



6 February, 2020

Dear Sir/Madam

Response to the consultation on a European Climate Law

Change Partnership is a not-for-profit thought-leadership and mission-orientated organisation seeking to solve the politics of climate change to facilitate a clean, secure and prosperous world.

We welcome this opportunity to comment on a proposed European Climate Law which institutionalises achievement of a zero-carbon emission EU by 2050. The climate crisis is central to all and addressing it must be the orientation for all EU actions and activities.

We recommend:

1. **Definition:** 'carbon neutrality' is vague and will lead to a confusing and misleading legislative framework. Therefore, the legal definition of the target should be 'zero-carbon' which refers to all non-negligible quantities of CO₂e from production sources.
2. **2050 targets:** The EU must set two separate targets for 2050. The first relates to the need to remove all direct CO₂e emissions from production processes in the EU before 2050.

The second target should mandate the rules, definition and process for permanent removal of CO₂e emissions from the atmosphere. This avoids offsetting abatement, which increases the climate crisis rather than solves it.

Once the 2050 zero-carbon target is achieved it will be redundant and replaced by the carbon removal target.

3. **Periodic review:** The window to avoid catastrophe is closing fast. Every year the UN produces an *Emissions Gap Report* which gives an indication of the emission reductions required to avoid disaster. This is the best measure of the required emission reductions and must be the yardstick to guide targets and timing set by the EU. These targets must be discussed on the same cycle as the Article 14 'Global Stocktake' timing outlined in the Paris Agreement.
4. **2030 targets:** The EU's climate target must be set by climate science not politics. The *UN EP Emission Gap Report 2019* indicated that all parties of the Paris Agreement must reduce emissions by 7.6% annually. The Commission must propose an emission target around 65% to be within this range.

The 50% reduction target muted by the Commission President is inadequate when

measured against what is required to solve the problem and therefore must not be the basis for discussion or a legislative proposal.

5. **End fossil fuel subsidies:** All direct and indirect fossil fuel appliance and infrastructure subsidies should be removed before the end of this mandate. There is no justification for the Commission and EU to continue to finance fossil fuels. Often these are supported under the guise of social payments to avoid unrest and maintain harmony. Given the indiscriminate nature of climate damages incidents, its costs as well as the reduction of life expectancy directly linked to fossil fuels, these social payments need to be displaced by a programme of mandated upgrades of buildings and industry to accelerate the displacement of fossil fuel use by renewable energies.
6. **Aligning public finance to delivering climate targets:** The EU is central to guiding public finance and catalysing private capital. All public finance should be geared towards rapid deployment of abatement solutions across the economy.
7. **Significance of the energy system:** Whilst considerable effort has been made in decarbonising the energy system, it is still perilously dominated by fossil fuels. Targets for energy system decarbonisation must be increased and made mandatory for 2030 as this sector can and must decarbonise much earlier than others. Much of the decarbonisation effort in other sectors such as transport and industry also requires a removal of fossil fuels from the energy system adding to the need to prioritise legislation in this sector.

We look forward to working with you to design an effective EU Climate Law.

Yours faithfully,

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