Dear President Barroso,

I wish to express my serious concerns that the process for determining the EU’s 2030 decarbonisation target is being conducted in a vacuum of scientific evidence, and that the proposed target fails to quantify honestly the EU’s high-level statements and international obligations on climate change.

The Green Paper “A 2030 framework for climate and energy policies”¹ asserts that “emissions would need to be reduced by 40% in the EU to be … consistent with the internationally agreed target to limit atmospheric warming to below 2°C”. Whilst the 40% target hides a suite of inappropriate assumptions², my strongest reservations refer to [1] the abuse of probabilities of 2°C; and [2] the highly inequitable distribution of the 2°C emission budget between non-Annex 1 and Annex 1 nations.

[1] The abuse of probabilities
From the Copenhagen Accord³ through to the Camp David Declaration⁴, signatories commit to holding “the increase in global temperature below 2°C” and to taking action “to meet this objective consistent with science and on the basis of equity”. Echoing this, as Commission President you reaffirmed that the EU had “set in stone a commitment to cap the temperature increase at 2 degrees Celsius” and that in translating this into policy the EU would “respect climate science⁵”. Moreover, as the Commission’s proposal to COP19 made clear, “if we fail to achieve [the 2 degree] objective” we will “face devastating impacts”⁶.

According to the IPCC’s taxonomy of probabilities⁷, both the language of international agreements and your statements as Commission President relate to a high probability of not exceeding 2°C: quantitatively between 1 and 10%. In stark contrast, the analysis informing much of the debate on the EU 2030 targets is premised on a 50% to 70% chance of exceeding 2°C. This misrepresentation of probabilities has dramatic consequences for the necessary scale of mitigation. For example, a 60% chance of exceeding 2°C has a carbon budget twice as large as that for a 10% chance.

[2] Inequitable apportionment of the remaining 2°C carbon budget
Only by relying on the absurd supposition that non-Annex 1 nations will peak their emissions before 2020 – apparent in the Stern Review and most contemporary 2°C emission scenarios – can mitigation rates for Annex 1 nations be maintained at politically expedient levels (typically 3-4% p.a.).
If, instead, non-Annex 1 emissions were to peak by 2025 and rapidly reduce thereafter (still extremely challenging assumptions), then the EU would need to make immediate emissions reductions of approximately 10% p.a., arriving at a 2030 decarbonisation target of around 80%. The mathematics of safeguarding any reasonable probability of 2°C is inescapable, yet such levels of mitigation are far beyond anything countenanced by those engaged in debates on the EU 2030 targets.

Global emissions today are 60% higher than at the time of the first IPCC report in 1990, and in the six years since the last IPCC report (AR4) a further 200 billion tonnes of CO₂ have been released into the atmosphere. As a result, in 2013 the scale of mitigation required is now an order of magnitude more challenging than it was in 1990. The EU must acknowledge this reality if it is ever to catalyse meaningful action on climate change. This demands the courage to pursue an equitable and science-based 2030 decarbonisation target of around 80%. Anything less and the EU will renge on its 2°C commitments and, as the Commission rightly notes, bequeath to future generations a legacy of “devastating impacts”.

Yours sincerely,

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3 Report of the Conference of the Parties; fifteenth session; Copenhagen, 7 to 19 December 2009. Part Two: Action taken by the Conference of the Parties FCCC/CP/2009/11/Add.1 30 March 2010
4 Camp David Declaration: Camp David, Maryland, United States; May 18-19, 2012
6 Submission by Lithuania and the European Commission of behalf of the European Union and its member states. Vilnius, 16 September 2013 Subject: The scope, design and structure of the 2015 agreement.
7 Guidance Note for Lead Authors of the IPCC Fifth Assessment Report on Consistent Treatment of Uncertainties. IPCC Cross-Working Group Meeting on Consistent Treatment of Uncertainties. Jasper Ridge, CA, USA. 6-7 July 2010