

European Commission

26. November 2020

The Danish Chamber of Commerce's response to roadmap for national emissions reduction targets (Effort Sharing Regulation)

The Danish Chamber of Commerce thanks the Commission for the opportunity of responding to the roadmap regarding national emissions reduction targets and effort sharing regulation (ESR). We strongly support EU climate ambitions and complementary policies and want to emphasize the importance of high ambitions and shared goals throughout all the EU.

The Danish Chamber of Commerce supports option 1 the EU presents in its proposal to phase out the ERS and extending emissions trading to include additional sectors, which are currently being accounted for in ESR. This is cheaper for EU as an entirety and more effective.

The Danish Chamber of Commerce suggest that the impact assessment also captures technological development and the impact this might have on difference reduction potential and costs. Furthermore, we suggest that the CION analysis the added overall cost at the EU level by choosing country specific targets and sectoral policies as the main policy instruments for climate change mitigation policies in the NON-ETS sectors.

Kind regards,

Ulrich Bang

Head of Climate and Energy