

Letter to Deputy Ambassadors on a Governance framework compatible with the Paris Agreement

Brussels 23 November 2017

Dear Deputy Ambassador,

This Friday, 24 November, you will be discussing the proposed Regulation on the Governance of the Energy Union. With that in mind we are writing on behalf of our EU-wide network to highlight those aspects of the draft legislation that we consider critical to effective implementation by the EU of the Paris Agreement.

By signing the Paris Agreement the EU has committed itself to pursuing efforts to limit global temperature rise to 1.5 degrees C. It has also committed to review the level of ambition of its climate action every five years, under the Paris Agreement's review cycle.

In this context, and while we welcome the proposal to rename the legislation in question the "**Regulation on the Governance of the Energy Union and Climate Action**" - a change that emphasises the need for an integrated approach – the latest proposed text from the Presidency (dated 17 November) exhibits three major shortcomings:

1. Inconsistency with long term climate objectives and the review cycle embedded in the Paris Agreement;
2. Inconsistency as regards the approaches taken to ensuring delivery of the EU's 2030 targets for renewable energy and energy efficiency; and
3. Inconsistency between long term strategies and short term planning

To address these inconsistencies, we urge you to amend the draft text as follows:

Consistency with the long term objective and review cycle of the Paris Agreement

- Make it clear in Article 1 that the Regulation establishes a stable and flexible framework to **implement the objectives of the Paris Agreement**.
- Embed in Article 1 an EU 2050 GHG target of **net zero emissions within the EU by 2050 at the latest**, and amend the reference to 80-95% in Article 14 accordingly. This to provide clear and stable guidance for EU and Member State planning.
- **Amend the dates and provisions in the review clause (Article 38)** to request a report within six months following each global stocktake under the UNFCCC, accompanied by proposals to enhance the Union's climate and energy action as appropriate.
- **Revert back in Article 13** 'Update of the integrated national energy and climate plan' to the original language "**to reflect an increased ambition**"

Consistency as regards the approaches taken to ensuring delivery of the EU's 2030 targets for renewable energy and energy efficiency

- Reinstate in Article 3 **linear trajectories** that ensure the credibility of the EU's 2030 targets.
- **Apply the same principles for delivery of the energy efficiency target** as for the target for renewable energy, guided by anchoring the Energy Efficiency First principle. Energy efficiency is fundamental for decarbonisation and failing to put in place a robust framework to deliver it makes it harder to deliver decarbonisation goals.

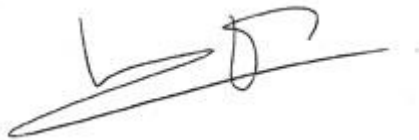
Consistency between long term strategies and short term planning

- **Require the long term strategies to be developed *in parallel*** to the NECPs and to the same timetable, not afterwards;
- **Introduce a template for the long term strategies**, to complement that for the NECPs. This to enable all Member States to produce comparable long term strategies that meet a certain level of quality and ensure the long term strategies and NECPs are consistent. The amendments tabled in the European Parliament on this matter gives good guidance; and
- **Apply the same process for drafting, assessing and monitoring** long term strategies as for the NECPs.

We believe the above elements are key to ensuring the Governance framework supports the EU in delivering on its commitments under the Paris Agreement, and we urge you to argue for them strongly in your discussions with other Member States this Friday.

We would be very happy to discuss these issues with you further before then if you would find that helpful.

Yours sincerely,



Wendel Trio
Director, Climate Action Network (CAN) Europe



Climate Action Network (CAN) Europe is Europe's largest coalition working on climate and energy issues. With over 140 member organisations in more than 30 European countries - representing over 44 million citizens - CAN Europe works to prevent dangerous climate change and promote sustainable climate and energy policy in Europe.