

Central Europe Energy Partners Rue Froissart 123-133, Etterbeek (B-1040 Brussels). Transparency Register number: 87738563745-94

Central Europe Energy Partners (CEEP) is an organisation of companies and scientific institutions, mainly from Central Europe, involved in the energy sector within the European economy. It was established three years ago, (June 2010), and has got, right now, 19 members from 6 countries representing 330,000 employees, and an overall turnover in excess of Euros 34 billion. CEEP is very active at the EU level, (see the activities of CEEP on the website: www.ceep.be).

CEEP's position on climate issues, set out below, represents the opinions of its members from the energy sector.

"Consultation on the 2015 International Climate Change Agreement: Shaping International Climate Policy Beyond 2020"

## 1. General Remarks:

## 1.1. Actual situation

The question of climate change is very important for us and for our future generations, and should be addresed, not only by the EU, but by all countries all over the world, especially from OECD countries and such big economies as China, Russia, Brazil, India (G-20), etc. When we write 'addressed', we have in mind, not only verbal declaration, but actual activity leading to CO2 emission decreases. Some countries are trying to take unilateral measures, but the results are meagre. The result is that even modest pledges of the countries have been implemented to about 30%. This shows that 'practical enthusiasm' measures for climate defence are absolutely not enough. Take, for example, such rich countries as the US, where emissions per capita in 2011 amount to 17.3 tonnes; Canada 16.2; Australia 19; Japan 9.8; Russia 12.8; and South Korea 12.6; whereas the average in Europe is 7.5 tonnes. The majority of countries are even below the EU level, as for example, India, which has got 1.6 tonnes only; Brazil 2.3; and Turkey 2 tonnes. The average figure for the world is 4.9 tonnes. It's not easy to solve a dilemma on how to make the biggest emitters decrease their emissions, whilst curbing the ambitions of many countries to develop their industries, which ultimately means an increase of emissions. This does concern India, Turkey, or even Brazil, but we should bear in mind that, in the near future, many Asian countries will try to develop their economies, and 'sleeping' Africa will soon emerge with their ambitions, too.

1.2. Does richer mean more emissions?

This is not a rule, but in the overwhelming majority of cases, the countries with higher GDP

per capita are the biggest emitters of CO2. Should these countries decrease their

emissions sharply, not only for the climate's sake, but for the sake of the healthy

development of the developing countries, to keep world average CO2 emissions not higher

than, for example, 2011's figure for G-20 counties of 4.9 tonnes per capita? The discussed

100 billion dollars per year to support developing countries seems not to be a proper

solution, as from one side, it's an alluring amount, but from the other side, climate change

prevention measures are considered by many of these countries as a very serious hurdle

on the way to industrial development.

1.3. Impact of climate policy.

We must remember that climate policy may change economies and the living standards

of citizens, especially in countries with a low GDP, due to their high sensitivity to rises in

energy prices. Therefore, it is important to seriously consider a fair share of the costs of

climate policy, taking into account the GDP per capita, the CO2 emissions per capita.

and the unemployment rate.

1.4. More consideration

Much more should be done by the EU, to convince the biggest emitters to decrease sharply

their emissions per capita, but in terms of practical reality, otherwise the EU will have no

chance to compete with many countries such as the USA, Canada, China, and even

Turkey.

It seems to us that the benchmark of CO2 emissions by 2030 should be the same for the

EU, G-20, and OECD countries, and our suggestion is: 7.1 tonnes per capita. Such a figure

will be fair for all these countries, and will assure fair competition, and a fairer international

share of employment. In such a case, no carbon leakage, and no closing of existing

facilities in the EU should be expected.

2. Questions:

2.1: Question No.1: According to us, the goals which are proposed by the EU are too ambitious

for the leading economies in the world. Take, for example, the USA: their emissions per capita in

2011 were 17.3 tonnes, whereas in the EU, the average was 7.5 tonnes. Very ambitious USA's

plans decrease this figure by 2020, to about 13 tonnes, which will still be two times more than in

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the EU at that time. If the benchmark will be 7.1 tonnes in 2030, with great probability, the USA

will be able to achieve this level, as well as China and others. Of course, this means a slowdown

of ambitious EU plans, but will enable the EU economies - to survive. The Agreement can still give

the opportunity for those countries, who want to be leaders in CO2 emission decreases, that on

an individual basis, they can pledge higher decrease figures.

Another chapter should concern the developing countries and how to cope with their ambitions for

development of their industries. In our opinion, simple distribution of as high an amount as one

hundred billion US dollars yearly, will not be sufficient, and should rather be substituted by the

transfer of BAT and related equipment.

2.2: Question No.2: Our proposal concerning the establishment of a benchmark for the emissions

per capita should prevent any carbon leakage. This does not concern developing countries, for

whom different regulations should be established, as it is not possible to put into one basket - both

developed and developing countries.

2.3: Question No. 3: This question is of a political character and depends on whether the politicians

can convince their societies and colleagues from other countries, that global warming is

scientifically justified. Action is now required if we want us and future generations to be protected

from the negative consequences of climate change. This remark concerns EU activities as well,

as we see that a lot of unnecessary effort takes up time within the EU, while the major trust should

be directed towards their international activities, first of all, with the OECD, and then, the G-20

countries.

2.4: Question No. 4: As we said in answer to question no.2, the basic criteria should be CO2

emissions per capita. We can consider as well GDP per capita, but we presume that the richest

countries will not accept it. Another possibility is the unemployment rate, but this proposal again

will not be accepted by the richest countries.

2.5: Question No. 5: In our view, the Agreement should be divided, as mentioned above, at least

into two parts - one for developed countries (the EU, OECD, G-20), and the other for developing

countries, as it would be very difficult to find the common economic denominator for a patchwork

of countries.

2.6: Question No. 6: As climate change is a global issue, we should apply global mechanisms to

encourage CO2 emissions decreases. It is doubtful that such a mechanism could be based on the

EU model, but some of its components could be included. We are especially referring to the ETS,

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which has the chance to be internationalised on a voluntary basis, under United Nations

supervision and organisation. A separate Convention should be prepared based on the 2015

Agreement. Another instrument is the proposal of 100 billion US dollars which, as mentioned

already by us, should be transferred in the form of BAT, and relevant equipment. One should

answer the question how to accept particular investment in developing countries. Again, a special

Convention derived from the 2015 Agreement, should be prepared. The United Nations should

define the role of the World Bank in climate change issues.

2.7: Question No.7: The 2015 Agreement should be the basis of the Convention which will

describe the transparency and accountability of countries. The method should be clear and there

should be the possibility to verify the received data by the United Nations, similar to the

controls/regulations applied by the EU. How to penalise countries which fail to meet their

obligations? This is a very serious problem which can lead, for example, to imposing extra

customs' duties.

2.8: Question No. 8: As we mentioned above, a less ambitious approach will bring better rewards.

that is why we propose 7.1 tonnes per capita emissions, in 2030, for EU, OECD, and G-20

countries. This will enable an honest discussion with the richest countries, and not penalise the

less affluent nations, giving them the chance to decrease CO2, develop RES, whilst developing

their own indigenous sources of energy, and decreasing unemployment. If these factors are not

accepted in the 2015 International Climate Change Agreement, there will be no chance to find a

common solution for the developed countries, and even less likely to produce an agreement that

will satisfy the interests of the developing countries.

2.9: Question No. 9: As we already suggested, the EU should become more active, especially in

talks with the richest countries, plus China, as they do have, and should have, the biggest impact

on climate change.

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