AEGPL's submission to the public consultation on a 2030 Framework for climate and energy policies

As citizens and as representatives of a clean and relatively low carbon gaseous fuel, the European LPG industry strongly supports the emergence of an ambitious EU climate strategy, and is committed to optimizing LPG's role in the transition towards a more climate-friendly energy model.

AEGPL agrees with the trio of targets, reflecting the three areas that must be addressed for the EU to effectively tackle climate change and future energy challenges. It is important that the three objectives be coherently addressed, so as to avoid multiple regulations on the same target and the ensuing regulatory burden for companies.

Of the three targets, improving **energy efficiency** is the most effective means of simultaneously addressing the key challenges of sustainability, security of supply and competitiveness. Efficiency, as opposed to the promotion of any one type of energy, should be the cornerstone of Europe's energy strategy.

As far as the **target for GHG** is concerned, it appears that the **impact of black carbon on climate change** was underestimated at the time when the Decision laying down the minimum contribution of Member States to meeting the GHG emission reduction commitment was published in 2009. The definition of greenhouse gases given in Article 2 of that Decision did not include black carbon. Since then, numerous studies, including a landmark scientific study published in 2013 by the American Geophysical Union, have found that black carbon is the second biggest contributor to climate change after carbon dioxide ([1]). Furthermore it has been noted by scientists that unlike with carbon dioxide, reductions in the emissions of black carbon have an immediate impact on climate and as a result action on this pollutant has the added benefit of reducing the chance of reaching climate "tipping points" in the short and medium term. It should be stressed that the European Parliament, in a Resolution adopted in September 2011, urged the Commission to undertake "immediate action towards the reduction of black carbon emissions as a fast-action method of halting glacial melting". Black carbon should therefore be added to the list of pollutants covered by the target.

Concerning the **renewables target**, and the question of whether it would be fit to maintain the separate renewables target for transport: Increasing such a target seems hardly

[1] 'Bounding the role of black carbon in the climate system: A scientific assessment', American Geophysical Union (2013) available on Wiley online library

appropriate given the current doubts as to whether the present 10% target will be reached. In addition, the uncertainty concerning the accounting of the actual emissions from biofuels (how to take into account the ILUC factor) do not provide for the setting of a detailed strategy for renewables in the transport sector. Finally, such a target may be seen as redundant given the recent initiative from the Commission on the development of alternative transport fuels (Com(2013)18). Considering the overall EU objective of effectively decarbonising the transport sector, AEGPL would like to suggest making any EU target on transport more in line with the Directive proposed recently for supporting the uptake of cleaner alternative fuels. We believe that instead of having a target looking exclusively at biofuels, this target could be complemented or even replaced by a more ambitious target for alternative fuels covered in (Com(2013)18). It is indeed widely accepted that biofuels are not the only mean the EU has to decarbonise its transport and other alternative fuels are equally important.

The climate and energy framework must be elaborated so as to be coherent with policies dealing with related specific sectors, e.g. the upcoming review of air quality policy. To optimize the **cost-efficiency** of meeting climate and energy objectives, synergies between policy areas should be better implemented. For example, synergies between climate policies and air quality policies can be exploited by fighting first and foremost pollutants that have effects both in terms of human health and climate change. Additionally, measures at consumer level (information on energy saving technologies, awareness raising, and education) can have a great impact at a relatively low cost.

Furthermore, investments in socio-economic **research** could help develop our understanding of consumer behaviour as regards low carbon technologies, prices and energy savings. Consumer behaviour plays an important role in the success of energy policies on the ground. Such research could help companies and policy-makers design more targeted energy technologies and systems.

Finally, AEGPL would like to point out that ambitious EU-level action on climate change will be infinitely more effective if it occurs as part of a wider **global movement**, particularly on the part of other major economies. Ultimately, establishing a working consensus with key partners on this point, ideally under an umbrella of European leadership, must be the top priority over the coming months and years. The EU's policies and action on climate change, however extensive and ambitious, will have no effect on the final outcome if it ends up being the winner in a one horse race.