



The EU's 2030 target and 'technology neutrality' – getting it right

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The EU's 2030 target

The European Commission has proposed that the EU adopt a 2030 emissions reduction target of 55%, but this is far below the level needed to keep global temperature rise to 1.5°C. The UN emissions gap report 2019 suggests the EU should be aiming to cut emissions by at least 68%¹ - and that's without even taking into account the EU's responsibility for historical emissions. The Commission has also proposed that the 2030 target be a net emissions reduction target, meaning that it would include removals by sinks. Such a move would be very damaging and must be rejected, for the following reasons:

- It would render the 55% target even more inadequate than it is already. Based on the Commission's impact assessment, including removals from the land use sector would mean the real cut in emissions would only be somewhere between 50.5% and 52.8%, depending on the size of the sink². It is therefore not correct to claim that the Commission proposal represents an increase from the current 40% level to 55%.
- Science is clear, moving carbon from the atmosphere back to the land through reforestation and restoration of degraded ecosystems can reduce atmospheric carbon, but cannot offset fossil fuel emissions. This is because carbon in the atmosphere and carbon in land systems are both part of the "active" land-atmosphere-ocean carbon cycle – increasing the carbon in land systems parks that carbon in an unstable part of this active system, with no guarantee for it to remain there permanently. Carbon in the ground stored as fossil fuels on the other hand are permanently locked away, and burning them adds carbon to the active carbon cycle in aggregate. Once added, this new additional carbon cannot be removed from the carbon cycle in time-scales relevant to climate change. Continuing to burn fossil fuels while assuming that these emissions are being offset by increasing land carbon will inevitably lead to increased heating over the century.
- It adds considerable uncertainty. Emissions outside the land use sector (mostly from fossil fuels) are generally easily quantifiable, and their reduction irreversible. In contrast, accounting for emissions and removals in the land use sector is far less precise and can be subject to major changes that are not predictable, for example those resulting from forest fires, pests, disease or other climate-related changes. Relying on removals in the land use sector is therefore risky, and could lead to other sectors having to make up ground at short notice.

For these reasons, it is crucial that EU leaders reject the proposal for a net target, support an emissions-only target, and call for increases in carbon sinks to be pursued separately and additionally, for example through targets for the restoration of forests and other natural ecosystems.

¹ See infographic here: <https://twitter.com/WWFEU/status/1298936845292785666>

² The Commission estimates that the overall net sink in the Land Use, Land Use Change and Forestry (LULUCF) sector could by 2030 decline to 225 MtCO₂ or increase to 340 MtCO₂ (see page 61 of the Staff Working Document accompanying the Commission proposal: https://eur-lex.europa.eu/resource.html?uri=cellar:749e04bb-f8c5-11ea-991b-01aa75ed71a1.0001.02/DOC_1&format=PDF)



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Technology neutrality

The Treaty does not require or support making the decarbonisation of the EU's energy system subject to the principle of technology neutrality. To the contrary, while establishing a clear link between energy and environmental policy (with the aim of not simply protecting but also of improving the environment) Article 194(1) TFEU is clear that the Union's energy policy should aim at promoting "energy efficiency and energy saving and the development of new and renewable forms of energy", as well as the interconnection of energy networks.

Claims that the EU's energy policy should promote technology neutrality (code for fossil gas and nuclear) are therefore legally baseless. Any choice towards granting regulatory or financial support to those two technologies under EU law should be considered out of the scope of the Union's energy policy and unjustified. This is particularly important given that those technologies risk exacerbating the climate emergency rather than helping tackle it. Lifecycle emissions from fossil gas use can in some cases exceed those of coal, and construction of new nuclear plant is a carbon intensive activity that will increase emissions for a decade or more before providing any potential benefit - precisely the time period over which we need to make drastic cuts to keep the 1.5°C goal within reach.

Neither can energy security be used as any form of justification for ongoing EU support. Current gas import and transmission capacity is already more than adequate³ and further investment in gas infrastructure will simply lead to additional stranded assets. EU funding and regulatory support should instead be targeted at cleaner and more cost effective options such as energy efficiency, demand side response, wind and solar power and all forms of storage.

Nuclear is much more expensive than renewable energy and takes much longer to build. The Hinkley Point power station in the UK is already 18 months behind schedule, with two to three billion euros overspend. Olkiluoto's power station in Finland is 12 years behind schedule and tripled in estimated cost. The Flamanville nuclear power station, in France, is now at least 11 years late and its cost is estimated at 19 billion euros. According to the Court of Auditors, the cost of the electricity produced by the Flamanville EPR could be between 110 and 120 €/MWh, whereas levelised [costs](#) for wind are between 21 and 71 €/MWh and the levelised costs for utility scale solar are 24 and 35 €/MWh.

Nuclear energy also produces waste for which there are no foreseeable solutions – attempts to explore long-term and large-scale solutions in countries like Finland, Sweden, France and Belgium still face substantial technical, social and economic hurdles. It exposes people and environment to the risk of serious accidents with substantial emissions of radioactive substances, while the likelihood of such accidents happening may be relatively small, they would affect the whole continent.

Finally, the existence of the Euratom treaty, as recognised by the Court of Justice, simply means that a Member State may continue to fund and use nuclear energy. However, as the court recognised, this is a matter for national policies without prejudice to the EU's environmental rules and principles and cannot be construed as a reason for the EU to limit or abandon the preference for renewables, savings and efficiency included in the Treaty.