



**Consejo Superior de Colegios  
de Ingenieros de Minas**

**Comments to 2015 climate change strategy**

- Spanish Mining Engineers are competent on natural resources and in particular on energy resources, its conversion and utilization
- Energy sector releases GHG. But any EU strategy on GHG emissions reduction should also considers the importance of the energy supply security and that the energy prices are fundamental for the proper functioning of the economy
- The Mining Engineers welcome the principles of “*sustainable economic development*” and of “*minimizing the potential risk of carbon leakage between highly competitive economies*”, that are contained on the Commission Communication and ask the European Commission to introduce such principals on its proposals.
- The Mining Engineers considers that the US new energy policy, based on fossil fuels independence, has changed the world energy outlook and the EU Member States should reformulate its energy policy bases on the provisions of Title XXI of the TFEU.

**Question 1:**

*How can the 2015 Agreement be designed to ensure that countries can pursue sustainable economic development while encouraging them to do their equitable and fair share in reducing global GHG emissions so that global emissions are put on a pathway that allows us to meet the below 2°C objective? How can we avoid a repeat of the current situation where there is a gap between voluntary pledges and the reductions that are required to keep global temperature increase below 2° C?*

**Answer to Q1**

The Mining engineers consider that “*for ensuring that countries can pursue sustainable economic development while encouraging them to do their equitable and fair share in reducing global GHG emissions*” is necessary an important exercise of **transparency** and to **avoid the mistakes** made on the past:

- First, it should be avoided any **dogmatism** on climate change. The wording “Scientific advances have removed any reasonable doubt that we are warming the planet” do not represent the consensus of the Scientifics .The debate should be more free and open mind.
- The current Scientific Committee of the **IPCC** is not credible and there are evidences of political intervention. The Scientific Committee of the IPCC has to reestablish its credibility.
- The European Commission has to make a **transparent mid-term analysis** of the impact of it **energy/climate strategy**. The impact of such strategy on some EU Member



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Countries, as it is the case of Spain, could be a real **economic disaster**, without any benefit on climate behavior and security of supply. There are not consistent studies that support the famous 20/20/20 for 2020

- The Mining Engineers consider that for avoiding the repeat of the “**gaps**” of the current situation it is very important that the 2015 policy “**ensures that countries can pursue sustainable economic development**” as it has been mentioned on the Commission Communication. The new 2015 policy should be based on **sustainable development principles** and not on political wishes to become **world leader** on fighting against climate change.
- The European Commission should be transparent on the energy debate, and be proud on analyzing **the role of all the energy sources on security of supply and on sustainable economic development**, including fossil fuels, renewable and also opening the debate on **nuclear**.

**Question 2:**

*How can the 2015 Agreement best ensure the contribution of all major economies and sectors and minimize the potential risk of carbon leakage between highly competitive economies?*

The EU should adopt a **realistic approach** that recognize that it is much better a less ambitious objective but that is accepted for all major economies and sectors, than a more ambitious ones accepted by a reduced number of countries and that penalize excessively the EU economy. The global result of the first approach should be better and the potential risk of carbon leakage between highly competitive economies substantially reduced.

The EU has to take **conclusions from the past** and act on a more pragmatic way, avoiding the excessive leadership of the past. The 2015 approach should be much more **economic oriented** and any strategy should be subject of an ex-ante economic impact on the EU competitiveness. The EU should analyze the **market failures** of the uncontrolled growing of renewable energy and Spain is an excellent case for this analysis. The EU should analyze the distortion produced by renewable energy on the internal market of energy.

The EU should be **realistic** and recognize the important role of the **fossil fuels** on world energy supply. The EU has to work on the worldwide analysis and scenarios of the IEA and not on its restricted EU scenarios. The world is going to produce as much fossil fuels as it can and consequently it is no sense to penalize the production and consumption of fossil fuels on the EU, without similar approach on other developed economies.



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As a conclusion, the EU has to consider the energy policies of other highly competitive economies and has to work conjointly with them, putting on the same level the three objectives of all energy policy: **secure, sustainable and competitive energy**.

**Question 3:**

*How can the 2015 Agreement most effectively encourage the mainstreaming of climate change in all relevant policy areas? How can it encourage complementary processes and initiatives, including those carried out by non-state actors?*

The consideration of **energy security and the contribution of the energy to the competitiveness of the economy** are fundamental for the *mainstreaming* of climate change in energy policy.

The Mining Engineers **fully support** the wording of the Commission Communication “*Climate change policy can never stand alone but instead must support economic growth and the broader sustainable development agenda, as well as help create new employment opportunities*”.

Finally, concerning the revision of the Millennium Development Goals (MDG), it is important that the least developed countries had access to cheap energy and that the developed countries offer least cost solutions for each particular need.

**Question 4:**

*What criteria and principles should guide the determination of an equitable distribution of mitigation commitments of Parties to the 2015 Agreement along a spectrum of commitments that reflect national circumstances, are widely perceived as equitable and fair and that are collectively sufficient avoiding any shortfall in ambition? How can the 2015 Agreement capture particular opportunities with respect to specific sectors?*

As a matter of principle, the Mining Engineers consider that a less ambitious agreement accepted by all parties has much more efficient impact on climate change than an ambitious one accepted by a reduced parties. The Mining engineers recommendation to the EU negotiators is to be pragmatic and not dogmatic. Besides this, it is highly recommended to achieve an agreement with USA negotiators before the Summit.

**Question 5:**

*What should be the role of the 2015 Agreement in addressing the adaptation challenge and how should this build on ongoing work under the Convention? How can the 2015 Agreement further incentivise the mainstreaming of adaptation into all relevant policy areas?*



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The Mining engineers consider that the **adaptation measures** are much more efficient than **mitigation** ones and that the adaptation measures can give ever direct or indirect benefits. For example in Spain, it should be much more effective to fight against climate change by a national water distribution policy and by a forest protection policy than by an uncontrolled renewable energy promotion.

**Question 6:**

*What should be the future role of the Convention and specifically the 2015 Agreement in the decade up to 2030 with respect to finance, market-based mechanisms and technology? How can existing experience be built upon and frameworks further improved?*

The Mining Engineers are in favor of the promotion of economically sound **technological** solutions.

Regarding the market-based mechanisms, the Mining Engineers consider that the emissions trading system do not work correctly and needs more liquidity. In other case, the volatility of this market disturb the competitiveness of the EU industry.

The income from the ETS should be compulsory applied to sustainable energy innovation (including dissemination).

**Question 7:**

*How could the 2015 Agreement further improve transparency and accountability of countries internationally? To what extent will an accounting system have to be standardised globally? How should countries be held accountable when they fail to meet their commitments?*

No comment on this point

**Question 8:**

*How could the UN climate negotiating process be improved to better support reaching an inclusive, ambitious, effective and fair 2015 Agreement and ensuring its implementation?*

No comment on this point

**Question 9:**

*How can the EU best invest in and support processes and initiatives outside the Convention to pave the way for an ambitious and effective 2015 agreement?*



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The EU could support processes and initiatives outside the Convention to pave the way for an ambitious and effective 2015 agreement by the promotion of an energy strategy that foster the economic development of the Union.

The new US policy based on a competitive energy supply based on gas shale and the exploitation of new oil fields, including unconventional oil fields, have changed completely the world energy sector and the EU energy/climate strategy should be under debate. **The EU Member States, according with the provisions of the Title XXI of the Treaty on the Functioning of the European Union (TFEU), should formulate its energy policies.**

Madrid, June 25, 2013