

# EU-ASE RESPONSE TO THE INCEPTION IMPACT ASSESSMENT ON THE 2030 CLIMATE TARGET PLAN



E3G



EUROPEAN ALLIANCE TO  
SAVE ENERGY

*Creating an Energy-Efficient Europe*

## EU-ASE response to the Inception Impact Assessment on the 2030 Climate Target Plan

As European businesses and investors having energy efficiency and energy demand reduction at the heart of our activities, we strongly support President Ursula von der Leyen's commitment to set the EU on a path to becoming the world's first climate neutral continent by 2050 at the latest.

In view of this goal, we believe that the **2030 greenhouse gas emissions reduction target must be increased from the current 40% to at least 55%** because a more ambitious target will put the EU on a more gradual and sustainable pathway to climate neutrality by 2050. An increased 2030 target is also critical because it reflects the absolute urgency, underlined by the IPCC latest Special Report on the impacts of global warming, to address climate change and reduce to minimum GHG emissions in the next ten years.

A growing number of Member States<sup>1</sup> are already committed to increasing their climate ambition. A target of at least 55% by 2030 at the EU level is also **feasible from both technical and economic point of view** and, according to the European Commission's own analysis<sup>2</sup>, it is likely to lead to a net **increase in GDP of 2%**, a surge in **employment** and a **reduction in costs linked to fossil fuel imports and health damages**.

We believe that increasing the 2030 GHG target to at least 55% requires a comprehensive assessment which will consider the impact of such policy decision both in terms of **direct benefits** (e.g. employment, reduced energy costs and import dependency, competitiveness) as well as **avoided costs** (e.g. environmental damages, health costs, fossil fuel subsidies). We are also convinced that such assessment should be based on the analysis of the European energy infrastructure needs and must fully **apply the energy efficiency first principle** to prevent lock-in into carbon-intensive future pathways.

In the assessment, the Commission should assume **that energy efficiency (EE) and renewables (RES) targets are revised upwards**, thus ensuring the three targets (GHG, EE and RES) are mutually supportive. In particular, the Commission should take into account the **full cost-effective potential for energy efficiency**, make the current **target legally binding, and increase it from the current 32.5% at least to a cost-effective 40% by 2030**. In particular, the contribution of **building energy renovation** to the realisation of our 2030 ambition should be considered.

Another key element to achieve the climate neutrality ambition by 2050 is proper **implementation**, accompanied by **rigorous enforcement of the current legislation**. The EU is way off track to achieve the energy efficiency gains needed to meet even the existing target of a 40% cut in greenhouse gas emissions by 2030. As such, infringements procedures shall be systematically considered and triggered for Member States which do not comply with the legal framework of the revised Clean Energy Package, and in particular with the Energy Performance of Building Directive and the Energy Efficiency Directive. For the same reason and based on the final versions of the National Energy and Climate Plans (NECPs), the Commission must communicate about any **existing gap to the 2030 energy efficiency target** and prescribe the necessary additional measures.

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<sup>1</sup> Letter to EVP Timmermans by 12 Member States, <https://www.euractiv.com/wp-content/uploads/sites/2/2020/03/Joint-letter-call-for-plan-to-increase-2030-target.pdf>

<sup>2</sup> [A Clean Planet for all - A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy](#), Nov 2018



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After the urgent response measures to address the unprecedented Covid-19 health crisis, the need to devise social and economic policy packages to reboot the European economy makes the increase of the 2030 target even more relevant. A higher 2030 GHG target will drive investments in key sectors of our economy such as construction and transport and will help us out of the economic crisis creating sustainable growth and jobs. In the long term, it will prevent future health, social, humanitarian, economic and environmental crisis that we will have to face if we do not reduce CO2 emissions and keep global temperature increase below 1.5°C.



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## About Us

The **European Alliance to Save Energy** (EU-ASE) was established in December 2010 by some of Europe's leading multinational companies. The Alliance creates a platform from which our companies (Danfoss, Kingspan, Knauf Insulation, Saint-Gobain, Schneider Electric, Siemens, Signify, and Veolia) can ensure that the voice of energy efficiency is heard across the business and political community.

**EU-ASE members** have operations across the 27 Member States of the European Union, employ over 340.000 people in Europe and have an aggregated annual turnover of €115 billion.

