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THE EUROPEAN UNION**

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**NOTE**

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**From:** General Secretariat of the Council  
**To:** Council

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**Subject:** Communication from the Commission on "A policy framework for climate and  
energy in the period from 2020 to 2030"  
- Policy debate  
= Delegations' replies

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Delegations will find in the Annex the replies received from SK to the Presidency questions, contained in document 6422/14, for the policy debate on the abovementioned proposal in the Council (Environment) on 3 March 2014.

SLOVAKIA

1. *Do you consider that the overall approach of the 2030 framework for climate and energy policies provides the appropriate balance between ambition, in terms of reducing greenhouse gas emissions in line with the long-term climate objective, and flexibility for Member States to define the most appropriate ways to transition to a low-carbon economy taking into account their preferences, specific circumstances and capacities?*

- Slovakia welcomes the new 2030 framework with important political, economic and environmental implications. It as a challenge and opportunity to set motivating conditions for the modernization and transformation of energy sector, the stability and predictability of long-term low carbon investments to reduce greenhouse gas emissions and development and deployment of these technologies.
- We appreciate the fact that the proposal was based on a detailed analysis taking into account state of implementation of adopted 20/20/20 framework and also wider international context. In spite of the approach chosen, the 2030 framework at this stage is still not sufficiently balanced. It is the result of top-down approach and similarly as in 20/20/20 framework, mostly target oriented.
- For a mid-term development of the EU the key is not to have ambitious targets but rather incentivise technological innovation, promote modernisation and transformation of energy sector, and increase competitiveness of existing industries on the global markets whilst creating new high-tech and climate resilient industries at the same time . This is the area we should concentrate the most before we agree on any targets.
- The Slovak position is to require economic and technological viability of the proposed measures by seeking synergies of policies, including industrial policy. It is necessary to take into account and minimize negative impacts on the competitiveness of traditional industry and ensure affordable energy prices.

- The proposal contains discrepancies between flexibility of the MS objectives on the one hand, and strengthening the governance from the EU level on the other hand. We can support the effort to simplify reporting and monitoring of energy and climate policy from the side of the European Commission and we understand the need for mutual information on national decisions. However, the proposed " iterative " process of assessment we consider as a disproportionate interference with national competences. Current forms of coordination of national policies, such as European Semester, regional cooperation, we deem as sufficient.
- We would appreciate to have in proposals well-defined principles and conditions taking into account special circumstances of each country. These additions would ensure better coherence and long-term stability of proposed framework.
- In respect to proposed targets, Slovakia supports the establishment of a single GHG target by 2030. We oppose setting targets for renewable energy at both EU and national level as well as for energy efficiency. Target for greenhouse gas emissions provides sufficient incentive for the development of renewable energy sources in accordance with local conditions. From practical point of view, the proposal to have binding target for renewable energy sources on the EU level which will be fulfilled via indicative Member State targets raises more questions than provides a stability and predictability.
- As regards the ambition of GHG target, -40 % seems to be very ambitious and disproportionately costly for less developed MSs. Slovakia has substantially and for a long time changed its emission profile, that means we already used up our reduction potential for an extensive emission reduction.
- Our final decision on GHG target will depend on the approved criteria and principles for determining individual Member States contribution to the overall objective of reducing emissions, so called burden sharing. The final reduction target for the SR must be determined in a manner which will adequately reflect national circumstances, the principle of "ability to pay" and the reduction efforts already made.
- Slovak Republic agrees that after approval of a common methodology also the sector of land use, land-use change and forestry (LULUCF) shall be a part of the 2030 framework
- We consider EU ETS to be one of the most important tools in a transition to a competitive low carbon economy. We are therefore ready to discuss the options proposed to strengthen investment incentives through setting a carbon price.

2. *What do you see as the next steps in the discussion on climate and energy policies until 2030, taking into account the need to provide certainty for investors in the longer term and prepare for the international climate negotiations, and which aspects of the proposed framework would as a priority need to be further discussed and defined, for example in relation to efforts at EU and Member State level and in different sectors?*

- Slovakia welcomes EU domestic target without any conditionality connected to international development. 2030 framework, is an integral part of our ambitions and contributions into UNFCCC negotiations towards a new global agreement.
- In this context we ask for individual impact assessments on MSs level taking into account their national circumstances, potential and flexibility
- It is important to agree upon a set of objective criteria for burden sharing of a joint fulfilment. In our view the guiding principles for sharing efforts are fairness, ability to pay and solidarity and efforts already made.
- Similarly we should analyse in detail the proposed governance structure which seems to be problematic due to the subsidiarity principles and possible control of national energy mix by the Commission
- To contribute to a substantial progress in 2014 and 2015 on the international level, we think it is important to agree on principles and criteria for burden sharing and conditions for fulfilment at first and then agree upon target.
- We need to have an in-depth discussion also in various Council formations. March European Council should focus on a first, broader policy debate without any decisions on final quantitative targets.