

Setting the 2030 GHG emissions reduction target

Impact assessment (SWD(2020) 176, SWD(2020) 178 and SWD(2020) 177 (summary)) accompanying a Commission communication 'Stepping up Europe's 2030 climate ambition. Investing in a climate-neutral future for the benefit of our people' (COM(2020) 562)

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the above-mentioned [communication](#), submitted on 17 September 2020 and referred to the European Parliament's Committee on Environment, Public Health and Food Safety (ENVI). The Commission's communication sets the 55 % greenhouse gas (GHG) emissions reduction target (compared to 1990 levels) by 2030 and is the basis for the [amended climate law](#) proposal. The proposed climate law enshrines the long-term objective for the EU to be climate neutral by 2050 and is the central element of the European Green Deal.¹ The 2030 target is therefore a step towards climate neutrality. The EU objective of climate neutrality by 2050 was set out in the November 2018 Commission communication '[A Clean Planet for All](#)'. In 2019, first the European Parliament² and subsequently the European Council³ endorsed this objective. However, the regulation ([European climate law](#)) proposed by the Commission on 4 March 2020 was not accompanied by an IA due to the existence of the November 2018 [in-depth analysis](#) drawn up in support of the communication on 'A Clean Planet for All'. Therefore, the 2050 climate neutrality objective was not subject to an IA in the sense of the [Better Regulation \(BR\) Guidelines](#). The IA of the 2030 climate ambition, discussed in this note, presents the objective of climate neutrality by 2050 as a political imperative⁴ and takes it as a starting point.

Problem definition

According to the IA, **the problem** is that 'the current level of policy ambition for 2030 is not sufficient to allow for a gradual transition to a climate neutral EU economy by 2050, with both the level of the 2030 climate target and the policy framework being inadequate' (p.8). These assertions are evidenced by Eurostat, European Environment Agency (EEA) sources and the Commission's own calculations. The IA provides an overview of the expected evolution of current policies and the progress achieved, linked to the Paris Agreement (pp. 4-7 and 13-15). As can be deduced from the problem definition above, the **problem drivers** are two-fold (IA, pp. 8-18):

- 1 The current climate target of at least 40 %⁵ reduction is insufficient;*
- 2 The 2030 climate and energy policy framework requires updating.*

The **scale** of the problem is defined as a gap in the current pathway (under current policies), which, according to the IA, would lead to a reduction of around 60 %⁶ below 1990 by 2050 – a significant deviation from the EU objective of climate-neutrality by 2050 (p.9). In addition to recent Eurostat, EEA and Commission data (some of it quantified), the discussion of the problem, its scale and drivers are substantiated by a simplified reflection on the Member States' national energy and climate plans (NECPs). The IA touches upon the behavioural trends⁷ as a result of both the coronavirus pandemic and an increasing environmental consciousness within the EU's civil society, which nonetheless 'are not strong enough by themselves to bring EU climate ambition in line with climate neutrality' (p. 15). It contains a discussion of the potential (mainly economic) implications of the coronavirus crisis, based on recent World Bank, IMF and DG ECFIN data (IA Annex 9.10.1.3, pp. 161-166); however, it does not mention the eventual impacts on the Member States' capacities to meet the current and

future emissions reduction targets. The IA acknowledges that such projections and the evolution of the pandemic remain extremely uncertain (p. 15, Annex, p. 161 and 164).

The IA repeatedly emphasises that the existing policy framework does not drive climate action sufficiently to allow the EU to reach the objective of climate neutrality by 2050, and that there is considerable potential for enhanced and expanded measures under the existing legislation (pp. 10-12). Surprisingly, the IA does not discuss the socio-economic or environmental impacts of the problem identified.

Subsidiarity / proportionality

In addition to the explanation of the legal basis (Articles 11 and 191–193 of the Treaty on the Functioning of the European Union, TFEU), the IA discusses the need for action at EU level and for EU added value, but does not quantify the latter. Although the IA executive summary states that 'the proposed action is proportional to achieve net zero greenhouse gas emissions by 2050', this statement is not substantiated in the body of the document, nor does it discuss proportionality specifically, despite the requirements set by the [BR Guidelines](#). At the time of writing, 10 [national parliamentary assemblies](#) had started scrutinising the Commission communication. The communication links to the European climate law proposal and its amendment, where several [subsidiarity concerns](#) have been raised by national parliaments.

Objectives of the initiative

The two general objectives as outlined in the IA are (p. 17):

- 1 Increase the EU's GHG emissions reduction target to⁸ 50 % to 55 % by 2030 compared to 1990 and determine the scope of the target in order to put the EU on a balanced, credible and realistic track to achieve its objective of climate neutrality by 2050 and provide stakeholders with increased predictability;
- 2 Prepare the ground for the necessary adaptation of the policies playing a key role in the decarbonisation of the EU economy.

To achieve the general objectives, the following specific objectives have been set (IA, pp. 17-18):

- outline how all sectors of the EU economy need to contribute to achieving the increased GHG emissions reduction target, including sectoral abatement of CO₂ and non-CO₂ emissions as well as emissions and absorptions by the Land Use, Land-Use Change and Forestry Regulation (LULUCF) sector;
- prepare the ground for those parts of the climate and energy policy framework, including a potentially extended role of carbon-pricing and emissions-trading, that need to be revised. The specific relevant pieces of climate and energy legislation are: the Emissions Trading System Directive (ETS), the Effort-sharing Regulation (ESR), the Renewable Energy Directive, the Energy Efficiency Directive, the CO₂ Emissions Performance Standards for Cars and Vans and the LULUCF Regulation;
- explore transport-specific policies and the need for their revision in the context of the increased GHG emissions reduction target;
- explore the contribution of non-CO₂ mitigation.

Concerning the revision of the policy framework, the Commission adds that this IA does not discuss precise sectoral ambitions or the required detailed policy tools. These will be addressed in a series of specific, detailed IAs accompanying proposals of legislative acts to be prepared in a coherent and coordinated manner and adopted by the Commission by June 2021 (p. 19). However, the IA does not elaborate on how this coherent and coordinated manner will be ensured. In the Commission's view, the 2030 climate target plan will allow for a societal and political debate on the merit of adopting this increased (50% to 55 % GHG emissions reduction) ambition and thus also inform the subsequent assessment and development of legislative policy proposals (p. 18).

The general objectives correspond to the problem drivers identified in the IA. However, they are already rather specific and not Treaty-based, as required by [Tool #16](#) 'How to set objectives' of the BR Toolbox. Furthermore, the general objectives are not formulated in a neutral way, as they already pre-empt a certain course of action and in fact translate the political commitments of the von der Leyen Commission. The 50–55 % range of the emissions reduction target was already announced in the climate law [roadmap](#) on p. 3 and repeated in the [inception IA](#): 'at least 50 % and towards 55 %' (p.2), '50 % or 55 %' (pp.4–5). The IA does not set operational objectives as required in the BR Guidelines, although specific objectives already appear to contain some elements of operational objectives, such as sectoral abatement and revision of specific pieces of legislation. The monitoring of the progress is based mainly on the provisions of the proposed climate law and the existing regulations (pp. 118-119 of the IA). The objectives are measurable and time-bound, as they contain specific targets to be achieved by a fixed year, and according to the IA they are achievable: 'an ambition increase within the range of 50 % to 55 % GHG reductions is possible, in a responsible manner and deliver sustainable economic growth' (p. 127). Therefore, the objectives seem to be in line with the SMART requirements of the BR Guidelines.

Range of options considered

Besides the baseline (do-nothing option), the IA proposes the following five scenarios (pp. 43-47):

- A **baseline** that captures the relevant long-term dynamics and achieves the existing 2030 GHG, renewable energy sources and energy efficiency EU targets:
 - 1 **Regulatory-based measures scenario** that achieves around 55 % reduction in GHG emissions. It assumes a much higher level of ambition of the energy efficiency, renewables and transport policies, while keeping the EU ETS scope unchanged. This scenario thus does not expand carbon-pricing and relies mostly on other policies;
 - 2 **Carbon-pricing-based scenario** with carbon-pricing as the main driver for 55 % reduction in GHG emissions. It assumes strengthening carbon-pricing, be it via the EU ETS or other carbon-pricing instruments, and further expanding it to the transport and buildings sectors, combined with low intensification of transport policies, while not intensifying the energy efficiency and renewables policies;
 - 3 **A mix of regulatory and carbon-pricing-based scenarios**, which achieves an approximately 55 % reduction in GHG emissions, both expanding carbon-pricing and moderately increasing the ambition of policies, but the latter to a lesser extent than in scenario 1;
 - 4 **A mix of regulatory and carbon-pricing-based scenarios**, which achieves an approximately 50 % reduction in GHG emissions by expanding carbon-pricing and increasing the ambition of energy and transport policies, but to a more limited extent than scenario 3;
 - 5 **The most ambitious scenario, achieving a 55 % reduction in GHG emissions**, based on scenario 3 and on further intensifying fuel mandates for the aviation and maritime sectors in a response to the extended scope of GHG reduction to cover all aviation and navigation.

To complete the assessment, a limited number of variants of the above scenarios were introduced:

- the EU-NECPs variant of the baseline, reflecting in a simplified way and to the extent possible the aggregate ambition expressed in the final NECPs;
- a variant of scenario 3, which looks at a stronger contribution of non-CO₂ emissions to the GHG reduction objective;
- the Covid-baseline and Covid-scenario 3 are two variants that include reduced economic growth assumptions due to the Covid-19 crisis and corresponding reduced activity in various sectors, including transport. The other scenarios do not take the Covid-19 situation into account, and according to the IA, 'at the time when analysis had to be concluded, too large uncertainties remained as to future macro-economic

developments post Covid-19 crisis in order to develop sufficiently robust scenarios for the purpose of the key questions in this Impact Assessment' (p.44). The fact that scenario 3 was assessed by taking Covid-19 into consideration could indicate a certain preference of the Commission for this scenario.

GHG reduction targets below 50 % and over 55 % were discarded and not assessed in the IA. In its resolution of 14 March 2019, the European Parliament supported an economy-wide target of 55 % domestic GHG emissions reduction by 2030 compared with 1990 levels. On 11 September 2020, ENVI Members adopted a [report](#) that strengthens the Commission's proposal by setting the 2030 target to 60 % GHG emissions reduction, which was subsequently adopted in the plenary on 7 October 2020. The Council, in its conclusions of December 2019, did not specify any target. According to the Commission, 'the objective of the IA is to assess an increase of the 2030 GHG target to be achieved in a *responsible*⁹ manner, following the Commission president's guidelines and the European Green Deal, which will require mitigating all negative social and economic impacts associated with the transition. Stepping up [the] ambition to 50 % to 55 % significantly increases the speed of the transition in the short term, while ensuring there is no back-loading of EU action to achieve climate neutrality. A target of over 55 % would front-load the efforts strongly. At the same time, the challenges associated with an even faster transition would increase' (pp.41-42). On the other hand, 'possible scenarios representing 2030 EU GHG emissions reduction target below 50 % were discarded at an early stage as they do not fulfil the political mandate contained in the President's guidelines and the European Green Deal' (p.41).

The scenarios presented in the IA correspond to the general objective 1, although they do not set any in-between target (it is either 50 % or 55 %). Furthermore, four alternative scenarios are laid out for the 55 % reduction target, but only one for the 50 % reduction target. Therefore, the range of scenarios would appear to be skewed towards the 55 % target.¹⁰ Regrettably, when formulating the above scenarios, the Commission did not take into account the cost of non-Europe, despite the requirement set by [Tool#17](#) 'How to identify policy options' of the BR Toolbox, and even though the Commission itself had used the cost of inaction in climate change as an argument during the climate law debate in the European Parliament. **The IA does not state a preferred option**, instead it concludes that 'the Impact Assessment clarifies the understanding of the impacts of various options, and sees particularly benefits in deploying a broad mix of policy instruments, including extending carbon pricing and increased energy and transport regulatory policy ambition, and clearly suggests that no single policy instrument would be capable of achieving all the objectives considered in the assessment alone' (pp. 127-128).

Assessment of impacts

The IA provides an assessment of the environmental, economic, social impacts and energy system impacts of the scenarios (pp. 63-92). Among the notable impacts identified in the IA, a considerable GHG emissions reduction is projected for the energy supply sector (power sector, district heating, energy branch and refineries), residential and services sector compared to the baseline under all scenarios (Table 6, p. 52). The energy mix in 2030 would remain dominated by fossil fuels overall, but renewables increase significantly in all policy scenarios and more so than in the baseline. By 2050, the energy trends observed by 2030 would be greatly amplified (IA, p. 54). Combined air pollution is projected to decrease by 60 % by 2030 compared to 2015 EEA data in the scenarios achieving a 55 % reduction in GHG (p. 62). Imports of fossil fuels are projected to decrease over time and this trend is strengthened with the higher GHG reduction ambition: on average, under the 55 % scenarios, the volume of fossil fuel imports falls by 27 % between 2015 and 2030, with coal down by 71-77 %, natural gas by 13-19 % and oil by 23-25 %, depending on the scenario. According to the IA, fossil fuel imports beyond 2030 shrink dramatically, virtually disappearing for coal, decreasing by 58-67 % for natural gas and by 78-79 % for oil compared to 2015 (p. 72). Based on the macro-economic analyses, the impacts of the 50 % and 55 % GHG emissions reduction targets modestly contribute to EU GDP growth or constitute a limited impediment (the worst case scenario is a loss of GDP of about 0.4 % by 2030 based on the JRC-GEM-E3 model, p. 77). Employment in the coal

sector¹¹ is projected to be around 50 % below the baseline by 2030 in scenarios achieving 55 % GHG reductions (IA, pp. 85-86). The share of energy expenditures (excluding transport) in household income in 2030 is estimated to vary between 7.5 % and 7.9 % for EU-27, depending on the scenario, compared to 7.2 % under baseline (IA, p. 130). The IA acknowledges that the costs of the transition might put an unfair share of the burden on low-income citizens and that the impact on sectors such as mining will be large and disruptive (IA Annex, pp. 203-204). However, the IA does not provide any detail on how these uneven effects of the energy transition will be mitigated, other than discussing several upcoming Commission initiatives, such as the Just Transition Fund. Elsewhere it states that the IAs accompanying future proposals in the context of the 2030 climate target plan will have to particularly address distributional impacts across Member States in light of the 2021-2027 budgetary decisions (IA, p. 92). The key results of the IA analysis for 2030 are aggregated for the EU-27 (IA, Table 28, pp. 129-130) and not broken down by Member State.

The IA has a dedicated section zooming in specifically on the economic impact of the Covid-19 crisis (IA, pp. 80-84). It compares the variant of Covid-scenario 3 to scenario 3, both achieving a 55 % GHG reduction in strongly different economic circumstances. However, by the IA's own admission, 'the core of analysis is performed on scenarios developed without reflecting the crisis' (p. 44), which would mean that the assumptions on which these scenarios are based could potentially be no longer valid.

The IA does not compare the scenarios based on the mandatory criteria of efficiency, effectiveness and coherence, or in regard to their proportionality as required in the BR Guidelines. Instead, it provides a discussion and an overview of key modelling results, expressed in terms of GHG reduction compared to 1990, share of renewable energy sources, primary energy consumption savings, final energy consumption savings, environmental impacts, energy system impacts and economic and social impacts (IA, Table 28, pp. 129-130).

SMEs/ Competitiveness

The IA does not assess the impact on SMEs. On page 78 it states: 'The modelling tools used for macro-economic analysis do not provide direct insights on specific outcomes for SMEs. However, the macro-economic analysis indicates a favourable outlook for such companies: a European economy that becomes more capital and technology intensive and increasingly based on the development of innovative products and solutions. Conversely, no trend was identified that would harm specifically SMEs, considering that they are typically not particularly active in carbon intensive sectors'. However, the IA does not provide information on the share of SMEs or give any further substantiation in this regard. In contrast, the [inception IA](#) does mention SMEs twice: '(the initiative) will look at the need to modernise the EU's industrial base and ensure a favourable environment for SMEs' (p. 2) and 'the initiative will present ... the type of enabling framework required, for instance related to sustainable finance, R&D&I, the deployment of new technologies at scale, the roll-out of a circular economy and the support necessary to accompany SMEs in the transition' (p. 3). None of these aspects were in fact assessed in the IA. Surprisingly still, the [IA executive summary](#) states that 'SMEs are expected to play a key role in the transition, notably as a source of innovations in all economic sectors' (p. 4), although these claims are not substantiated by the IA. The international competitiveness of EU firms under the new targets is discussed as part of the macro-economic impacts, but the results appear inconclusive. Nevertheless, the [IA executive summary](#) states that they are positive (p. 4).

Simplification and other regulatory implications

The Commission communication is intended to update the 2030 climate and energy policy. The IA states that it 'will inform political decisions as regards to the priority areas for the legislative initiatives to be adopted by June 2021, in order to achieve the overall ambition in a coherent manner' (p. 19). However, besides some background information on coherence in Annex 9.10.2 (pp. 168-172), the IA does not elaborate on how overall coherence of legislative initiatives envisaged

for 2021 will be ensured, nor does it provide information on how broad the Commission's inter-service steering group established for preparing this initiative was.

Relations with third countries

Economic interaction with the rest of the world is considered in the macro-economic impact analysis, based on two scenarios: fragmented action (implementation of the existing nationally determined contributions under the Paris Agreement) and global action (mitigation efforts compatible with the achievement of the 1.5° Celsius target). The global context of climate action is set out in the IA Annex 9.10.6 (pp. 192-198), but the impact of a 55 % reduction target on global emissions reduction efforts is not assessed.

Monitoring and evaluation

The IA does not include new monitoring or evaluation provisions or indicators. The overarching framework will be provided by the climate law, which includes measures to keep track of progress and adjust EU actions accordingly (IA, pp. 118-119). Progress will be reviewed every five years, in line with the global stock-taking exercise under the Paris Agreement (Articles 5 to 7). The climate law also includes a process to include the 2030 target based on this IA. In addition to this, a detailed integrated monitoring and reporting framework is provided by the [Regulation](#) on the Governance of the Energy Union and Climate Action. Finally, parts of the climate and energy policy framework envisaged for revision in 2021 also contain the relevant substantive requirements.

Stakeholder consultation

An open public consultation took place between 31 March 2020 and 23 June 2020, meeting the 12-week requirement. A total of 3 915 replies were received. Workshops and ad hoc stakeholder meetings, originally envisaged by the Commission, could not take place due to Covid-19-related safety measures. Therefore, no targeted consultations took place. The results of the open public consultation are reported in the synopsis report accompanying the IA. However, stakeholders' views are not broken down into categories and thus not very detailed. At the request of the Commission's Regulatory Scrutiny Board (RSB), a more disaggregated view of stakeholder opinions across the different categories of respondents¹² was integrated in the IA (Annex, pp. 7-12). Some 77 % of respondents supported a GHG reduction target of at least 55 %, while 69 % of respondents supported a higher than 40 % share of renewable energy and 62 % of respondents were in favour of a higher than 40 % share of energy efficiency.¹³ However, the replies of business associations and companies were more equally distributed across ambition levels compared to other categories of respondents, who favoured higher ambition levels. The largest number of replies to the open public consultation came from Germany (53 %) and France (13 %), which suggests that the replies were not geographically balanced.

In its opinion¹⁴ on European climate law, the European Economic and Social Committee highlighted that the approach of a transition to climate neutrality at EU level overall instead of in every Member State individually has the advantage that an optimal distribution of efforts can be accomplished EU-wide, taking into account relevant differences among Member States. Accordingly, offsets / compensations between Member States should be possible if governed by a solid regulatory framework supplemented with enforcement (p. 10).

Supporting data and analytical methods used

The IA was carried out by the European Commission's services and no external supporting study appears to have been specifically produced to underpin the IA. The analysis relies on a combination of qualitative and quantitative assessments. A quantitative assessment of the scenarios developed in the IA was performed using PRIMES-GAINS-GLOBIOM modelling suites. The role of different policies in achieving the increased climate and energy ambition was assessed in a more qualitative manner. Impacts on GDP, competitiveness and employment were assessed using the JRC-GEM-E3, QUEST and E3ME macro-economic modelling tools, which use the results of the PRIMES energy

model. The modelling tools are explained in Annex 9.3 of the IA and their assumptions are explained at length; however, the limitations seem to be acknowledged only for the JRC-GEM-E3 model used for modelling macro-economic impacts (p. 114 of the IA Annex). Sources of data inputs are listed for all models except E3ME and QUEST, and appear reliable, relevant and for a great part transparently referenced. Third-party copyright models (PRIMES, E3ME, GAINS and GLOBIOM) could not be verified in the interinstitutional Modelling Inventory and Knowledge Management System of the European Commission ([MIDAS](#)) at the time of writing. The IA quantifies total additional energy system investments for the EU-27 compared to the baseline that range from €48.8 billion to €114.2 billion for the 2021-2030 period and from €206 billion to €235 billion for the 2031-2050 period, depending on the scenario (Table 12, p. 71). The benefits are expressed in terms of health, reduced pollution control costs and reduced environmental degradation, and are not quantified. The IA did not carry out a cost-benefit or a cost-effectiveness analysis. A sensitivity analysis was conducted to assess the potential impacts of the current coronavirus crisis for the baseline and for scenario 3 (IA, pp. 83-84), the GHG mitigation implications of five different possible diets, ranging from a light decrease to a more substantial decrease in the consumption of meat and dairy (IA Annex, p. 90) as well as for the effect of different carbon prices on fuel prices both in road transport and buildings in 2030 (IA, pp. 103-104). According to the IA, its concluding section 'allows for a multi-criteria assessment of the options to achieve a more balanced pathway towards climate neutrality by 2050' (p. 127), although the section mainly summarises and discusses the modelling results.

Follow-up to the opinion of the Commission's Regulatory Scrutiny Board

The RSB adopted a negative [opinion](#) on a draft version of the IA report on 22 July 2020, observing that it had significant shortcomings. The RSB found that parts of the analysis were still missing and the results of the consultation were not integrated. Furthermore, the board found that the report was not sufficiently clear about what was to be decided on the basis of this IA and what would be the scope for the follow-up sectoral impact assessments. On 18 August 2020, a revised IA report was submitted to the RSB, to which the board gave a positive opinion with reservations, noting the improvements to the revised report in response to the board's previous opinion. In its second opinion, the RSB stressed that the report was not clear enough on the differences in costs and benefits, and did not explain clearly why it did not identify a preferred option. The IA provides explanations on how it has addressed the recommendations of both RSB opinions (IA Annex 9.1, pp. 3-6). Overall, the IA seems to have incorporated the RSB's recommendations, although a further quantification of estimated costs and benefits could have improved the IA.

Coherence between the Commission's legislative proposal and IA

Although the IA does not identify the preferred option or include new monitoring and evaluation provisions, 55 % GHG emissions reduction compared to 1990 levels by 2030 is the target proposed in Article 2a of the [amended European climate law](#) proposal and the [communication](#) on the 2030 climate ambition.

The IA contains a wealth of information generated by extensive modelling using as many as six analytical models, with modeling assumptions transparently explained. This quantitative analysis is complemented by qualitative assessments. In addition to this, the IA seems to have done a genuine effort to take on board the RSB's recommendations. However, the IA does not discuss the socio-economic or environmental impacts of the problem identified. Furthermore, the objectives of the IA do not seem to be formulated in a neutral way, as they already pre-empt a certain course of action and contain rather specific GHG emissions reduction targets. While the IA examines five scenarios in addition to the baseline, their range appears to be skewed towards the 55 % target and their choice is limited to either 50 % or 55 % with no in-betweens. Although two of the scenarios take into account the coronavirus crisis, the core of the analysis is performed without reflecting its impact, which could mean that the assumptions on which these scenarios are based are potentially no longer valid. The IA does not compare the scenarios based on the mandatory criteria of efficiency, effectiveness and coherence, nor does it compare them in regard to their proportionality as required

in the BR Guidelines. Impacts on SMEs are not assessed and related assertions are not evidenced, while the analysis of impacts on competitiveness is inconclusive. The impacts are largely quantified, but the key modelling results of the IA for 2030 are aggregated for the EU-27 and not broken down by Member State. Although the open public consultation met the 12-week requirement, the largest number of replies came from Germany (53 %) and France (13 %), and the replies are therefore not geographically balanced.

ENDNOTE

- ¹ See also G. Erbach, [European climate law](#), EU Legislation in progress briefing, and L. Jensen, [Climate target plan: Raising the level of ambition for 2030](#), November 2020, EPRS, European Parliament.
- ² [European Parliament resolution](#) of 14 March 2019 on climate change, 2019/2582(RSP).
- ³ [European Council conclusions](#) of 12 December 2019 (EUCO 29/19).
- ⁴ According to the BR Guidelines, there may be cases where it is not possible or appropriate to follow each step in the guidelines; a political imperative to move ahead quickly is one such case (BR Guidelines, p. 3).
- ⁵ The current target excludes carbon sinks, whereas all scenarios in this IA present the results including the full EU carbon sink to establish whether the EU has achieved a GHG reduction of 50 % or 55 %.
- ⁶ Net-zero GHG emissions by 2050 is understood as a 100 % GHG reduction compared to 1990 levels, including the removals by carbon sinks.
- ⁷ Reduced meat consumption, train travel to substitute for short-haul flights, increased videoconferencing for business meetings and teleworking.
- ⁸ This is the exact formulation as found in the IA on p. 17.
- ⁹ The Commission's understanding of 'responsible' is found on page 18 of the IA, further arguments in favour of discarding the targets below 50 % and above 55 % are found on pages 41-42 of the IA.
- ¹⁰ This is the target chosen in the amended European climate law proposal ([COM\(2020\) 563](#)).
- ¹¹ Besides the coal sector, the IA also contains employment projections by 2030 for the following sectors: crude oil, oil, gas, electricity supply, ferrous metals, non-ferrous metals, chemical products, paper products, non-metallic minerals, other equipment goods, consumer goods, construction, transport (air, land, water), market services.
- ¹² An individual in a personal capacity; in a professional capacity or on behalf of an organisation: academic/research institution, business association, company/business organisation, consumer organisation, environmental organisation, non-governmental organisation (NGO), trade union, other, public authority.
- ¹³ The respondents to the questionnaire could choose among the following targets: 40 %, 50 % and 55 % for climate; 32 %, 35 %, 40 % and above 40 % for renewable energy; and 32.5 %, 35 %, 40 % and above 40 % for energy efficiency (no in-between targets and no targets above 55 % for climate were included).
- ¹⁴ [European Economic and Social Committee Opinion](#), European climate law, July 2020.

This briefing, prepared for the ENVI committee, analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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