Green Paper on a 2030 framework for climate and energy policies
Consultation response

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Introduction

The British Agriculture Bureau represents the interests of farmers in the UK's four devolved regions: England, Scotland, Wales and Northern Ireland. We welcome this opportunity to respond to the European Commission's consultation on climate and energy policies post 2020 and believe that our members have an important role to play in that future.

See below our responses to the consultation questions:

4.1. General

The overall 2020 framework with its three headline targets sent a clear message about EU climate and energy policy and set an international example. It will be important to capture the same simplicity and clarity of ambition in designing policies for 2030, most likely by maintaining headline targets for the same three subjects; GHG emissions, renewable energy and energy efficiency.

In particular, the adoption of the 2009 Renewable Energy Directive (RED), and its legally binding renewable energy targets, has resulted in significant growth in renewables deployment in most Member States. Despite progress towards attaining interim targets, the steepening trajectory for most Member States means that additional effort may be required to stay on track, just at a time when EU-wide economic pressures and possible competition from unconventional fossil fuels threaten to slacken the pace of renewables uptake. Strong signals that post-2020 renewables targets will be ambitious and challenging are needed now, to ensure success not only in the next decade, but also in the present one.

4.2. Targets

The most comprehensible and effective targets for 2030 would be similar to the 2020 framework, applying at both EU and MS level – again, they should be legally binding. Non-binding sectorial ambitions would be better directed to engage the potential of particular sectors to harness clean energy and promote green production. We welcome the European Parliament's call for a mandatory 2030 renewable energy target of at least 30%. We disagree with the UK government's position that supports a 2030 GHG emissions target alone, although we endorse Energy Secretary Ed Davey's recommendation of a unilateral EU-wide binding emissions reductions target of 40% target in the absence of a global climate deal, and 50% by 2030 in the context of an ambitious global deal.

The proposed amendment to the 10% target for renewable energy in the transport sector is already causing a hiatus in fuel processing investment. Imposing retrospective quotas rather than voluntary ambitions for advanced non-food biofuel feedstocks may have the perverse effect of reducing EU influence in the global biofuels market. A 2030 target needs to send consistent investment signals about the desired balance of renewable resources without curtailing development of the processing infrastructure, leading to stranded investments.

A renewables target for transport is desirable, not only for the direct benefits to this sector but in creating consistent investment flows in energy source production and processing (e.g. additional bioenergy feedstocks from agriculture, additional clean electricity demand).

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A non-binding agriculture sector ambition could help to realise the potential of multiple land-based renewable energy technologies to both mitigate climate change and diversify EU energy supply. We would have major concerns about any attempt to introduce legally binding targets for agriculture. Regions of the UK are net exporters (for example Northern Ireland exports 80% of its food produce) and would automatically be at a disadvantage if emissions targets were set for agriculture. The agri-food sector is one of the few growing markets and there are national targets to increase agri-food output in an 'environmentally sustainable model' over the next decade. Our focus is firmly on creating greater efficiency on farms and lowering the carbon intensity of our produce. To introduce a sectorial target (with the added risk of a levy if targets are not met) would have the potential reduce to farm competitiveness and have a significant knock on effect on agri-output. There is a possibility this would export sectors of our industry to other countries where climate change legislation is perhaps less of a concern.

4.3. Instruments

Strong research and development support, particularly in the energy sector, is needed to ensure the readiness and later scale-up of key technologies such as torrefied biomass (bio-coal), BECCS (biomass energy with carbon capture and storage), energy storage and long-distance electricity transmission. This should also have a significant focus on assessing the capabilities of agriculture and land based management to sequestrate carbon which seems to be largely unknown/ unacknowledged.

4.4. Competitiveness and security of supply

We note that whereas farmers and landowners can receive a share of income from the exploitation of indigenous renewable energy resources at the land surface (solar, wind, bioenergy, etc.), this may not be the case with the development of sub-surface fossil fuel resources (e.g. shale gas) over which the landowner has limited or no rights.

4.5. Capacity and distributional aspects

Resistance to setting EU-wide and national renewable energy targets for 2030 may be overcome by an increased focus on cooperative effort-sharing mechanisms in the Renewable Energy Directive that enable renewable energy produced in one Member State to count towards the target of another.

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