

April 2017

## ZEP Recommendations for the Governance of the Energy Union

The European Zero Emission Technology and Innovation Platform (ZEP) welcomes the proposal from the European Commission in November 2016 to establish a Regulation on the Governance of the Energy Union (2016/0375 (COD)).

ZEP believes the Regulation could deliver significant EU added value in achieving EU energy and climate goals, including towards meeting the objectives of the Paris Agreement.

As the European Parliament and European Council consider the proposed Regulation (2016/0375 (COD)), ZEP makes the following recommendations:

### Article 4: National objectives, targets and contributions for each of the five dimensions of the Energy Union

ZEP welcomes the introduction of a single, streamlined governance process, which takes account of all 5 dimensions of the Energy Union. This broader focus for EU energy and climate governance could help deliver a more joined-up approach to tackling climate change at the EU level, and ensure that the costs to society are minimised.

**With respect to Article 4(a), sub-paragraph 1, ZEP recommends that the 2009 European Council conclusions establishing a Union objective for an 80 – 95% greenhouse gas emissions reduction target are referenced.**

In addition, **ZEP strongly supports the inclusion of national 2050 objectives for the deployment of low carbon technologies within Article 4(e), sub-paragraph 2.** This will be essential to ensuring that progress is delivered on technologies necessary for achieving medium- to long-term emissions reduction objectives.

### Article 6: Member States' contribution setting process in the area of energy efficiency

ZEP supports the flexibility for Member States to take into account circumstances affecting primary and final energy consumption in meeting energy efficiency objectives.

In its Fifth Assessment report, the Intergovernmental Panel on Climate Change (IPCC) recognised the importance of technologies such as Carbon Capture and Storage (CCS) to achieving global climate change objectives, despite the fact that an 'energy penalty' can often be associated with the CO<sub>2</sub> capture process. For the EU, it will be important to recognise that although CCS may slightly impact on energy efficiency objectives, these technologies could make a significant contribution to reducing CO<sub>2</sub> emissions at least cost to society.

### Article 13: Update of the integrated national energy and climate plan

ZEP agrees with the European Commission that a provision to enable updates to integrated national climate and energy plans during the ten year period that they cover will be essential to ensure that the plans remain up-to-date and in line with scientific progress and longer-term (e.g. 2050) goals. This provision should be maintained by the Parliament.

### Article 22: Integrated reporting on research, innovation and competitiveness

ZEP strongly supports the inclusion of the fifth dimension of the Energy Union (Research, Innovation and Competitiveness) in the overall Governance package. In particular, **references to the SET Plan objectives and policies should be retained in order to provide a link between the overall governance framework and the specific targets for different technologies adopted by SET Plan countries.**

In addition, ZEP welcomes the requirement, if applicable, for national climate and energy plans to include information on carbon transport, use, and storage infrastructure. ZEP's analysis has shown that the value of CCS to the EU could be in excess of €1 trillion by 2050 alone<sup>1</sup>, and that specific policies are needed to enable the development of CCS infrastructure<sup>2</sup>.

### Article 25: Aggregate Assessment of national plans and Union target achievement – Commission monitoring

The proposed Article 25 outlines how the Commission will assess progress towards achieving Union level targets and objectives.

Whilst the Article provides a sound basis for considering progress towards achieving the greenhouse gas emission reduction target and targets for renewables and energy efficiency, ZEP believes **the Article could be improved by also including an assessment on the requirement for, and progress of implementation, of technologies and infrastructure capable of delivering negative emissions.**

Scientists have demonstrated that most computer simulations used to model emissions reductions, and show how the Paris Agreement can be achieved, rely on negative emission technologies (NETs) such as Bio-CCS<sup>3</sup>. Despite this, the proposed governance Regulation makes no provision to monitor the extent to which NETs will be needed in the EU or progress towards implementing the necessary technologies and infrastructure.

**ZEP believes that a new paragraph should be introduced into Article 25 to enable the Commission to more actively monitor progress regarding negative emissions.**

---

<sup>1</sup> <https://zeroemissionsplatform.eu/component/downloads/downloads/1628.html>

<sup>2</sup> <https://www.thecrownestate.co.uk/media/389780/ei-business-models-for-commercial-co2-transport-and-storage-zep.pdf>

<sup>3</sup> <http://science.sciencemag.org/content/354/6309/182.full>