

EU-ASE Feedback to the 2040 Climate Target Consultation



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Feedback to the 2040 Climate Target Consultation

The European Alliance to Save Energy (EU-ASE) welcomes the opportunity to provide feedback to the European Commission's public consultation on the 2040 climate targets.

We support a binding EU-wide climate target for 2040 to address the more and more frequent impact of the climate, energy and water crisis.

In order to achieve climate neutrality by 2050, the European Union should adopt a comprehensive and ambitious set of climate and energy targets. The synergy between energy efficiency, renewable energy sources and GHG emissions targets is crucial to strengthen EU's climate resilience and accelerate the energy transition.

It is becoming more and more evident that such set of three targets is essential to reduce our dependence on external resources.

In a framework with three targets, energy efficiency is the core element because it is both enabler and a catalyzer to reach climate neutrality targets. In a world with increasingly limited resources the cheapest energy is the one we don't use. When designing the new targets' architecture for 2040 is paramount to prioritise the Energy Efficiency First principle (EE1). By applying the principle, the EU will follow a rational approach where the reduction of energy demand and the optimization of energy consumption accelerate the penetration of renewables in the energy mix and increase the chances of success of innovative clean techs that can further support the phase out of fossil fuels.

Therefore, we recommend that the European Commission fully applies the Energy Efficiency First principle and take into full consideration the beneficial interactions among increased energy efficiency, renewables and GHG targets.

Important to note that in the framework of the ongoing impact assessment for the 2040 climate target, the European Commission must correctly reflect and adequately value the multiple benefits of energy efficiency from a societal perspective. This means considering benefits such as energy security, GDP growth, creation of local jobs, alleviation of energy poverty as well as environmental benefits and reduced health costs. Along the same lines we strongly recommend lowering the discount rate used to model future costs and return on investment of energy efficiency improvements.

In the concluding remarks of this initial set of inputs we would also like to underline that in the public consultation questionnaire there is limited emphasis placed on energy efficiency. Considering the significance of energy efficiency to achieve the European Union's energy and climate objectives and support sustainable economic growth, we would have welcomed a more prominent role for energy efficiency.



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We believe that when the questionnaire refers to the Energy Efficiency First principle as energy technology it narrows down the scope of the principle and does not fully reflect the fact that the Energy Efficiency First principle is a pillar of the European Green Deal.

As explained with the words of the European Commission itself, EE1 is a far-reaching guiding principle that can complement other EU objectives, in particular in sustainability, climate neutrality and green growth areas.

We trust that the European Commission services working on the complex task to review the 2030 GHG emissions target are aware of the far-reaching benefits of energy efficiency and we stand ready to provide further support in the weeks and months to come.