

**Opinion**

**of the Foreign and European Union Affairs Committee  
of the Senate of the Republic of Poland**

**on the Proposal for a Regulation of the European Parliament and of the Council  
on binding annual greenhouse gas emission reductions by Member States  
from 2021 to 2030 for a resilient Energy Union and to meet commitments under  
the Paris Agreement and amending Regulation No 525/2013 of the European Parliament  
and the Council on a mechanism for monitoring and reporting greenhouse gas emissions  
and other information relevant to climate change**

**COM(2016)482**

**adopted at the meeting of 18 October 2016**

1. The Foreign and European Union Affairs Committee of the Senate of the Republic of Poland (FEUAC) believes that the proposal for a regulation determining the obligations of the Member States to reduce emissions in sectors outside the European emissions trading system (non-ETS sectors) does not take into account the key demands submitted by Poland, including, among others, the value of the emission reduction target, the starting point used for the calculation of AEA unit allocation, the starting point location, as well as the use of afforestation and forest management units to account for emissions in the non-ETS sectors.
2. The FEUAC does not support the provision which obliges Poland to reduce its greenhouse gas emissions in the non-ETS sectors by 7% by 2030 against the 2005 level. The FEUAC considers that adopting the average greenhouse gas emissions from the non-ETS sectors for the years 2016-2018 as one of the parameters for fixing the national emission reduction efforts in the years 2021-2030 is highly unfavourable for Poland and other Member States with low GDP per capita.
3. The FEUAC is concerned by the fact that countries with GDP per capita below the EU average have been given the maximum reduction target at a higher level than the average for the EU, which prevents them from keeping up the current development pace and bridging the gap between them and the wealthier EU members.
4. The FEUAC points out that the proposal to use the LULUCF sector units (land use, land use change and forestry) in the non-ETS sectors is too limited in terms of quantity and does not take forest management into account. Given the potential of Polish forests to sequester CO<sub>2</sub>, the FEUAC calls for the forestry sector to also be taken into account as a source of units for balancing emissions in the non-ETS sectors (among others through implementation of forestry projects), in accordance with the Paris Agreement.
5. The FEUAC is convinced that when fixing reduction targets for the Member States it is necessary to take into account their individual reduction capabilities and the associated financial costs as well as economic and social implications.