Local & Regional Europe

Climate Change

Strategy for long-term EU greenhouse gas emissions reduction

CEMR response to the public consultation

8th September 2018

Council of European Municipalities and Regions
Registered in the Register of Interest Representatives
Registration number: 81142561702-61

Background of the consultation

The European Commission launched a public consultation on a strategy for long-term EU greenhouse gas emissions reduction in July. The consultation follows a high-level stakeholder consultation event held in Brussels on 10-11 July 2018. Contributions are expected by 9 October 2018.

In March 2018, EU leaders asked the European Commission to present, within 12 months, "a proposal for a strategy for long-term EU greenhouse gas emissions reduction in accordance with the Paris Agreement". This followed a similar request form the European Parliament.

The public consultation will feed into the Commission's deliberations for a strategy that will reflect on a long-term vision for a modern European economy for all Europeans and the opportunities and challenges that a long-term decarbonisation implies.

The consultation aims at: Collecting views and opinions on the technological and socio-economic pathways that should be explored for a long-term EU greenhouse gas emissions reduction strategy; Gathering factual information, data and knowledge, including drivers, opportunities and challenges relevant to the long-term strategy. The consultation covers the views of citizens and other stakeholders on the types of transformations required, level of ambition and key actions to achieve it – including interactions with other ongoing transformations, the societal and economic opportunities and challenges, the role of the consumer and the need for investment and innovation. It will also address technical questions on the potential of some mitigation options.

The Commission aims to put forward its strategy proposal ahead of the next UN climate conference (COP24) taking place in Katowice, Poland in December 2018, where CEMR will participate.

CEMR welcomes the opportunity to contribute to this process through its members associations and with these following key messages as CEMR, the European umbrella organisation of 60 national associations representing 130.000 local and regional governments, including those from all EU member states.

Messages from CEMR members (responses to the general questions in the online questionnaire):

1. Long term greenhouse gas emission reductions

a. What are the biggest opportunities and challenges?

i. Successful implementation of the Paris Agreement will rest on **recognising the contribution of and ensuring national/ EU support to local and regional governments**. Many of these are committed to go beyond current targets and empowering them to do so will be vital in limiting global warming to 1.5ºc. It is important that local authorities are involved and able to participate regardless of size, organisation and geography.

ii. **Legal frameworks** which do not allow for an independent action from the subnational level need to be changed. CEMR advocates for greater flexibility to achieve commonly set European objectives. Varying conditions, opportunities and existing measures across the EU and on local and regional level should be respected. CEMR also advocates mainstreaming and integration of climate policy in other sectors and policy areas, such as the CAP, industrial policy, eco-design, public procurement, energy taxation and state support etc.

iii. Access to appropriate **financial resources** is crucial to implement measures; for example investing in sustainable energy sources. Adaptation requires long-term strategic planning, investment, resilience proofing infrastructure and responding to disasters. Many of these activities are not possible to fit within regular municipal budgets. Meeting ambitious climate, energy efficiency UE objectives needs around 100 billion euros/year investment and the lack of investment is estimated between 38 and 54 billion euros/year.[1] The EU has a major role to play and real added value via its policies and financial mechanisms supporting climate mitigation and adaptation projects on the ground. This question must remain on the top priorities in the next MFF post 2020 and in the menu of the cohesion policy, Interreg programmes and other programmes such as Life, Horizon Europe. In that perspective the priorities given to climate issues in the MFF commission proposal for the 2021-2027 period are an important signal even if we need to make sure that local and regional projects will benefit from it in a larger way.

iv. **Increased support of technical expertise** for the identification of projects and support for regular work in adaptation, mitigation and sustainable energy.

v. **The offer of green options, measures and** policies in the climate sector is not fully exploited yet at the local level, and the opportunities there are very large.

vi. To strengthen the **cooperation** with the state and other stakeholders, in Europe and internationally, exchange of good practice, establish good conections with other international networks working on climate issues

[1] Study Notre Europe // Commission européenne, Mobilising investment for Europe's Energy Union, 26 August 2015

vii. Effiicient mechanisms for **data** collection and disclosure need to be developed. To understand in what kind of assumptions on the economic development is the strategy built on? Do the developments provide support or challenge for the reduction measures
viii. Appropriate **communication** with the citizen : more awareness of the public is needed (through communication tools, public awareness raising campaigns,…).

Some examples from CEMR members:

The city of Cluj-Napoca, Romania, aims by 2025 to make a full transition to a public transportation based on electric energy.

In Seville, Spain: As far as its climatology is concerned, Seville stands out for its high temperature, almost no rains during the summer, the relative mildness of the temperatures and a moderate level of rainfall during the winter period. Its location in the valley of the Guadalquivir River, and some of its characteristics typical of large cities make the so-called Urban Heat Island in Seville (the city captures and produces more heat than it is capable of dissipating, generating a microclimate that can exceed in many degrees the environment average, especially in summer.This thermal difference translates into energy, economic, health and well-being costs that can put the viability of the city in crisis in the climate and energy crisis scenario that we live in.

COSLA, the Scottish Association of local authorities, welcomes policy focus on cities and urban areas. However, it is important that Local Authorities are involved regardless of geographic or institutional size. There may be further opportunities to support non-city authorities that emit less emissions but are able to lead on Co2 removal and reducing emissions from agriculture/ land use.

Some recent commitments from the Finnish municipalities:

- The City of Turku aims to be carbon neutral by 2029. This requires extensive innovations in especially the energy and transport systems, as well as the operations of the City, companies, and the whole civil society. According to the Climate Plan, the Turku Region energy system will be made carbon neutral by 2029. The use of coal in energy production will be ended already in 2025, with the prerequisite that the government will take part in the investment costs. The City of Lappeenranta has the target for 2050 in which the city no longer generates landfill waste or release emissions into the air and have stopped overconsumption. Green Lappeenranta is a key strategic goal for the city of Lappeenranta, in terms of both residential comfort and industrial policy.
- The Greenreality Network is a business-oriented network of energy and environmental operators in South Karelia, Finland, generating growth and business opportunities for its members and the region. The network was established by local businesses in the energy and environmental industry, the city of Lappeenranta and Lappeenranta University of Technology (LUT).
- Carbon Neutral Joensuu 2025 will have procedures e.g. reducing the greenhouse gas emissions from land use and increasing carbon sinks; reducing traffic emissions and the use of private transportation while increasing the use of low- to zero-emission transportation; reducing the energy consumption by 2025 by at least 25% compared to 2007; basing at least 90% of the energy consumption on renewable energy sources in 2025.

- City of Helsinki has a plan called “Carbon Neutral Helsinki 2035”. Helsinki’s definition of carbon neutrality is to reduce greenhouse gas emissions generated within the city borders by 80% and to offset the rest.

2. **The impact of low carbon transition on your sector** :

    a. How can opportunities and challenges (in particular related to carbon intensive sectors or regions) be addressed? What key economic transformations should the EU pursue to achieve a low carbon and resilient economy?

        i. Mainstreaming climate change into governance and management structures is a key issue and not fully implemented.
        ii. The energy sector needs to be transformed to renewable energy. This foresees proper prizing of GHG and the activity from both large energy companies, as well as local energy communities, including local and regional government.
        iii. Diversification in carbon intensive industry and more promotion of renewables.
        iv. More research and spreading of good practice is needed to inform practice and local decision-making.
        v. Public procurement to reduce climate impact should be supported by structures such as availability of LCA-data, standardisation and digital systems for proof/product declarations and facilitating procurement procedures.as well as dialoges with industry to develop new products.
        vi. EU level roadmaps are welcome where technical solutions do not exist with long-term timescales/ objectives.

Some examples from CEMR members:

The Dutch provinces: societal and behaviour change is also necessary. Dedicated attention to the role of Local Governments in supporting behavioural change may help. More awareness of the public is needed through communication tools and public awareness raising campaigns. In these campaigns there should also be attention for the choice of food consumers make and the consequence of this choice for the climate. For example, the difference between the choice of red meat vs. vegetables. As an exemple, the Dutch provinces work on campaigns which focus on the daily life of the consumer, like sorting of household garbage and the recycling of this garbage which will strongly reduce the greenhouse gas emissions.

The Finish Association: on behavioural change: there is amount of scientific research on behavioral change. While the municipalities do not necessarily have the expertise in behavioral science, it provides the grounds for everyday life so collaboration with other actors is needed. On awareness raising: more impact driven awareness raising is becoming a priority.

3. **Energy**

    a. What are the biggest opportunities, including for the wider economy? What are the biggest challenges, including as regards public acceptance or the availability of land and natural resources, related to these future developments?

        i. Expanding investment in renewable energy.

ii. Exchanging experience about climate action with other cities, regions, states, companies, etc., in order to feed into our local strategies for climate change mitigation and adaptation.
iii. Getting new input on how to make aligned actions with other stakeholders in "the grand coalition" and how to scale up actions.
iv. Creating policy synergies, addressing identifying gaps in support and increasing connectivity in energy systems are all important in allowing the Local Government sector to contribute fully.
v. Offering options for local economic development and carbon budgeting.

Some examples from CEMR members :

The Finish Association : a case for Energy theme: energy efficiency agreements are a part of Finland's energy and climate strategy and a primary tool to improve the efficient use of energy in Finland. Voluntary agreements are a tool, chosen together by the Government and industrial/municipal associations, to fulfil the EU energy efficiency obligations set for Finland. By ensuring that the agreement scheme is comprehensive and successful, Finland can continue to meet the obligations without resorting to separate new legislation or other new coercive measures. These kind of tools enable the target-orientated and systematic approach with support to municipalities that commit to action while allowing a flexible and efficient local implementation a worth to learn from in order to enlarge the scope from energy to climate in general.

Support for the local sustainability workforce that could be improved with more available options to develop local strategies and climate action plans. The Dutch provinces believe that there is the possibility to create jobs in such transition. More communication with the citizens by the local authorities in which way these transitions are going to change the daily life of consumers. The expectation of the Dutch provinces is that these changes will be most noticed in the consumers' mobility and transportation options.

4. Education, research and innovation

a. On which cross-sectoral domains should R&D efforts focus in the coming decades? ? Is there a particular need for large scale deployment of certain innovative technologies? Is there a different role for authorities and private sector in support R&D and Innovation?

i. Modelling
ii. Financing
iii. Innovation

5. Actors

a. Do you have an example that you think is of particular importance to underline the role of such local and private sector actors in supporting the low carbon economy and energy transition?

i. The sectors that offer most potential are the services, residential, transport and energy sectors.

Some examples from CEMR members :

COSLA advocates for a more strategic role for Local Authorities in facilitating community/local ownership of renewable energy should be explored, to ensure that greater financial benefit is retained in communities.

In the Scandinavian countries municipal energy companies are common and often committed to the transition to renewable energy. Local Authorities can provide important skills and resources, such as technical expertise, project development, finance and political support.

The Swedish municipalities from SALAR have been instrumental in decarbonising the energy sector, through their energy companies. District heating, which covers half the total national heat supply, is now less than 5 % fossil, based mainly on bioenergy, waste to energy and residual heat. Less than 1% of household waste is land filled. Public procurement has increased the share of renewable energy in regional and local public transport to 87 % in 2017. Green bonds for green projects are expanding rapidly through the commonly owned Kommuninvest as well as by individual issuers. These four examples show the possibilities of local and regional government with proper insitutional instruments and a supportive national framework.

6. Adaptation

a. Which adaptation measures are of particular importance for your sector and why?

   i. Soft measures: recognition and policy coherence between the issue of climate adaptation and disaster-risk-reduction/ local resilience measures.
   ii. Financial investment in infrastructure and preventive measures. These infrastructures should focus on the insurances in case of natural disasters.
   iii. The overall roles and responsibilities between the state, municipalities, insurance companies, real estate owners need to be defined as on longer term the undefined situation will delay adaptation measures

7. Role of CO2 removal

a. What main barriers do you see currently preventing the large scale deployment of CCS, including on how to use it to generate negative emissions? What are the particular challenges related to biomass CCS? What type of CCU (Carbon Capture and Utilization) would lend itself to create long term storage? Are there other technologies that should also be considered? What policies do you think the EU should pursue to better help development and deployment?

   i. Most important is a CO2-prizing through ETS and carbon taxes that makes CCS and bio-CCS economically feasible. There should also be incentives for developing new and smaller scale technologies (for example pyrolysis making bio coal that can be used to improve soil fertility).
   ii. Conceptual understanding on carbon neutrality is limited and challenging the implementation.

Some examples from CEMR members (in any specific climate or energy targets in place) :

The Duch Provinces believe that the use of the forest can contribute. Not as a source for biomass but as a carbon sink for the storage of Co2 and on the basis of food crops or agricultural waste. The provinces are working for a long time to reach the goals of the energy transition. There is collaboration between local and regional governments however, to reach the goals for 2030 and 2050 the provinces need better conditions from the national government. The provinces believe that the financial costs of the transition have to be distributed fairly between consumers, industries and enterprises. The provincial government wants industries to make energy savings a priority and asks from the national government to stimulate these industries in doing so. The current legislation stalls a lot of energy projects. These restrictions in legislation have to be resolved by the government. The alternative energy is not yet able to compete with fossil fuels. It is necessary to create a level playing field for alternative fuels. The long term strategy of the provinces is to cope with the energy transition by mainly focusing on regional projects and local initiatives. The goals for the Netherlands are central but the manner in which provinces try to reach these goals is different per province

Norway: Transition to a low carbon society by 2050 mandatory by law; National target to cut 40 % compared to 1990 by 2030.

Seville: The current SECAP of the Covenant of Mayors goes beyond the minimum commitments signed with the European Commission by the city of Seville, establishing a reduction target of 54.28% of CO2 emissions for the year 2030 with respect to the base year 2005.

Cluj Napoca, Romania: The city aims by 2025 to make a full transition to a public transportation based on electric energy.

Swedish national target to be carbon neutral by 2045, including stepwise targets for the non-ETS and transport sectors.

Many French local and regional authorities are engaged in ambitious climate actions and policies, innovative projects sometimes with the support of EU. Through its "Zero Emission Valley" program, the Auvergne Rhône Alpes region aims to deploy 20 hydrogen refueling stations and 1 000 vehicles. This project sets the scene for the hydrogen technologies' industrialization phase, to be duplicated in France and abroad. It is also a strong path to reassert the role of hydrogen in both energy transition and local economic growth. The total budget of the project is 70 millions euros of which 10,1 millions euros coming from the Connecting Europe Facility (CEF) and 15 millions euros from the region. Orléans Métropole is engaged to go further national targets by developping a 100 % electrical public transport network progressively from next year on. Ile de France Region transport authority will propose by 2025 100 % clean bus fleet (9500). In order to develop the use of public transport and facilitate mobility of entire population, more than 30 local authorities have in France made the choice not to charge public transport users.

8. **Additional comments**

   a. **Adopting global climate agendas to achieve the objective through the localisation of the SDGs with the perspective of 2030 and 2050.** COP22 outcomes were linked to the implementation of the Sustainable Development Goals and the Urban Agenda of Habitat III. In the EU, most of the specific requirements for local governments will come indirectly via a new EU climate regime. The local and regional level can boost the implementation of these international agendas for 2030. As members of the UN, all European states

have agreed to take actions to reach the goals. The localisation process of the Agenda 2030 should therefore come with a real commitment to **strengthening multi-level and multi-sectorial alliances**. Europe and rest of the world are now looking also into 2050 decarbonisation agendas. Our national associations should all have a SDGs strategy which includes a stream on the localisation of SDGs. CEMR/Platforma offer their expertise to assist in drawing such policies. We also commit to include the 2050 horizon in our policy development affecting climate change policies.

b. Need for an improved EU policy and legislative process to mainstream local climate adaptation and mitigation action in the long term in EU and national policies and frameworks on adaptation: Appropriate long-term (looking into 2050 and beyond) frameworks on innovative adaptation and mitigation policies and instruments and mainstream climate into all policies are the key factors to mitigate and adapt to climate change. The EU can encourage Members States to strengthen the dialogue with subnational governments to some extent (requiring the close collaboration with such levels in the elaboration of the National Energy and Climate Plans). As part of the better regulation process, we request that the EU institutions and national governments give local authorities early recognition in the decision-making processes to also define this long-term strategy for 2050. Strong and unified positions can be achieved if the involvement of all levels of government takes place at an early stage and actions are localised. More attention must be placed in developing specific financial tools that are in line with local and regional organisation and capacity.

c. **Link to EU and international development related initiatives to climate: global climate agendas are only achieved with local action.** We need to encourage the link between the EU long term strategy at the local level and the international development agendas, in line with the principle of policy coherence for sustainable development. We call on the EU and the international community, which have ratified the Paris Agreement to facilitate Talanoa dialogue with towns, cities and regions in the Member States. This consideration should also come with the recognition and collaboration of global and regional programmes for cities' actions such as the Global Covenant of Mayors, and regional covenants such as European and Sub Saharan African Covenant. Giving cities and regions leverage to fight climate change in the long term (and also in the short term) is the way forward to make a difference on the ground. COP22's outcomes were linked to the implementation of the Sustainable Development Goals and the Urban Agenda of Habitat III. In the EU, most of the specific commitments for local governments will come indirectly via a new EU climate regime where the local and regional level can boost the implementation of these agendas for 2030. And also needed for 2050.

d. **The facilitation of the exchange of good practice and city to city cooperation at sub-national level, in Europe and globally:** The EU should intensify actions and its support to co-operation previously established among networks of cities and regions and joint action initiatives, exchanges of practice, projects, tools or high level events, targeting non UN State Actors and especially local governments. More alliances need to be constructed while respecting the competence and mandate of each one. . In that perspective support of European programmes such as Interreg or the twinning facility under the Covenant of Mayors are essential and must be further developed.

e. **Decentralised cooperation helps to reach decarbonised societies:** Decentralised cooperation should be systematically considered in climate mitigation (and adaptation) long term (and also short-term) discussions. The international community should promote this through its international development cooperation policy, particularly within the framework of the Global Covenant of Mayors or Covenant of Mayors in Sub Saharan Africa or actions by PLATFORMA strategic partnership for development and decentralised cooperation. Thousands of European towns and regions already cooperate with their peers to implement adaptation and mitigation projects in developing countries and on south-south, north-south and north-north decentralised cooperation.

9. Additional examples dealing with climate/energy with an impact in the long term

a. KS (Norway): A number of projects, like electrical buses, infrastructure for EVs, transition to electrical ferries, hydrogen fast passenger vessels, combined land-use and transport investments, climate budgeting In local governments and measures for circular economy.
b. FEMP (Spain): In Seville: transform the mobility system forward pedestrian and cycling mobility; Energy Efficiency projects in Schools (ERDF); Energy Efficiency projects in Public Local Markets´ buildings; Naves RENFE project : recovery of an industrial building transformed into an highly efficient public administrative building; Promotion of multi-modal transport through the construction of bicycle parkings in strategic points of the city to connect train, metro, buses, etc); Increase the share of urban trees plantation; Renewal of local fleet to more efficient vehicles within the local transport company (TUSSAM); Photovoltaic energy plant installed in public buses parkings; Co-Generation of electrical energy through biogas original from waste water management plant.
c. AMR (Romania) : In Cluj Napoca : Urban mobility: Development of ecological public transportation. The public transportation will be fully electric by 2025.
d. The vulnerability of certaint cities can far exceed that of a national average. In Seville the microclimate with a so-called Urban Heat Island translates into energy, economic, health and well-being costs that can put the viability of the city in crisis.
e. COSLA (Scotland) : COSLA supports domestic plans to raise targets for emission reduction from 80% by 2050 to at least 90% by 2050 and for a net-zero target to be set as soon as is practicable. To achieve total decarbonisation of the transport sector by 2050, we have called for even more ambitious domestic emission reduction targets. EU Funded Projects : http://www.energysavingtrust.org.uk/sites/default/files/LCTT%20Challenge%20Fund%20Round%202%20Project%20Descriptions.pdf
f. The Covenant of Mayors has been effective in capturing the ambition of Local Government but there needs to be more funding directly linked to SECAP development and delivering the climate actions and in the long term.

Contact

Eva Baños de Guisasola
Policy Adviser - Energy and Climate
Square de Meeûs, 1
B-1000 Brussels
Tel. +32 2 213 86 99
eva.banosdeguisasola@ccre-cemr.org

About CEMR

The Council of European Municipalities and Regions (CEMR) is the broadest organisation of local and regional governments in Europe. Its members are over 60 national associations of municipalities and regions from 41 European countries. Together these associations represent some 130 000 local and regional authorities.

CEMR's objectives are twofold: to influence European legislation on behalf of local and regional governments and to provide a platform for exchange between its member associations and their elected officials and experts.

Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.

www.ccre.org
www.twitter.com/ccrecemr