

Stockholm Region Association for European Affairs position on the European Union's climate targets for 2040.

December 2023

Stockholm Region EU Office hereby presents the position of Stockholm Region Association for European Affairs on the European Union's climate targets for 2040, adopted by the Executive Committee of Stockholm Region Association for European Affairs in December 2023.

In light of and taking into account the following, the Stockholm Region Association for European Affairs presents a contribution to the urgent work to secure the EU climate targets for 2040:

- the first global stocktake under the Paris Agreement concluded at the UN Climate Change Conference 2023: COP28,
- the European Union's regulation ((EU) 2021/1119) of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') setting out the targets of 55% reduction of emissions by 2030 and EU's goal of achieving climate neutrality by 2050,
- the upcoming presentation regarding the EU climate target 2040 by the European Commission set to be outlined by the first quarter of 2024.

The Stockholm Region Association for European Affairs

Stockholm Region Association for European Affairs consists of three main members: the City of Stockholm, Region Stockholm and Storsthlm. Other members in the association are Region Uppsala, Region Västmanland, Region Sörmland, Region Gotland, and Mälardalsrådet – the Council of the Stockholm-Mälar Region. The aim of the association is to promote the members' common political interests through collaboration on issues connected to the region's relationship with the EU. Together the members own the [Stockholm Region EU Office](#), which is their joint representative office in Brussels.

The overall perspective

To ensure that the EU successfully manages a far-reaching green, digital, and societal transition, closer cooperation between European, national, regional, and local levels is necessary going forward. Municipalities and regions are responsible for a crucial part of the efforts towards climate change mitigation and other societal goals. Across Europe, cities have set ambitious targets to reduce greenhouse gas emissions, not least within the framework of the mission 100 climate neutral and smart cities by 2030, which also includes the City of Stockholm. Region Stockholm and other regions and stakeholders in the association have similarly ambitious plans for their active transition work. The Stockholm Region European Association encourages the EU to support efforts such as Stockholm Region's local goals.

Stockholm Region Association for European Affairs position on EU climate targets for 2040 summarized in 7 main points:

1.	The Stockholm Region Association for European Affairs welcomes the establishment of a legally binding climate target for 2040 that clearly sets out the way forward in order not to lose momentum in the transition, and to ensure that the EU becomes climate neutral by 2050. The Stockholm Region Association for European Affairs is a strong advocate of an ambitious target for 2040 that is in line with the science-based recommendations of the EU Advisory Committee on Climate Change.
2.	The Stockholm Region Association for European Affairs stresses that municipalities and regions are responsible for a crucial part of the efforts that need to be made to reduce emissions . To ensure that the EU successfully manages a far-reaching green, digital, and societal transition, closer cooperation between the European, national, regional, and local level is needed .
3.	The Stockholm Region Association for European Affairs believes that a justice and gender equality perspective should permeate climate policy , as it is often the most vulnerable households that have the greatest obstacles to accessing, for example, climate-smart housing and transport.
4.	The Stockholm Region Association for European Affairs believes that an increased focus on reducing scope 3 emissions¹ is required to achieve climate neutrality , calls for the European Commission to set transparent and consistent targets for reducing scope 3 emissions in the EU and for the European Commission to provide Member States with a calculation method that can be applied at local and regional level.
5.	The Stockholm Region Association for European Affairs stresses that emission reductions should be the highest priority , but that natural carbon sinks and technologies for the collection, storage and use of carbon dioxide are also required to achieve the goal of climate neutrality.
6.	The Stockholm Region Association for European Affairs believes that climate adaptation, crisis preparedness and defence activities - three major societal challenges - need to be handled in a holistic perspective so that synergies between them can be made visible and utilized. With such a broader approach, the climate issue does not risk being downgraded when other crises need to be managed.
7.	The Stockholm Region Association for European Affairs believes that a dialog needs to be conducted on how the climate transition should be financed between the different levels of responsibility. Clarity is also needed from the European Commission on how the various EU funds can be used to achieve the climate target by 2040 and climate neutrality by 2050.

¹ Scope 3 emissions are other indirect emissions, from purchased materials, use of purchased products, waste management, business travel, etc. ([The Swedish Environmental Protection Agency](#)).

An ambitious target is necessary to avoid losing momentum in the transition to climate neutrality.

Agreeing on a 2040 target as soon as possible is essential to link it to the update of the EU's long-term budget and the development of the Green Deal Industrial Plan. This is important to provide predictability to investors and businesses to support them in leading the green transition, thus increasing the EU's competitiveness while reducing emissions. Delaying further action and thus not achieving climate neutrality by mid-century would have too negative an impact on European municipalities and regions and their citizens. The targets and measures also send a signal to the rest of the world that the EU is taking the climate crisis seriously, even at a time when other crises are taking centre stage.

The European Scientific Advisory Board on Climate Change presented its science-based report in June 2023². The report states that the EU needs to aim for net emission reductions of 90-95% by 2040 compared to 1990 levels in order to limit global warming to 1.5°C (with no, or only limited and temporary, overrun of that temperature). Keeping the global temperature increase well below 2°C and aiming to limit it to 1.5°C is enshrined in the Paris Agreement.

Multi-level cooperation is key to successfully managing the transition.

Municipalities and regions are responsible for a crucial part of the efforts to reduce climate impact and other societal goals. They can contribute in several ways through their activities, urban planning, public procurement, development cooperation and dialogue with businesses and citizens. Many have ambitious goals and initiatives in this area based on their own conditions. According to the Climate Roadmap for the region³, Stockholm County will achieve net-zero emissions by 2045, and last year the City of Stockholm set a new goal for the city to become climate-positive by 2030. Other municipalities and regions in our association have similarly expressed goals for their climate transition. Around Europe, cities have set ambitious targets to reduce greenhouse gas emissions, not least within the framework of the mission 100 climate-neutral and smart cities by 2030, which also includes the City of Stockholm. We now encourage the EU to support efforts such as Stockholm Region's local goals.

Existing 'improved regulative' tools do not provide a solid enough basis to include local level perspectives, and therefore do not ensure that proposed policies will have full impact. To ensure that the EU successfully manages a far-reaching green, digital, and societal transition, closer cooperation between European, national, regional, and local levels will be necessary going forward.

A justice and gender perspective to make the transition socially sustainable.

The long-term goal of implementing the green transition is to create better living conditions and new opportunities. The impact of the climate transition affects different groups differently. The proposed and implemented solution need to be designed from a fairness and gender equality perspective to achieve this goal. Not everyone will be able to afford climate-smart solutions such as heat pumps, solar panels, and electric cars, which currently often cost more than fossil-based alternatives. Furthermore, there is also the issue of energy efficiency in housing, where there are concerns that costs will be passed on to the tenants. For example, with the EU's updated legislation on renovations - the Energy Efficiency Directive and the Energy Performance of Buildings Directive - all existing buildings will have to meet the same energy requirements by 2050 such as those currently imposed on new buildings.

²<https://climate-advisory-board.europa.eu/reports-and-publications/scientific-advice-for-the-determination-of-an-eu-wide-2040/scientific-advice-for-the-determination-of-an-eu-wide-2040-climate-target-and-a-greenhouse-gas-budget-for-2030-2050.pdf/@@display-file/file>

³[Climate Roadmap 2050 2019 webb.pdf Swedish version \(regionstockholm.se\)](#)

An increased focus on reducing consumption-based emissions.

Consumption-based emissions are emissions from goods and services that are produced away from where they are consumed, also known as scope 3 emissions. To reach the goal of climate neutrality by 2050, these emissions need to be significantly reduced. Stockholm County aims to reduce greenhouse gas emissions to half from a consumption perspective by 2050, and the City of Stockholm aims to reduce the greenhouse gas emissions to half by 2030. Statistics to measure consumption emissions are under development, but the measurements that already exist indicate that consumption emissions are around 25 million tonnes of CO₂e per year in Stockholm County and are thus far greater than the direct emissions of around 4 million tonnes per year⁴. A clear target at EU level together with an EU-wide calculation methodology would be a step in the right direction to guide both strategic planning and decision-making and improve transparency and accountability for different parties.

Negative emissions required to achieve climate neutrality.

Reducing emissions is the top priority of EU climate policy. However, technologies for carbon capture and removal with permanent storage are needed as complementary measures to achieve the goal of climate neutrality. Sustainable biomass carbon capture and storage (BECCS) is one of the most cost-effective ways to address hard-to-reduce emissions. However, costs remain high, and it is essential to develop a framework where public and private capital can co-finance the industry, minimise costs to taxpayers and welcome the willingness of companies to adopt the polluter pays principle. To ensure that negative emissions do not affect the reduction pathway of the EU ETS and the Effort Sharing Regulation, the EU should have a separate target with a specific focus on the most difficult to reduce emissions. Carbon dioxide as a commodity in materials, chemical and energy industries is expected to increase rapidly, thus one of the most important initiatives at EU level is the establishment of an efficient common infrastructure for transporting carbon dioxide from where it is captured to storage sites and places for usage.

Synergies between climate adaptation, crisis preparedness and total defence will be made visible and used to reduce emissions.

Climate adaptation, crisis preparedness and total defence are three major societal challenges that all EU countries are facing and where a higher capacity for self-sufficiency and resilience is crucial. For both socio-economic and ecological reasons, the conditions for societal development are and will not be as they have been in recent decades. Major and revolutionary efforts need to be made in society to meet an increasingly extreme climate and to manage geopolitical and other socio-economic crises. A crisis preparedness and climate adaptation that is too short-term and reactive can risk increasing emissions as well as dependence on fossil-dependent technology. Conversely, a broader approach between crisis management and the transition to fossil fuel independence can rather create leverage effects that contribute to reduced human climate impact and strengthened climate adaptation and preparedness, at the same time as the climate issue does not risk being de-prioritised when other crises need to be managed. Thus, measures and instruments that drive towards more circularity, better natural resource management, increased spatial symbiosis (urban and industrial) and cross-sectoral collaboration, need to be emphasised and strengthened.

⁴The climate situation in Region Stockholm 2022, Swedish version: <https://www.regionstockholm.se/verksamhet/Regional-utveckling/statistik-och-analys/klimat/klimatlaget-i-lanet/>

Financing the green transition.

Implementing the EU-wide target of reducing emissions by 55% by 2030 compared to 1990 levels will require approximately EUR 1.04 billion per year, which will be largely covered by private finance⁵. Going forward, public authorities will need guidance on how to best use their investment capacity to mitigate risks and attract private capital. EU funding will be crucial for regions and municipalities and their ability to achieve the EU's climate neutrality target, as well as play a key role in accelerating the green transition. For the cities that have been selected for the mission 100 climate-neutral and smart cities by 2030, there are questions about how the Mission Label that the cities receive when they submit their climate contracts can be used, as there is currently no financial support linked to it. The Horizon Europe calls for proposals linked to the mission are an important source of direct funding, but unfortunately not enough to implement the necessary measures.

We are at your disposal should you wish to discuss Stockholm Region Association for European Affairs position on the European Union's climate targets for 2040 further, and please do not hesitate to contact us should you have any questions.

With kind regards

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⁵https://eur-lex.europa.eu/resource.html?uri=cellar:749e04bb-f8c5-11ea-991b-01aa75ed71a1.0001.02/DOC_1&format=PDF and <https://www.bruegel.org/blog-post/how-much-investment-do-we-need-reach-net-zero>