

Consultation publique de la Commission Européenne

«Towards a comprehensive and ambitious post-2012 climate change agreement »

Projet de réponse UFE V4

Historique

- Draft rédigé sur la base des contributions des membres du GT CO2
- Discuté et amendé lors de la réunion du GT CO2 du mercredi 08/10/08
- En cours de diffusion à la Commission Production et à la Commission Affaires Européennes

→ Rappels :

Consultation non obligatoire

Date limite d'envoi: vendredi 10/10/2008

Pour plus de détails concernant le questionnaire cf. en Annexe : « How to submit your contribution », « Privacy statement ».

Objective of the consultation

At the 2007 UN Climate Change Conference the Bali Road Map was agreed. It foresees to adopt a new agreement by COP15 at the end of 2009 in Copenhagen reflecting a shared vision based on reinforced mitigation commitments on the side of developed countries through mid-term targets, as well as enhanced collaborative action on mitigation and adaptation with the support of technology and finance for developing countries.

Following up on in its Communication "Limiting Global Climate Change to 2° Celsius: The way ahead for 2020 and beyond" and the EU Spring Council conclusions from March 2007, the European Commission seeks detailed views of stakeholders on the different building blocks of the Bali Road Map that would enable the world to limit global warming to no more than 2°C above pre-industrial temperatures and based on the key principle of common but differentiated responsibilities and respective capabilities. As a result, developed countries shall continue to take the lead and commit to significant and absolute emission reductions by 2020 whereas a substantive deviation of greenhouse gas emissions from business as usual by developing countries, and notably by emerging economies, will also be needed. Part of this enhanced contribution will need to be supported by the global carbon market as well as other positive incentive schemes, together with further access to technologies and finance. The agreement will also need to ensure that appropriate action is taken to reduce emissions from international air and maritime transports as well as deforestation and forest degradation. Furthermore, already with an increase of temperature up to 2°C there will be significant adverse effects of climate change necessitating enhanced action on adaptation.

The aim of this consultation is to gather views on a number of critical issues related to the global post-2012 climate change agreement.

1. Background information

Please answer the following questions about your profile.

- I reply on behalf of an organization/ an institution/an individual

I reply on behalf of UFE – Union Française de l'Electricité – **Representing the whole electricity sector in France.**

- **What is your country of residence/country where your organization or institution is based?**

France.

2. The climate change challenge - a shared vision for the 21st century development

The Bali Action Plan agreed on a shared vision for long-term cooperative action, including a long-term global goal for emission reductions, to achieve the ultimate objective of the Convention, stabilizing greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. The EU determined already in 1996 its long term goal of limiting the global average temperature increase to no more than 2°C above pre-industrial levels. To achieve this, in 2050 global greenhouse gas emissions should be reduced by at least 50% compared to 1990 levels.

- **Would this aspirational long term goal be appropriate in the light of the 2007 IPCC reports and latest scientific knowledge? (max 4000 characters) (optional)**

Preliminary comment: although all the question do not directly belong to the scope of competences of the French Union of Electricity, an answer has been given when possible.

The French Union for Electricity recognizes the urgent need to face climate change by limiting the global temperature increase to no more than 2°C above pre-industrial levels through the reduction of at least 50% of the global greenhouse gas emissions compared to 1990 levels until 2050.

We believe that this long term goal is appropriate in the light of the 2007 IPCC reports. Indeed, they give a good view of the important risks linked to further accumulation and therefore to further delaying action. It would be counter-productive to delay action : the longer we wait the more expensive the actions will be.

Nevertheless, in order to achieve this goal, a worldwide agreement is required, including participation of all the sectors and of all the most emitting countries: the climate is a world asset and global warming is a global risk. The challenge cannot be met by industrial groups only, and more specifically by energy groups only.

Moreover, a stable and long term goal is essential for the electricity sector. The conditions of the future global context are going to affect our investments decisions. As their lifetime spans from 20 to 60 years, we need visibility and a stable framework. A long term global emissions pathway must be in place as soon as possible and preferably by end 2009. This pathway, as far as the electricity sector is concerned, should count with available technologies and with technologies under development, in order to reach the 2050 objective at an affordable cost for the economy.

- **Is there a need for other elements to be part of the shared vision in order to ensure the transition to a sustainable low carbon economy? (max 4000 characters) (optional)**

In addition to **the long term goal**, paths to achieve it have to be designed and intermediary goals have to be defined.

The shared vision helping to define these paths could include:

- what and where are the biggest sources of emission,
- what can be made in the short term and what is to be made later.
- which policy decisions can ease action in the short term.

Moreover, in the electricity sector, no technology option should be neglected to ensure the transition to a low carbon economy, including 4th generation of nuclear power stations. A strong commitment to support the deployment of existing technologies that can contribute to reducing global CO2 emissions is an essential part of the shared vision.

An international agreement on climate change, building on the UNFCCC and the Kyoto Protocol, can foster widespread action, provide context for local actions and decisions (e.g. target setting, policy

instruments) and incentivise the necessary technology development to deliver emission reductions. To achieve this we support:

- An international GHG emissions market designed for appropriate sectors, most likely comprised of a variety of linked national "cap-and-trade" systems, together with a family of large-scale project mechanisms born out of the current Clean Development Mechanism (CDM). This will establish a widespread market price for emitting CO₂ (and other GHGs) into the atmosphere.
- The development of an international framework that simultaneously fosters emission reductions across all sectors of the global economy. Important sectors / economic areas to include are:
 - a) Buildings and commerce related sectors.
 - b) Transport.
 - c) Sectors involved in the use or production of non-CO₂ GHGs (e.g. HFCs, N₂O, CH₄ etc.);
 - d) Land use (including agriculture and forestry)
- International recognition of Carbon Dioxide Capture and Storage (CCS) as an important future technology for the production of electricity with fossil fuels, together with an enabling environment to hasten its demonstration and deployment. Recognition of and building convenient approaches to help the maturation of this technology, international access to financial incentives to enable the demonstration phase.
- International recognition that the use of renewable energy is essential to contribute to managing global emissions.

3. Mitigation commitments by developed countries

The EU is of the view that developed countries should continue to take the lead by committing to collectively reducing their emissions of greenhouse gases by 30 % by 2020 compared to 1990. They should do so also with a view to collectively reducing their emissions by 60 - 80 % by 2050 compared to 1990.

- **What should be the criteria for allocating emission reduction efforts among developed countries, considering also the need to ensure the "comparability of efforts" as agreed in Bali? (max 4000 characters) (optional)**

This is mostly a political question, which is to be addressed by policy makers.

Nevertheless, we believe that allocation of emission reduction efforts should be based on the mitigation potentials within the major sectors (industry, energy, transport, agriculture /forestry, domestic and commercial sectors) in the target countries, taking into account efforts already made.

While recognizing the historical responsibility of the developed countries, efforts in "emerging" countries should also be made, because of:

- the need for equitability in sharing of efforts : the current Annex I countries' share of emissions is decreasing, while the share of BRIC countries is increasing quickly;
 - the degree of development of some countries cannot be frozen at the 1990 development level.
- As a result there could be 3 types of countries commitments:
- current Annex I countries with increased commitments ;
 - most advanced developing countries : targets in reducing the growth of their emissions to a maximum cap;
 - less developed countries : a target defining a maximum of emissions, incentivising them to act on those emissions.

4. Mitigation actions by developing countries

The EU recognizes the need for enhanced contribution by developing countries, whereby economically more advanced developing countries contribute adequately according to their responsibilities and respective capabilities.

- **What type of mitigation actions should developing countries undertake? How should these be measured, reported and verified? What should be the scale and legal nature of these actions? How should differences in responsibility and capability of different developing countries be taken into account? (max 4000 characters) (optional)**

Taking into account their current development level (and not that of 1990), developing countries should contribute to the mitigation effort.

As written in the answer to the previous question, while recognizing the historical responsibility of the developed countries, efforts in “emerging” countries should also be engaged, because of:

- the need for equity in sharing efforts : the current Annex I countries’ share of emissions is decreasing, while the share of BRIC countries is increasing quickly;
- the degree of development of some countries cannot be frozen at the 1990 development level.

As a result there could be 3 types of countries commitments:

- current Annex I countries with increased commitments ;
- most advanced developing countries : targets in reducing the growth of their emissions to a maximum cap;
- less developed countries : a target defining a maximum of emissions, incentivizing them to act on those emissions.

The long term vision should be to establish an international regime, in which all sufficiently developed countries participate, and through which a carbon market could emerge for the appropriate sectors:

- all developed and more advanced developing countries through cap and trade, and project credits (CDM-like);
- all developing countries through emission reducing projects (like the CDM), or a sectoral crediting system.

Mitigation actions of very low or zero cost should be the priority in all countries and can be undertaken in developing countries such as :

- review tax and subsidy systems so that they are not contrary to reducing emissions;
- development of policies in the energy efficiency areas;
- waste recycling for energy generation .

- **To what extent and how should those actions be supported by technology and financial assistance from the developed countries? What kind of supporting tools could be developed at the international level to support domestic action and should there be respective roles for the public and private sector, including the carbon market? (max 4000 characters) (optional)**

Considering the emissions reduction potential of developing countries, the carbon market could certainly have a role to play, by financing emissions reductions through projects or programs.

The existing Clean Development Mechanism (CDM) must be strengthened and expanded into a family of mechanisms designed to underpin sector emissions reductions in developing countries and drive the deployment of key technologies.

The use of CDM in the EU ETS after 2012 should be extended.

Transnational sector approaches, including technological assistance to developing countries, could be developed in large industrial sectors (steel, cement, chemical industry, agriculture, air and maritime transport...).

- **How should technology and financial assistance by developed countries to developing country mitigation and adaptation actions be measured, reported and verified and should they be compared? (max 4000 characters) (optional)**

In order to guarantee transparency, monitoring and reporting tools are to be implemented.

5. Carbon market

- **How should the existing Clean Development Mechanism and Joint Implementation be improved in order to increase their environmental integrity and effectiveness? (max 4000 characters) (optional)**

Regarding the Kyoto flexibility mechanisms, the following points could be improved:

- the whole additionality issue should be revamped;
- simplification and acceleration of the procedures ; clarity of the different roles (no unnecessary reviews, clear roles for the Secretariat, the Executive Board, the DOEs, ...), especially in order to develop a lot of small emissions reduction projects (for instance domestic projects);
- methodologies should be more generic and apply to larger classes of projects (more systematic approach);
- for some types of projects (like energy efficiency) programmatic approaches should be encouraged.

Moreover, the use of CDM in the EU ETS should be extended.

- **What new market mechanisms could be developed to improve the effectiveness of carbon market? (max 4000 characters) (optional)**

[Pas de réponse UFE]

6. Carbon leakage

- **How could the delocalisation of emissions from developed countries with binding emission caps to other parts of the world be minimized? (max 4000 characters) (optional)**

[Pas de réponse UFE]

7. Sectoral approaches

- **What type of sectoral approaches could effectively contribute to global emission reductions? (max 4000 characters) (optional)**

[Pas de réponse UFE]

8. Emissions from international air and maritime transport

- **How could emissions from international air and maritime transport be effectively addressed? (max 4000 characters) (optional)**

[Pas de réponse UFE]

9. Emissions from deforestation and forest degradation

- **What should be sources of financing emission reductions from deforestation and degradation? (max 4000 characters) (optional)**

Deforestation and forest degradation is a very important climate change issue, as it is responsible for 1/5 of the worldwide GHG emissions. Most of them come from developing and least developed countries. Deforestation and forest degradation have other very damaging impacts on environment and biodiversity. For this reason the tools that could contribute to reduce its impact should be reinforced. A planned and sustainable management of the forests is the first necessary action. It should be better organized and monitored at a national level.

More financial means should be allocated to the programs which finance projects against deforestation and forest degradation, in the existing international funds dedicated to developed countries and environment questions.

Another option could be to reinforce the role of projects that aim at reducing deforestation in the CDM. Europe could set a priority on defining some type of CDM projects of which carbon credits could be used in the EU ETS.

Also, for all European companies trading inside and outside Europe wood or wooden products, strict traceability and quality regulations should be set, that would include monitoring and publication on emissions from transport.

- **How financing of emission reductions from deforestation and degradation should be monitored taking into account non-permanence, leakage and liability issues? (max 4000 characters) (optional)**

In order to be efficient, the greatest transparency in the use of the funds must be provided. The financing of emission reductions from deforestation and degradation could be monitored by the funding organism, in close relation with the States and the local organizations where the project take place.

10. Adaptation needs and support for most vulnerable countries

- **What mechanism should be used to finance cost-efficient adaptation action in the most vulnerable countries, in particular LDCs, SIDS and African countries? (max 4000 characters) (optional)**

Mitigating climate change should not prevent from adapting to its impacts, today and in the future. The two strategies must be held together, as two complementary and essential ways of facing this crucial issue.

More financial means should be allocated to the programs which finance adaptation actions in the existing international funds dedicated to developed countries and environment questions. This is particularly true regarding the United Nations Adaptation Fund, launched at the last Bali conference and which is only supplied for the moment by a tax on the CDM.

- **How should the effectiveness of adaptation measures be monitored and assessed? (max 4000 characters) (optional)**

A number of criteria defining the "Effectiveness of adaptation measures" could be listed in order to have a common and objective way of assessing the measures as well as comparing them if needed.

- **What should be the catalyst role of the UNFCCC, considering notably the role and contribution of other relevant international organisations addressing the impacts of climate change on their area of competence? (max 4000 characters) (optional)**

Until now, the UNFCCC is still the only place where countries talk globally about climate change. It should remain the coordinating body. For example ICAO (International Civil Aviation Organisation) and IMO (international Maritime Organisation) are responsible for the mitigation of emissions in the air and sea transport sectors, under the Kyoto protocol.

The UNFCCC should enforce this so that action is taken in all regions and not only in Europe. Because it is not specialized in one specific topic, it could sum up and list all the actions held by the other relevant international organizations addressing the impacts of climate change on their own area of competence, so as to recommend which axis should be further developed. For that, these organizations could report to the UNFCCC on their projects.

11. Technology cooperation

- **Is there a need for specific support schemes for the development, demonstration or deployment of certain technologies? If so, for which ones and how should these be structured? (max 4000 characters) (optional)**

New technologies that are not required by law, or which implementation is not in the financial interest of the industrials (in the short or medium term) are not likely to be widely developed. The implementation of a technology that is not at a commercial scale of development cannot be made mandatory by Law (either National or European). Therefore, the best way to favour the development of new technologies, before a possible enforcement by Law, is to incentivize the early movers.

Some technologies are promising and not yet totally mature: Carbon Capture and Storage, 4th generation of nuclear power plants, photovoltaic systems... These technologies can benefit from support from funds which would be fed by appropriate policies and measures.

- **How to strengthen enabling environment for the deployment of the many existing clean technologies? (max 4000 characters) (optional)**

The EU ETS is a concrete example of the way the carbon market can support the deployment of mature technologies (CCGT, renewable energy, end-use energy efficiency including the role of services, ...).

Moreover, a governing scheme should be erected, based on common base of indicators covering the various clean technologies (ton of CO₂, SO₂, NO_x or dust abated by the technology). The level of incentive can then be based on the level of abatement linked to each technology.

Priorities can be defined by the Commission at the European level, and the relevant technological areas clearly identified.

12. Finance and investment

- **How should additional public support be organised and which should be the three top priority areas for financial support in developing countries? (max 4000 characters) (optional)**

Public support could come from funds which would be fed by levies on the carbon market, revenues from auctioning of the allowances, etc.

An efficient leverage could also be the development of the use of micro-finance for supporting micro-entrepreneurs. Institutional support can help raising funds for Micro-Finance Institution, relay for accessing numerous projects.

Penalties for government not reaching their targets could also be defined (within WTO rules) and would constitute the base for a Fund to support least developed countries.

The three top priority areas for financial support in developing countries shall be :

- development of renewable sources of energy (solar electricity in rural area, wind energy resources ...)
- reducing emissions linked to deforestation
- adaptation for very poor areas (water access...)

Using support to change people's consuming behaviours, as a source of emission reductions, should be applied both in developed and developing countries.

- **How could private sector be involved in mobilising additional finance? (max 4000 characters) (optional)**

The private sector will invest if a reasonable return on investment can be expected. Additionally, private sector needs legislative framework stability to be able to include the costs in their business plan. Such a commitment requires a stable political commitment.

Large carbon funds could be an interesting alternative to project by project like CDM funding. It would allow financing programs like global solar development in a country or in a geographical area, efficiency programs centred on providing the most efficient technologies association in a trans-sectoral approach (example : efficient buildings, efficient planning combining building, transport, energy issues etc...

13. Compliance and enforcement of the new agreement

- **How should it be ensured that countries will comply with their commitments? (max 4000 characters) (optional)**

[Pas de réponse UFE]

Annexe

How to submit your contribution

We welcome contributions from citizens, organisations and public authorities.

In the interests of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct.

If you are a **Registered organisation**, please indicate the name and address of your organisation and your Register ID number on the first page of your contribution. Your contribution will then be considered as representing the views of your organisation.

If your organisation is not registered, you have the opportunity to Register now.

Responses from organisations not registered will be published separately.

Received contributions may be published on the Internet. It is important to read the specific privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with.

Consultation report will be published after the end of public consultation.

Please bear in mind the following guidelines when submitting your comments:

-The session time is limited to 1 hour 30 min, so you need to complete your reply within that time. Be careful not to exceed this time limit as your reply will be lost.

-If your replies need to be co-ordinated internally, we suggest that you print the blank questionnaire, circulate it to all the contributors, and prepare your reply off-line. You can then designate someone to input the replies on-line.

-After you have clicked on "submit", you should get a confirmation that your reply has been recorded. If this does not happen and the survey page is reloaded instead, please check that you have filled in all the compulsory questions correctly. You should see an error message next to the question if something is wrong or missing.

Privacy statement

1. Purpose and scope of personal data processing

The objective of this public consultation is to collect views on a number of critical issues related to the global post-2012 climate change agreement. Following up on in its Communication "Limiting Global Climate Change to 2° Celsius: The way ahead for 2020 and beyond" and the EU Spring Council conclusions from March 2007, the European Commission seeks detailed views of stakeholders on the different building blocks of the Bali Road Map that would enable the world to limit global warming to no more than 2°C above pre-industrial temperatures and based on the key principle of common but differentiated responsibilities and respective capabilities.

2. What personal information do we collect?

The purpose of processing the personal data is to manage the administrative handling of replies to this consultation and the publication of the contributions received, including requesting clarification if necessary on the information supplied, publication of the result, feedback and follow-up on the consultation.

Received contributions, together with the identity of the contributor, will be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account.

Identification Data

The following data are collected: profile of the respondent (private citizen, public authority, academic institution/think tank, national or international NGO, organisation representing the private sector,

other), name of the organisation, country of residence. These data serve to identify the respondent for the purpose of the questionnaire.

Technical information

The system uses session "cookies" in order to ensure communication between the client and the server. Therefore, your browser must be configured to accept "cookies". However, it does not collect any personal or confidential information of any kind, nor any IP address from your PC. The cookies disappear once the session has been terminated.

Your data will be handled in conformity with Regulation (EC) N° 45/2001 on the protection of individuals with regard to the processing of personal data by Community Institutions and bodies and on the free movement of such data.

3. Who has access to your information and to whom is it disclosed?

The answers will be analysed by DG Environment, Unit C.1: 'Climate strategy, international negotiation and monitoring of EU action'.

The results of the consultation will be used to inform the development of the Commission's position on the global post 2012 climate change agreement. Once finalised, the consultation report will be published on the web-site of DG Environment. No personal data will be published together with the report.

The European Commission will not share data with third parties for direct marketing.

4. How do we protect and safeguard your information?

Immediately after the submission of the form, your replies are recorded in a secured and protected database hosted by the Data Centre of the European Commission. The database is not accessible from outside the Commission. Inside the Commission the database can be accessed using a UserId/Password.

Access to the application is via a non-encrypted connection using the normal http protocol.

5. How can you verify, modify or delete your information?

You have no direct access to your personal data stored in the database. If you wish to modify or delete your reply, please send a message to the contact point provided in the form.

6. How long do we keep your data?

All data will remain in the database until the results have been completely analysed and will be rendered anonymous when they have been usefully exploited, and at the latest after 3 years from the end of the consultation. Personal data in this database may be used again for further consultation and exchange of information on this same subject.

7. Contact Information

Questions or requests concerning the information submitted by you with this questionnaire should be sent to: ENV-CLIMATE-CHANGE-POST2012@ec.europa.eu.