

## **SUMMARY OF ONLINE SUBMISSIONS: ENVIRONMENTAL NGOS**

*The views here represented are those of the submissions to the Commission's online consultation and do not necessarily reflect the opinions of the Commission.*

*Each bullet pointed entry has been proffered by at least one submission to the consultation; those expressed in bold font reflect commonly expressed views. The views expressed are in no particular order and are the author's paraphrasing of the submitter's position. The full documents can be found online at: [http://forum.europa.eu.int/Public/irc/env/action\\_climat/library](http://forum.europa.eu.int/Public/irc/env/action_climat/library)*

**Number of submissions: 30** (including 3 from Climate Action Networks in Europe, the USA and Uganda; 3 submissions were received from the European Renewable Energy Council)

### **Summary**

The EU must provide leadership both politically and through domestic action. Reengaging the US with the climate process should be a priority. A staged approach for developing countries was advocated, with the need for financial support highlighted.

The 2°C target was generally welcomed as a peak temperature increase, although there were calls to reduce temperatures beyond this peak. The concentrations of GHGs required to achieve the goal were subject to disagreement, although all lay between 400-500ppmv CO<sub>2</sub> equivalent. The need for defined targets was generally agreed with some suggesting different targets for fossil fuel and LULUCF emissions.

Renewables were widely held to be the only long term option and there were calls for binding targets for their uptake and the removal of subsidies for competing technologies, such as nuclear and fossil fuels. Further R&D support for renewables was advocated by many. Energy efficiency measures were also favored. Nuclear was dismissed as unacceptable on security and waste grounds. Sinks were also strongly disfavored. There were calls to ban fluorinated gases and to tackle emissions from the aviation industry.

The competitive advantage of producing new technologies was highlighted as a benefit of action now, as was the likelihood of greater cost in acting later. The ancillary benefits on health and air pollution were proffered as additional reasons for early action.

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### **1) Is it important for the EU to continue to show leadership on addressing climate change?**

- **It is very important that the EU actually provide leadership on climate change**, including supporting renewables, and the continued use of fluorinated gases
- The EU bears heavy responsibility for climate change and so must act to mitigate its effects

- **It is extremely important that the EU continues and strengthens its leadership role**
  - The EU is in a position to pressure the US into more meaningful participation in combating climate change
  - **This must be backed up by action at home**
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2) On the basis of the EU's 2°C long-term objective, what objectives should the EU set for global and EU climate change policy (including targets, timeframes and pathways for emission reductions)?

- **The 2°C target is welcomed as a maximum temperature increase**
  - **EU emission reductions of 80% by 2050 need to be ensured to meet the 2°C long term objective**
  - The 2°C needs further scientific elucidation: the scientific case can underscore that US inaction puts in breach of its UNFCCC commitments
  - The US should be mobilized by others taking action
  - **Warming should be reduced as fast as possible from this 2°C peak**
  - A peak of 1°C is proposed, but 2°C is acceptable
  - The EU should act to reduce deforestation
  - A stabilization at 400ppmv of CO<sub>2</sub> equivalent is a necessary policy goal
  - Global emissions should be stabilized at 450ppmv CO<sub>2</sub> equivalents
  - A stabilization at between 400-450ppmv of CO<sub>2</sub> equivalent should form the basis of negotiations
  - A stabilization at 450-500ppmv of CO<sub>2</sub> equivalent is a necessary policy goal
  - Although near-term goals are easier to frame rationally, there needs to be a policy compass that points towards longer term goals
  - All policies should be compatible with sustainable development objectives
  - The precautionary approach should be taken
  - **The aviation sector must be subject to fuel taxes, at least for EU domestic flights**
  - The aviation sector must become part of emissions trading regimes
  - Each nation's commitments must be a direct function of its population size, actual net emissions and its capacity to produce and implement policies and measures for mitigation
  - A community of willing countries should move within the UNFCCC framework to form a pioneering Community for Global Climate Protection (CGCP) to accelerate mitigation action
  - Negotiations of this CGCP should be fast tracked into a non-stop negotiation and at ministerial level, until agreement is reached
  - **The US should be allowed to renegotiate their target, if it means that they will participate meaningfully in future climate action, or alternatively, shift their baseline to another year**
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3) What type and level of participation should the future climate change regime seek from developed and developing countries, what should be the timeframe for such participation and what should be the contribution from the EU and other countries?

- Environmental and economic sustainability should be cornerstones of climate policy
- Climate policy in developing countries should include issues of development eg technology, trade and good governance
- **Global active participation should be sought on the basis of “common but differentiated responsibility and respective capabilities”**
- **Developing countries will require support to limit their emissions**
- Climate policies should be integrated into all EU activities and agreements, eg Cotonou, the Euromediterranean Partnership etc)
- **Morally, those that did most to cause climate change should do the most to mitigate it**
- **Countries should participate on three tracks: Kyoto, greening (decarbonisation) and adaptation, participation should be defined by measures such as per capita emissions and historical responsibility**
- **There must be a focus on re-engaging the US in the post-2012 regime**
- The US must be encouraged to mitigate at home
- **The EU must not hesitate to set emission reduction targets, even in the absence of participation from other major emitters**
- Development aid should promote climate friendly energy systems in developing countries
- The EU should make bilateral agreements on renewables, energy efficiency, forest conservation/ restoration and decarbonisation in exchange for debt cancellation
- As a first step, the EU should achieve global agreement that to protect the atmosphere, commitments need to be broadened beyond industrialized nations
- Developing countries should receive assistance for the impacts of climate change
- The future regime should be equitable, based on historical responsibility and the capacity to reduce emissions

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4) Which technical solutions should be allowed or promoted (eg renewable energy, nuclear energy, C sequestration, C capture and storage)?

- **Renewables, including PVs, wind, geothermal, small hydros and biofuels should be supported by the EU, particularly in developing countries**
- **Nuclear energy is unacceptable**
- **Energy efficiency should be promoted**
- Energy conservation should be promoted
- **Sinks should be discouraged through lack of permanence and through lack of real emission reductions**
- CCS is a new, unproven, technology that will unlikely be able to compete with renewables because of the high cost
- CCS is contrary to the London Convention and, in the NE Atlantic, to the OSPAR Convention

- **Fluorinated gases should be rapidly phased out**
- **Market barriers to the uptake of renewables should be removed, including fossil fuel and nuclear subsidies**
- **Export Credit Agencies should be reformed to give priority to renewables**
- Technological solutions will support necessary societal changes
- A large range of environmentally-sound technological solutions should be available
- **R&D funding into renewable energy technologies should be increased**
- Wind is a proven technology that should play an increasingly significant role in the energy supply
- Nuclear, dams, CCS and “clean” coal have devastating non-climate impacts
- No technology should be ruled out
- Tropical deforestation should be averted
- Hydrogen should be used as a bridging technology between the present fossil economy and the renewable future
- The North Sea basin has a huge potential for CCS
- Countries must meet at least half of their commitments through domestic action
- Transportation needs to be reformed
- Industry must use clean technologies in their processes

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[5\) Should the future global climate regime maintain the key elements of the Kyoto Protocol, including the Kyoto Mechanisms \(JI, CDM and emissions trading\) and what other elements should such a regime contain?](#)

- Kyoto should be the foundation of post-2012 climate policy
- The impacts of CDM projects should be examined closely: large forest plantations or large hydro projects may not be appropriate to the host country
- Existing financial and investment mechanisms, both public and private, should promote renewables
- New financial and investment mechanisms, both public and private, should promote renewables
- Policies need to reflect the true costs of climate change (the polluter pays principle should be invoked)
- There should be strengthened emissions caps for all sectors
- **Quantified emission reductions should form the backbone of the future regime**
- Kyoto Mechanisms are a useful way to lower mitigation costs
- **CDM projects should focus on renewables and other projects that provide social benefits**
- **LULUCF provisions are flawed and should not be included in the future regime**
- **There should be additional flows of adaptation, technology transfer and mitigation funding to developing countries**

- Since the US was such a key driver of these mechanisms, retaining the mechanisms will facilitate building support for US re-entry and for joining potential domestic regimes with the international approach
- The compliance regime should be strengthened
- Sanctions should be an available disincentive for non-compliance
- Market mechanisms should be put in place, but these should not be fully technologically neutral
- **There should be binding renewables targets**
- Emissions trading should not be seen as a substitute for environmental taxes or policies that promote renewables
- Separate targets should be set for LULUCF and fossil fuel emissions so that one cannot be used to offset the other
- EU should provide educative support for developing country officials, negotiators and researchers to allow them to participate effectively in climate negotiations
- Cap and trade is one possible framework in the context of market mechanisms
- **Absolute emission reduction targets are essential**
- ‘Best efforts’ approaches have had limited success in previous international regimes
- Policies and measures need to be subject to monitoring and accounting for their impacts on the atmosphere, progressive adjustments in targets should be made in line with these data
- Sector-specific targets should be considered
- The best solutions include taxation and reinforcement of emission reduction targets for economic sectors
- The Kyoto mechanisms need to be simplified and clarified to encourage renewable energy projects and carbon reduction finance
- The public should have better and easier access to energy efficient technologies for home and office use
- Contraction and convergence should be the basis for climate policy on grounds of precaution, equity and effectiveness
- Commitment periods should be lengthened
- More GHGs, including ozone and soot should be included in emissions reduction targets
- Energy efficiency should be promoted and be granted fair access to the electricity grid
- Subsidies should be removed from fossil fuels

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6) What are the costs of taking future action on climate change, including competitiveness impacts, and how can/ should impacts be addressed?

- **Studies indicate that costs of inaction are higher than those incurred by acting now**
- Figures for costs are hard to acquire, but previous environmental agreements indicate that industry tends to exaggerate the time and cost of compliance: few companies have high energy costs compared to total turnover
- Carbon leakage when applying regional targets needs to be militated against
- Costs of action should be juxtaposed with the costs of inaction

- More extreme weather events are more likely

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7) What are the benefits of taking further action on climate change, including avoided damages, competitiveness impacts and ancillary benefits, and how can/ should these be encouraged or optimised?

- **Early climate action in Europe will provide a competitive advantage in new technologies**
  - Early climate action in Europe will promote job creation
  - Early action will avoid the costs of climate change
  - **Climate mitigation will have ancillary benefits in health and air pollution**
  - An increased use of renewables will reduce dependence on energy imports, strengthening security of supply
  - Market conditions should be set to promote low carbon solutions
  - New promising technologies should be given targeted support to promote technology learning, if their market expands
  - Acting to reduce the impacts of climate change will have benefits in biodiversity conservation
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