

# INF RSE-EUROPE

International Network for Sustainable Energy

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## **INFORSE-Europe Comments on the Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Governance of the Energy Union (COM(2016)759)**

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It is important that the Energy Union ensures that EU-targets are met, including the targets on renewable energy, on energy efficiency, and on reduction of greenhouse gases. Countries that are not on track to reach these targets shall also have additional requirements to reach the targets.

The requirement of diversification of national energy mix shall only be fulfilled with energy efficiency and renewable energy, not by increased or changed use of fossil fuels, which can increase the overall EU dependency of imported fossil fuels. It shall also be noted that increased use of imported biomass is not contributing to increase security of energy supply, and that such imports will often lead to larger greenhouse gas emissions than other forms of renewable energy.

We urge that the proposed integrated energy-and climate plans are updated every 5 years to be in line with the 5-year cycles of the NDCs for the Paris Agreement. This shall be changed in art.3, art.13, and art.14.

Long-term plans shall have targets of minimum 95% reduction of greenhouse gases by 2050, to be in line with the Paris Agreement targets of greenhouse gas neutrality in the second half of the 21st century and to limit global warming to 1.5 – 2°C. The current proposal of a long-term target of 80-95% greenhouse gas reductions by 2050 is insufficient and should be changed in art.14.1c.

Long-term plans shall be updated every 5 years to be in line with the NDC and low-emission scenario cycles of the Paris Agreement. Progress shall be evaluated also in 2025 to be in line with this. Both of this shall be included in art.25.

For further comments, please contact INFORSE-Europe, att. Gunnar Boye Olesen (INFORSE-Europe Coordinator)