



Health and Environment Alliance (HEAL) response to the EU consultation on the 2030 climate and energy framework

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Founded in 2003, the Health and Environment Alliance (HEAL) is a leading European not-for-profit organisation addressing how the environment affects health in the European Union.

HEAL has over 65 member organizations, representing health professionals, not-for-profit health insurers, patients, citizens, women, youth and environmental experts. Members include international and Europe-wide organizations, as well as national and local groups. HEAL brings independent expertise and evidence from the health community to different decision-making processes. [Members](#) include international and Europe-wide organizations as well as national and local groups in 26 countries.

The organization's vision is a healthy planet for healthier people in Europe and beyond. HEAL's advocacy and awareness-raising work aims to show how environmental action can bring down rates of asthma, obesity, diabetes, cancer and infertility.

Introductory comments

As many studies, assessments and also increasingly experience shows, climate change is a major threat to not only human health, but also to the environment, our societies and the economy as a whole. The World Health Organisation calls climate change the biggest public health threat of the 21st century, and there is clearly an urgency to act to mitigate climate change at the national, EU and international level (and to adapt to it).

According to the EEA, climate change already contributes to the burden of disease in Europe, and the toll is expected to rise, with threats from extreme weather events, changes in vector-borne disease, prolonged allergy seasons with new allergens, worsening of air pollution etc.

The good news is that there are many win-win measures not only for the climate but also for health. The current EU targets have been indispensable to show EU leadership at a global scale; but the current EU framework is not ambitious enough. Therefore, the EU and many national governments have let important opportunities for climate and health go by, and are too slow in making the move to a sustainable, low-carbon society.

The ambition level for 2030 should reflect the urgency of the climate crisis and give clear priority to the structural changes needed which will benefit health (and save money). The EU needs to step up and significantly reduce its emissions in the next years.



Answers to selected Questions

Which lessons from the 2020 framework and the present state of the EU energy system are most important when designing policies for 2030?

The current framework has been an important starting point for better health protection, and has especially helped to increase the share of renewables in Europe.

However, an important lesson learned was the lack of coherence between the current 3 targets, as energy savings impacts were not factored in. The large potential that energy savings have for climate mitigation but also for health protection (e.g. creating climate and health-friendly buildings) was not successfully tapped into. This would have been different with a binding energy savings target.

Secondly, the 20% GHG emission reductions target was and is too low to respond to the climate crisis, but also to fully reap the health benefits.

As a [2010 report from HEAL/HCWH](#) demonstrates, by upping the EU emissions reductions target from 20 to a full 30% domestic target, an additional 30,5 billion EUR in health savings could be reaped by 2020. The earlier the action starts, the higher the benefits are. These health savings can offset significant parts of the investment costs into low-carbon technology.

Thirdly, the EU should not make the ambition of its climate and energy policy conditional to international developments. This approach negates the leadership role that the EU has and needs to have at the global level, and the boost it can give to international health and environmental protection by being a frontrunner on climate.

Overall, we regret that health considerations were not adequately considered in the climate and energy discussions in the last years. This leads to one-sided discussions about the costs of mitigation measures, where in most cases the external health costs that come with our current fossil-fuel dependent economy and way of living are not considered, and consequently the massive benefits and costs savings to health which we can reap from a low-carbon economy are overlooked.

Which targets for 2030 would be most effective in driving the objectives of climate and energy policy? At what level should they apply (EU, Member States, or sectoral), and to what extent should they be legally binding?

We agree with other NGOs that the EU needs to adopt a set of ambitious, coherent and binding EU-wide and national targets for emissions reductions, energy savings, renewable energy production and international climate support.

The ambition for 2020 also still needs to be increased.



Are changes necessary to other policy instruments and how they interact with one another, including between the EU and national levels?

Direct and indirect fossil fuel subsidies must be phased out at EU and national level, including funding of the European Investment Bank, e.g. for coal power plants.

Coal power plants are not only a major contributor to Europe's CO₂ emissions, they also emit thousands of tons of hazardous air pollutants each year, which worsen the air pollution problem in Europe. The health bill of coal power plants [reaches 43 billion EUR](#) a year for the EU as a whole.

The phase out of coal power by 2040 in Europe is possible. EU member states should now introduce a moratorium on the construction of new coal plants and develop a national phase out plan.

How can the EU best exploit the development of indigenous conventional and unconventional energy sources within the EU to contribute to reduced energy prices and import dependency?

The European Union still only marginally taps into the potential of the most climate and health-friendly energy sources, which are energy savings and renewable energy.

HEAL rejects any attempts to promote shale gas as a silver bullet to Europe's future energy supply. Shale gas has major health and environmental risks, and is not a sustainable energy option. For further information see: Shale gas. Unconventional and unwanted: http://www.env-health.org/IMG/pdf/shale_gas_unconventional_and_unwanted_the_case_against_shale_gas_updated.pdf

NGO joint position statement on fracking:

http://www.foeeurope.org/sites/default/files/press_releases/foee_shale_gas_joint_position_240412.pdf

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