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Hespul's reply to the European Commission Green paper on 2030 Climate and Energy Framework

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Executive summary

To achieve the multiple objectives of the European Climate and Energy policy, the European Union should adopt an integrated climate and energy framework with ambitious and legally binding targets for Renewable Energy Sources (RES), Energy Efficiency (EE) and reduction of Greenhouse Gas emission (GHG). Those new binding minimum targets should be established at European level and broken down at national level for an efficient and legally enforceable implementation. Such a framework would bring more benefits for European citizens and industries than a one-legged policy based on a supposedly "technology-neutral" "GHG-only" approach.

The consensus of the 2009 agreement should be preserved and the three targets should be adopted at the same time. For a mutual reinforcement the RES goal and energy efficiency targets should be determined first, then addressing the remaining emissions with a GHG target.

The European Commission should not follow the temptation to first reach an agreement on a GHG emissions targets in view of the international discussions in 2015 at the COP in Paris, and then pursue negotiations on RES and EE targets. This would send the wrong signal to investors and international partners as it would not reflect the EU commitment to comprehensive and an integrated framework for 2030. Due to the long-term investment cycles, investment certainty for RES is needed now as 2020 is already tomorrow.

⇒ **Therefore, the European Commission should propose an integrated climate and energy framework based on RES, EE and GHG ambitious and legally binding targets.**

Key points of the reply

HESPUL calls on the European Commission to prepare a legislative proposal to:

- Propose three mutually reinforcing 2030 targets for RES, Energy Efficiency and GHG emissions. The targets should be ambitious, legally binding, set up at national level and broken down into nationally binding targets.
- Guarantee the continuation of the priority access for RES.
- Give the possibility for the Commission to impose direct penalties on the Member States which do not fully and timely implement the post-2030 framework.
- Resolve some of the malfunctioning of the EU ETS on short term (through the EU ETS allowances back-loading) and medium-term (through a structural reform of the system).
- Ensure a level playing field by making a thorough analysis of subsidies given to the energy sector and push the EU Member States to phase out subsidies to fossil fuels and nuclear energy.
- Not allow any new subsidies to nuclear energy.
- Encourage EU Member States to adopt flexible and evolving support frameworks for RES to avoid retrospective changes.
- Develop in parallel to the 2030 framework an industrial policy, a better financing framework for RES and a comprehensive and ambitious R&D policy