recommended targets.

Targets should be for each country without targets for subsectors. This gives more flexibility to adjust to changing technologies. There should be one exemption: a subtarget for renewables in the transport sector should remain as part of the policy to improve the security of supply.

Based on these principles the following proposals for new targets are made:

Recommended targets for EU 28:

	unit	2030	2035
minimum reduction on GHG emissions as compared to 1990	%	40	50
minimum share of RES	%	45	50
maximum use of fossil fuels	Mtoe	800	600
minimum share of RES in the transport sector	%	12	14
maximum share of imported biomass to the EU 28 from outside Europe (Europe defined as a continent)	%	20	20

4.3 instruments

The emission trading system is not successful. It should be step by step replaced by a general tax on fossil carbon with exemption for the industry operating in the world markets.

Such a tax would set a clear framework to go for cost efficient solutions. It would also make energy more expensive, the best incentive for more energy saving. In addition, in a system with a high capacity of wind and solar electricity energy saving on sunny or windy days is not a main issue, because the society would use the abundance of solar energy.

Additional financial support will be needed to change the heating systems fast enough including the building of new district heating/cooling grids.

Feed in tariffs for biomass should take into account the need for biomass electricity as kind of stored electricity to respond fast and flexible to the intermittency of wind and solar electricity. In addition support for biomass electricity should only be given to plants with an efficiency above 60%.

The introduction of 2G fuels should be supported by a support for the produced unit over a time of 12 years rather than by high investment grants.

Research should be also directed to the set up of a new electricity system based on renewables.

4.4 Competitiveness and security of supply

The EU should avoid to put money in such inefficient technologies as CCS or to push too fast in very expensive solutions such as 2ndG fuels.

A final decision about the quantity of 2nd G fuels should not be taken before a few commercial plants have been operating for several years and enough experience is available.

The problem of carbon leakage would be solved if the ETS could be replaced by a carbon tax.

The operating cost to produce electricity with wind, solar or hyadro are very low. The main cost are the capital cost at the beginning. Instruments to reduce the capital costs would also reduce the price of this electricity.

In the case of biomass strong efforts are needed to increase the production of biomass in Europe: full use of the available land for production, incentive to take not used land into production, more research to increase the yield in agriculture and foresty. As soon as other countries such as North America also turn to a switch of their energy system the import of biomass form abroad will get uncertain.

A straightforward policiy in line with the 2°C target in Europe is the best strategy for succes in the international climae negotiations.

4.5 Capacity and distributional aspects

Individual member state targets based on their national resources are one important part in effort sharing. The Commission could also propose minimum key figures such as installed wind or PV or solar themal capacity per capita in 2030 and 2035 as guideline for the member states but also for regions and in some cases for municipalities. Similar key figures for district heating/cooling are thinkable. Additional financing instruments are desirable for some of the proposed activities.

The EU should realize the needed GHG emissions in compliance with the 2°C target in Europe independent on the global negotiations. This alone would make it possible to regain a leading position in the climate negaotiations.