

Feedback from: Cefic - The European Chemical Industry Council

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Submitted by

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User type

Business association

Organisation

Cefic - The European Chemical Industry Council

Organisation size

Medium (50 to 249 employees)

Country of origin

Belgium

Initiative

[Strategy for long-term EU greenhouse gas emissions reductions](#)

Achieving further significant GHG reductions means a transformation of our entire society, with strong implications for the EU Chemical industry and the consumers it serves. For a successful transition, the EU will need buy-in from its citizens and it will need to inspire other regions of the world.

Cefic will actively participate in the stakeholder consultation process, providing constructive input. We would like to start with some preliminary comments following the publication of the Commission roadmap, describing the key principles that should underpin the Commission's approach.

- Terminology

The EU Chemical industry strives to reduce its GHG emissions and to minimise "new" structure carbon (e.g. through recycling). We do not subscribe to such an objective as "decarbonising EU industrial production" and prefer talking about "low-carbon EU industrial production". Carbon is and will remain an essential building block of our products and high performance materials. We turn carbon into actual value for society.

- The EU needs a coherent policy framework

Cefic welcomes the inclusion of "Reindustrialisation" as a key element of the Commission's reflection. Climate ambition should go hand in hand with competitiveness and we would encourage the Commission to look at the impact on industrial value chains when assessing different emission reductions scenarios.

GHG emission reductions should remain the EU's central objective and existing contradictions in the EU climate and energy framework must be addressed. For example, the decreasing limit on EU's energy consumption towards 2030 could hamper industry's ability to reduce GHG emissions through electrification of processes and CO₂ valorisation. These two options may, at least in the first phase, require more energy.

- Investors need a stable and innovation-friendly policy framework

The roadmap mentions a minimum objective of 40% GHG emissions by 2030. However, following the adoption of the Clean Energy Package, the Commission mentioned the possibility to increase the EU emissions reduction objective to 45%, with possible implications for the Phase IV ETS target. Whilst the Chemical industry is committed to

the GHG reduction objectives, we need stable objectives in order to guide innovation and required investments, which are based on long-term cycles.

- Industrial GHG emissions must be tackled globally

EU industry emits around 7% of global fossil CO₂ emissions from industrial combustion (EDGAR 2016). All parties to the Paris agreement should adopt serious commitments if they want to keep global temperature rise well below 2 degrees. The EU should maintain a competitive industry if it wants a successful transition that can inspire other global economies.

- The EU strategy must be based on solid and transparent assumptions

Models that reflect technology developments, will inform Commission scenarios and ultimately the long-term strategy. Policy choices must be based on solid data in order to be “future-proof” and avoid rectifications at a later stage. Stakeholders, including from industry, can provide useful insight about technology perspectives, challenges of far-reaching electrification, possible evolution of global markets etc. They must have easy access to the assumptions underlying different models and have the possibility to enter into a real and mutually enriching dialogue with Commission experts about those.

- Wide stakeholder consultation will be beneficial

Every EU citizen and every sector of the EU economy will be impacted by the low-carbon transition. Each of them should become an actor of the transition. Cefic welcomes the wide stakeholder consultation launched by the European Commission, which is also addressed to individuals. Cefic hopes that the responses will usefully inform Commission proposals.