

Stakeholder consultation on the Staff Working Document “For a resilient, innovative, sustainable and digital energy-intensive industries ecosystem: Scenarios for a transition pathway”

Fields marked with * are mandatory.

Introduction

The [update of the EU Industrial Strategy](#) highlights the need to accelerate the green and digital transitions of EU Industry. Among the various instruments, the Commission proposed to co-create, in partnership with industry, public authorities, social partners and other stakeholders, transition pathways for ecosystems, where needed. Priority should be given also to sectors heavily affected by the crisis, which benefit from accelerating their twin transition in order to boost their recovery. Energy-intensive industries ecosystem has been recognised to be one of these critical ecosystems and therefore, it will be tackled among the first ones, by co-creating its transition pathway together with its stakeholders.

The Commission services have prepared a [Staff Working Document](#) to outline possible scenarios for a transition pathway for a more resilient, innovative, sustainable and digital energy-intensive industries ecosystem. This document aims to launch a co-creation process for concrete actions, milestones and commitments with all stakeholders of the energy-intensive industries ecosystem.

You are invited to engage in this process by sending your input through this online consultation form.

Based on the consultation results and further meetings with stakeholders, the transition pathway will be co-created, finalised and presented by December 2021/January 2022.

This survey will be open until 22 November 2021. You are, however, warmly encouraged to send your responses as soon as possible to facilitate early analysis.

In case of questions about this consultation, please send an email to GROW-HLG-EII@ec.europa.eu

About you

*** I am giving my contribution as**

- Academic / Research institution
- Business association

- Company / Business organisation
- Consumer organisation
- Environmental organisation
- EU institution
- EU citizen
- International organisation
- Network of organisations
- Non-governmental organisation (NGO)
- Local administration
- Regional administration
- National administration
- Trade Union
- Other

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*** Organisation / Network name**

European Environmental Bureau (EEB)

Publication of information

Unit GROW.I.1 will publish a report on DG GROW website with an overview of contributions and a summary of the input received. No personal information of the respondents will be published.

I agree with the personal data protection provisions.

[Privacy statement targeted consultations clean EII TP SWD.pdf](#)

Consultation questions

You are invited to reflect the different issues and scenarios presented in the Staff Working Document for the key dimensions of Resilience, Sustainability and Digitalisation. You may choose which questions you answer, and leave others empty. Please, in particular, propose concrete actions and targets. Quantifiable evidence is very much welcome.

2.1 Resilience

Please read and reflect the issues and scenarios proposed in the **Section 2.1** of the Staff Working Document.

What are the main challenges to ensure resilience in your specific industry or country? What are the key priority sectors, products and materials? Which steps are you and other actors taking to address them?

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Not applicable directly (we are not industry). From end user perspective&citizen of this world we would argue that the priorities to take care of is to ensure the “essentials” are safeguarded which will improve economy resilience. Industry can only exist as part of climate neutral & sustainable planet which requires us to not surpass planetary boundaries. Industrial activities present a major challenge to the inherent resilience of the biosphere, resilience of our planet & our economy will rely upon improving the resilience of industry without continuing to surpass the natural limits, beyond which industry is currently operating. Industry will be more resilient long-term, focusing on the most essential services that industry provides will be critical in determining the future of this ecosystem. This approach enables us to review the fundamentals of the economic model & to transition towards a sustainable economic model, see notably the “System Change Compass” https://www.systemiq.earth/wp-content/uploads/2020/11/System-Change-Compass-full-report_final.pdf see page 42 & following & <https://www.stockholmresilience.org/research/planetary-boundaries/the-nine-planetary-boundaries.html> Industrial activities must not affect planetary boundaries, the transition roadmaps should consider those as non- negotiable. The activity must be fully compatible with environmental goals & also focus on the following kind of ‘essentials’:

- Clean air (i.e.revised WHO guidelines)
- good water quality (& quantity) & sustainable water supply services
- rich & fertile soils
- Sustained nutrition: healthy nutritious food / drinks
- clean & affordable energy (non-combustion-based RES)
- good living conditions
- Daily functional needs: lasting, repairable products such as clothes, household & personal hygiene, communication
- toxic free environment (good health protection)
- smart mobility

The EII ecosystem should be a solutions provider to sustainably service those ‘essentials’.

What other issues in relation to resilience would you propose to be considered for this pathway?

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See Q1. The pathway document presents industrial resilience narrowly along access to resources, whereas resilience is about being able to prevent & withstand shocks. Links are not sufficiently made between industrial resilience, resilience of the biosphere, natural ecosystems, as well as that of downstream sectors. Focusing only on the resilience of a single ecosystem represents a silo approach, will lead to failure in terms of laying out a credible transition pathway for the sectors concerned. Worsening climate & biodiversity crises means less industry resilience, & it must also play its role in avoiding these worsening crises by aligning business values, decision making processes towards reduction of negative impacts at source before depending on techniques to reduce residual pollution that cannot be avoided. It is not possible to extract & produce our way out of the climate crisis, but the transition pathway focuses on facilitating continued & perhaps even increased production & consumption of resources & energy.

In terms of meeting our needs for critical raw materials, secondary material use is missing. Considering the volume of waste EEE & other products that require CRMs, only extraction is mentioned which strongly correlates with a primary raw material focus. Reducing material use overall can also improve the sufficiency of supply. Reducing at source can be done through product & process ecodesign of intermediary materials, focusing on de-materialisation of value creation & the use of materials that are resource efficient, highly functional, renewable, circular. Supported by more sustainable business models that create & extract value from existing resources through processes & services that are inherently de-materialised e.g. reprocessing for reuse or leasing. Dependencies in strategic areas should be addressed primarily with a detailed 30-year forecast of the actual needs of materials the EU is highly dependent on (Examples see Q4).

What additional or different output scenarios for 2030 and 2050 (cf. actions table in the SWD) would benefit the development of a resilient EII ecosystem?

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On (critical) raw material supply: A sustainable raw material masterplan looking at both primary & secondary raw materials would provide a strong basis to meet goals of the EGD&CEAP. Reducing primary raw material use, improves strategic autonomy/reduces foreign dependencies. This plan could absorb the planned supply network but placing it in a more systemic transition context, resulting in reduced foreign partners/imports due to the inclusion of secondary raw material supply chains...This masterplan would require background analysis for estimating the amount of materials the EU will need until 2030 & 2050, estimated circularity /recycling rates for each material, material efficiency strategies for each material, then find a solution for a (possible) production gap based on renewable sources. As highlighted, the assumptions of such an analysis should rely upon or support assumptions that we will inevitably require more & more materials, this can & should be curbed.

The outcome scenario relating to the sufficiency of raw materials should aim to bridge supply & dem& of circular materials & products with key sectors such as construction & automotive in order for the loop to be more effectively closed. In the case of C&DW, it is still 1/3 of all waste in Europe & a great deal of 'recycling' is in the form of inefficient backfilling or even landfill. This results in wasted resources, & a shortfall in material for reuse or recycling that can boost circularity & reduce CO2 emissions of industry. Measures foreseen under the 'Less waste, more value' stream of the Circular Economy Action Plan should ensure that sufficient supply of high quality materials are available for upcycling or high-quality recycling, & to boost recycling rates overall. Forecasts for material demand volumes over different scenarios in key sectors can help to accurately manage & phase-out primary production capacity in the medium-term. Also, a large portion of product related emissions are exported.

Can you provide any data or analysis on strategic foreign dependencies you face (of a given input or technology) to support the Commission's analytical work on strategic capacities and dependencies going forward? Can you provide evidence if you are stretched as a supplier of strategic inputs or technologies?

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Concerning the automotive sector, data show that in the last 30 years the number of sold passenger cars in the EU has never been higher than 15M, whether in the last 10 years the yearly average number is 14,7 M. By coupling material efficiency & de-motorisation strategies, it looks safe to say that the automotive sectors will use less steel in the future. Source <https://www.acea.auto/figure/motor-vehicle-registrations-in-europe-since-1990-by-country/>

- IEA, 2019. 'Material efficiency in clean energy transitions & 2021, Industry in a net-zero emissions world: New mitigation pathways, new supply chains, modelling needs & policy implications'
 - construction & automotive use 53% of the EU steel;
 - typically, the industry overuses steel; the IEA indicated that a global reduction in per-capita end-use of steel of 40% is possible, with the largest savings in steel demand occur from vehicle light weighting & from improving buildings design, construction & reusing steel.
 - Likewise, comparable savings can be reached in the cement (26%) & aluminum sectors

Linked to previous Q: Industrial leadership in the EU on driving down impacts would represent strong EU leadership & give EU industry a first-mover advantage. While such an outcome is not pursue EU EII industry is falling behind. The IEA recently identified that basic materials industries could reduce their GHG emissions by 30% through material efficiency

2.2 Sustainability

Please read and reflect the issues and scenarios proposed in the **Section 2.2** of the Staff Working Document.

Are the energy-intensive industries on the right track to achieve our targets (climate neutrality, biodiversity, circularity, zero pollution, social fairness)? In which areas are the action gaps between where we want to be and where we need to be greatest?

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NO' to all the parameters / themes. Greatest gaps are as follows:

1. Lack of coherence on the Zero Pollution Ambition which goes beyond carbon neutrality objective (to capture the resource use impacts) & integrates the circular economy approach
2. The draft does not address demand side related aspects of this transition but focuses on 'cleaner' production, 'greener products' & markets as well as technology focus aspects only. The document is consequently primary producer focused, & does not make the required sectoral & societal links
3. The action plan is too focused around creating markets for EU industry & financing "innovation" without specifying what the purpose of the "innovation" should serve. The avenues identified are not aligned to the integrated approach on zero pollution but rather focused on decarbonisation only. The current pairing of finance & innovation is centred on securing positive investor sentiment for companies still focused on fossil-fuel use. If transformative investments or business model changes are required the firms may lose overall value, but the net result for the economy & society would be more positive.
4. The proposals fail to internalise external costs in relation to pollution / negative impacts (pricing pollution, aligned to the pollution prevention at source, polluter pays & extended producer responsibility principles), little is developed on those aspects. There should also be a requirement for firms to distribute

/offset the green premium of low-carbon products to other parts of their portfolio to bring down the so-called 'green premium' to prevent this being a continued bottleneck to demand & uptake of low-carbon products.

5. Section 3 as to policy drivers is empty on the 'substance', it just lists current policy initiatives without concrete action plan & outcomes to be achieved e.g. priority elements according to a value or circular economy hierarchy, & in what way the policy instruments should be adapted.

What other issues or barriers in relation to the green transition would you propose to be considered for this pathway?

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Other issues:

- Appropriate tools to internalise negative externalities & enforce the polluter pays principle should be considered to reverse the production cost gap between high-carbon & zero-carbon technologies & processes. When prices will show the "environmental truth", zero-pollution processes will become mainstream. Any support scheme (funding / research project) should be checked against a 'best value for money for the common interest' test, which should be applied for funding prioritisation that would demonstrate higher env payback of sufficiency & circularity
- The CBAM should evolve to a robust mechanism for global environmental level playing field (CBAM+) so to not harm zero pollution ambition frontrunners in the EU and should cover all tradable goods & services that are relevant to the EII "ecosystem" & include all relevant emissions

Barriers:

- Art 26 of the EU ETS Directive preventing a combined approach of market based approach to work hand in hand with regulatory / performance based standards to drive for faster green transition. The EU ETS benchmarks need to be adapted so to set it on the entire sector / activities life cycle impact & not differentiate by process or technology options but by desired output (product/service). The current approach prevents forward looking determination of best achievable techniques options. Free allocations must end by 2023 due to circumventing the polluter pays principle.
- Stronger drivers for sustainable products, see sustainable product initiative (SPI), as well as green /sustainable public procurement, Since the SPI would apply to any entity wanting to place their product on the EU market, it would level the international playing field & reduce loss of EU competitiveness risks, & boost EU firm first-mover advantage. Requirements & standards should adopt a functional + sustainability performance-basis to foster greater sectoral sustainability. Carbon footprinting alone falls far short of what is needed.

What additional or different output scenarios for 2030 and 2050 (cf. actions table in the SWD) would benefit the development of a sustainable EII ecosystem?

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- A Strategy to transpose a value retention/circular economy hierarchy as a top-down prioritisation of measures for decarbonisation of EIIs down from sufficiency, to reuse of products, to upcycling, & then to recycling which typically downcycles materials via primary producers. Reuse is not recycling in a circular economy. A strategy for the most environmentally beneficial use of products & materials should be the starting point. The current thirst for recycled steel results in no net benefit for one producer using more or less than another, but this results in a shortage of products for reuse as a product following reprocessing, meaning the circular economy is underperforming in terms of delivering benefits as a result of EIIs mitigating continued fossil-fuel reliance. The fundamental materials are the root cause of the economy wide issues related to decarbonisation.
- A strategy to increase the reuse of elements used for key sectors such as those found in buildings or vehicles should be accelerated with the potential to decarbonise products by triple the EII decarbonisation

target laid down in the SWD, over 90% reuse is achievable by 2050, which would deliver 81% of EII decarbonisation, with the rest delivered by use of renewable energy for residual production & processing, WITHOUT THE NEED FOR ANY CARBON CAPTURE or other fossil fuel technology.

- A strategy to reduce energy demand of EIIs by e.g. 25% by 2030.
- Use of economic (ETS & internalisation of negative externalities) & regulatory instruments (at EU level through Regulations to allow a harmonised development of all member states) in parallel to speed up the energy transition. Requirements of green PPAs?
- Localisation of material supply chains

see further links to the KPI (target setting performance indicators) in section 3.7, the meaning of “sustainability” needs to be further defined.

Are there specific targets already set in the roadmaps by the different EII sectors to define where the EII wants to be in 2030 in terms of transition toward climate neutrality and in terms of circularity?

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It should be science & commitment to making the zero pollution ambition a reality that should define the course of action, not what industry “wants” to do/ “where the EII wants to be” in a given timescale!

Industry roadmaps such as that laid out by CEMBUREAU, & modelling by the Commission itself align with a scenario where far too little progress has been made by 2030 while the IPCC AR6 report <https://www.ipcc.ch/report/ar6/wg1/> shows that significant progress must begin today if we are to achieve a ‘very low carbon’ scenario that gives us a chance of a 1.5 future in line with the Paris Agreement & recent COP conference.

The roadmaps produced so far clearly show a status quo in terms of fossil-fuel reliance until 2050 & no end to resource & energy consumption at an intense scale which makes them unsustainable today & in the future. These roadmaps need to be restructured according to a transitional pathway targeting long-term sustainability & climate disaster risk aversion. Make EIIs just industrial in their support for sustainability.

What actions are required to create lead markets for low carbon products?

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- The SPI should open a new frontier on wider product policy, building on part of the work of the Ecodesign Directive & extending it to functional & environmental performance of these intermediary products (materials) according to their eventual to key end-use products (automotive, construction products, & electronics/electrical/digital appliances). The SPI should apply key Ecodesign principles to key EII materials, namely progressive setting of minimum performance requirements based on a common approach to lifecycle assessment of environmental performance that includes all upstream impacts, production & supply routes, & excludes the worst-performing products. The SPI should also apply ecodesign style implementation to intermediaries to ensure exhaustive assessment of viable production & supply performance levels, & not a limited view as per ETS benchmarks. Communication & validation of sustainable product claims should also cover those made against intermediary products at a corporate level & in the value chain, with market surveillance validating & enforcing regulatory requirements. This will be essential to avoid greenwashing of high-impact materials & uphold credibility of environmental performance claims across all EII sectors. ‘Sunrise’ measures could help with legal certainty as performance requirements enter into force over incremental time periods.
- Mandatory elements of green/sustainable public procurement.
- internalisation of negative externalities & the enforcement of the polluter pays principle are key and should be accompanied by regulatory measures aimed at shifting the tax burden towards environmentally

harmful activities.

- A forward looking CBAM+ for ensuring a global environmental level playing field so to not harm zero pollution ambition frontrunners in the EU should address other pollution aspects beyond carbon & cover all tradable goods & services that are relevant to the EII “ecosystem”

What additional initiatives could facilitate secondary raw material transfer from one industry sector to another or internally within a sector? What actions are needed to boost demand and secure supply? Is it possible to double the circular material use rate by 2030 in line with the Circular economy action plan?

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- Creating value through dematerialised services, & the highest levels of circularity above recycling, namely reuse of products should be employed as a priority. ‘outer loop’ recycling is deployed by industries aiming to cut inefficient use of resources at the primary production level. Waste prevention through scaled down primary production would therefore be a more effective measure. While waste streams do exist, it should be ensured that carbon accounting fraud is not committed through discounting of CO₂ from more than one process/product.
- Mandatory recycled content in new products should be set, but this should only include post-consumer recycled content to avoid negative rebound of increased demand for waste output leading to increased waste production. Use of recycled content from the huge volume of C&DW for example would be a much more environmentally beneficial source than industrial waste streams that result from EEI processes e.g. recycled concrete fines in cement as substitute for clinker than blast-furnace slag, the latter helps offset the carbon footprint of inherently energy-intensive process, & increases our lock-in to intense, high-waste processes.
- Restrictions on exporting waste outside Europe
In relation to industrial activities (production):
 - require the mandatory elaboration of a ‘Circular Economy Plan’ (CEP) guided by the waste/circular economy/value retention hierarchy, with clear, monitorable objectives, quantitative targets, & performance indicators with action timeline, that is introduced as part of the permit conditions / review.
 - systematic setting of mandatory BAT-associated performance levels (BAT-AEPL) that act as circularity boosters & enhancing public accessible reporting against relevant indicators. The following metrics are considered as essential (environmental footprint, potential of substitution & full coverage of environmental impact with fate of waste phase
see KPI section

In addressing the challenges outlined here, how do you see the respective roles of the Commission, Member States, industry, social partners and other stakeholders? Do we need new or amended legislation, international agreements, new institutional structures, new standards, targeted funding, industry initiatives, targeted research and innovation, better communication or any other action towards a more innovative ecosystem?

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COM: set clear & binding pathway based on an efficient & circular use of materials through reuse & recycling targets. Focus resources on zero-impact techniques & to set aside the “technology neutrality” dogma. Adapt state aid / finance mechanisms & regulatory push. Enhance consistency across the different DGs to launch coherent regulatory signals. More suggestions in Section 3.
Technological innovation also needs better guiding, to ensure that problems are addressed at the source without shifting impacts to other areas, & to ensure the appropriate impacts prevention & then reduction

pathways are developed. One such technology assessment tool can be found here: <https://www.sehn.org/sehn/2021/9/15/a-decision-tree-for-technological-solutions>

MS: work together in solidarity under an EU perspective, leaving aside national interests. Under the new objective of net-zero emissions production, the optimal location for production may shift from being close to demand centers to places where zero-emissions energy is cheap & readily available.

Industry: implement symbiosis aimed at 0 waste, review its usual way of working, use materials in a more efficient way. The goal is to separate the various components of industrial sectors into a physical production process flow model. This is to allow the modelling of replacement of currently high emissions subprocesses in supply chains (e.g. iron ore reduction & limestone calcination) with zero emissions ones, allow potential trade in intermediate products within the process flow model. For example, in the case of steel: mining, iron reduction, smelting, & finishing would be separated to allow capital-for-energy substitution, inter-fuel substitution & alternative subprocesses e.g. green reduced iron or clinker.

EU standardization strategy is a key opportunity to ensure standards work for the environment
See <https://ecostandard.org/wp-content/uploads/2021/09/ECOS-views-on-the-Roadmap-for-the-Standardisation-Strategy.pdf>

2.3 Digitalisation

Please read and reflect the issues and scenarios proposed in the **Section 2.3** of the Staff Working Document.

Which digital technologies are the most relevant for the EII ecosystem or for your specific industry? Which ones are you already applying today and which will require more time, funding and coordination?

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Digitalisation in itself can have considerable negative environmental (energy demand) impacts and social implications & therefore the introduction of digitalisation should have specific criteria developed to avoid the over-expansion of little controlled tools. Electronics/electricals have been addressed through the Ecodesign Directive, WEEE & ROHS but with too narrow focus on energy in use phase, a small number of hazardous substances with considerable & questionable exemptions, & with little influence via end-of-life management on the actual design of clean products, & largely unknown destinations for exporting of what is hazardous waste (e-waste). The digitalisation agenda should address these shortcomings before it explodes massive expansion of use of further devices. Digitalisation must result in considerable contributions to reducing environmental impacts.

Digitalisation shall also be used as a means to improve pollution reduction at source, benchmarking & tracking progress towards delivery on the zero pollution (impact) ambition & improve accountability in decision making processes (see Q13).

Efficiency improvements & information via digitalisation have limited impacts compared to fundamental changes to industries & materials, but they can be facilitators. The Ecodesign Directive should introduce ambitious requirements for all relevant technologies to be used in transitioning industries moving forward, as their impact is substantial.

What are the main barriers to uptake of digital technologies in the EII ecosystem?

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For the above to occur, reliable data to portray industrial process flows model components & their alternative primary production technologies are required. Ideally this would be in an open-source format that disaggregates the key sectors & processes & their capital & operating cost components & characteristics. Once models can portray demand & supply decarbonization mitigation options & their impacts in individual regions, they can better inform industrial & climate policy.

Transparent & easily searchable data are key to ensure benchmarking across the whole EU industrial sectors, to keep progresses under control & possibly set corrective measures, as well as to ensure compliance with the Zero Pollution & Climate Neutrality ambitions of the EU as needed. At the moment, the level of transparency is totally unsatisfactory, despite the requirements set by EU law. (See more here as to industrial point sources <https://meta.eeb.org/2020/10/22/industrial-pollution-its-time-to-enter-the-digital-age/>)

How can data collection, use and sharing (in and across sectors) be increased to improve resilience, sustainability and competitiveness of the EII ecosystem? What issues need to be tackled?

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Comprehensive, relevant, & transparent headline data from basic & intermediary material level, down the end-products is needed on all relevant sustainability & functional performance characteristics. Examples: Background: <https://meta.eeb.org/2020/10/22/industrial-pollution-its-time-to-enter-the-digital-age/> & EEB feedback to the E-PRTR revision: <https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/>

- US EPA - Canada - Mexico (enables comparability of strictest permit conditions) , enabling a comparison of the permit ambition in decision making <https://cfpub.epa.gov/rblc/index.cfm?action=Search.BasicSearch&lang=en>
- We welcome the idea of digital product passports, in order to make it happen with no greenwashing risks, transparency should be ensured & this involves an overhaul of the EU PRTR / other reporting systems (see EEB input to E-PRTR review). In this respect, building on the EU Commission EPREL database might be a good idea. It gives partial access to household data to consumers & total access to market surveillance authorities. To ensure total transparency, total access to product passports data should be ensured also to civil society https://ec.europa.eu/info/energy-climate-change-environment/st&ards-tools-&-labels/products-labelling-rules-&-requirements/energy-label-&-ecodesign/product-database_en
- Further initiatives to enhance comparability & usability of sharing data can be enhanced through related initiatives such as the Non-Financial Reporting Directive / Corporate Sustainability Reporting Directive review ongoing, as well as indicators set for the 8th EAP implementation. This requires that KPIs (see section 3.7) should be integrated in those policy initiatives as well. Data collection & access should be taken from a global comparability perspective (harmonised coding of reporting streams e.g. NACE codes used, mandatory indicators for the value chain etc)

What other issues related to the digital transition would you propose to be considered for this pathway

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Digital tools should be used to ensure accountability & transparency, in order to make enforcing authorities as informed as possible when it comes to reaching the set targets & tracking progress towards those targets & efforts implemented by the economic actors involved. The same applies for standards making processes e. g. COM expert groups or state aid decisions / prioritisation as to R&D. The end user perspective is therefore

very key (see link with reporting against the global SDG goals & the EU's 8th EAP monitoring framework). For the moment not even basic data is publicly available in user-friendly manner e.g. water, energy consumption & production volumes for large scale industrial production. See also OECD report "Using PRTR information to evaluate progress towards the SDG goal 12" https://www.oecd.org/chemicalsafety/pollutant-release-transfer-register/using-prtr-information-evaluate-progress-towards-sustainable-development-goal-12.pdf?utm_source=Adestra&utm_medium=email&utm_content=Using%20PRTR%20information%20to%20evaluate%20progress%20towards%20the%20Sustainable%20Development%20Goal%2012&utm_campaign=%2825%20Oct%202021%29%20PRTR%20SDG%20report%20&%20video%20%2B%20DASS%20webinar&utm_term=env

What additional or different output scenarios for 2030 or 2050 (cf. actions table in the SWD) would benefit the development of an innovative EII ecosystem?

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supplement to Q 2

it is important to clearly acknowledge that recycling of usable products & materials deemed as waste is downcycling as it degraded the functionality & value of a resource. As is the case with steel, this typically involves an energy intensive process that makes minor savings to primary production emissions, as opposed to eliminating the need for primary production that prevent up to 90-100% of emissions rather than the far low levels of emissions savings achieved when remelting steel in coal-powered BF-BOF route. Reuse, high-quality recycling, closed loop recycling, & other forms of upcycling should be the most effective levers for circularity, many of which are already viable today (mechanical recycling routes) & developing business models that gain value from dematerialised means (i.e. leasing, sharing, etc.). Most important is to explore how to significantly dematerialise as a means of reducing significantly the use of resources & energy. Incumbent EII producers & associations are focused on inefficient downcycling to help decarbonise pollutant & energy intensive primary production processes. However, while this helps drive down impacts temporarily it means that there is a continuous shortage of products & material for direct reuse or higher quality recycling. Secondary steel demand at the current scale means higher recycling rates has no positive benefit on global emissions of the sector. Scaling down primary production & shifting end-of-life steel use to reuse & high-quality reprocessing/closed loop recycling would make a real difference. By 2050 we could meet our total demand, while industry forecasts based on ever increasing demand for new steel says otherwise, there is a choice to which direction we see EII sectors going, the former being in line with an absolute zero climate impact / hopefully pollution impact future, & the latter being damage limitation that still relies upon primary production based value creation

What are the implications of digital technologies for the EII ecosystem and for the main skill requirements and training needs in its sectors? How could they help increase innovation, resilience, competitiveness and sustainability? Do you see any risks in the use of digital technologies and how could these be addressed?

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no comment

Is policy intervention/coordination required to move forward on the use of digital technologies in EII's ? If so, in which way and by which actors?

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Yes. We expect a revision of the E-PRTR & IED reporting system. Product passports are not yet in place & the SPI is upcoming, see here for more information <https://eeb.org/library/eeb-input-to-e-prtr-impact-assessment/> + https://eipie.eu/wp-content/uploads/2021/07/IED-Review-TSS_EEB-_-FINAL-Submission-8april2021.pdf
There should be coherence with objectives set under other ongoing & related initiatives e.g. 8th EAP, CSRD /NFRD, SDG reporting (see Q14 & 15). This also links to proper design & content of the KPIs (see Section 3.7)

In addressing the challenges outlined here, how do you see the respective roles of the Commission, Member States, industry, social partners and other stakeholders? Do we need new or amended legislation, international agreements, new institutional structures, new standards, targeted funding, industry initiatives, better communication or any other action towards a more innovative ecosystem?

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see section 3.1

3.1. Enabling regulatory framework

Please read and reflect the issues and scenarios proposed in the **Section 3.1** of the Staff Working Document.

What more or different would be needed in order to support the transition? Which elements are missing or do you find insufficient in the current regulatory framework?

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The regulatory framework should explicitly address the Zero Pollution Ambition of the EU & concretise it with an action plan delivering on the ground. Links with key sectors & product initiatives is missing at the highest levels of the waste/circular economy/value retention hierarchy.

In this respect, the internalisation of (externalised) costs of pollution in industrial activities will require consistent work across the various DGs, as well as at MS level, to send a strong signal to the market & mitigate potential social consequences of this shift of the polluter prevents at source & in all cases pays principle. A coherent policy framework ensuring the enforcement of the intermediate goals & data transparency is essential, as well as precise targets for various outputs. NGOs have set out the following 10 key priority measures along the value chains of the Industrial Strategy <https://carbonmarketwatch.org/wp-content/uploads/2020/02/green-NGOs-interservice-letter-vicepresident-.pdf> :

1. Promote a transition towards a circular economy with a zero-waste objective
2. Support renewable H2 & sustainable biomethane
3. Make targeted use of biomass
4. Promote a 100% renewable grid
5. Increase electrification of processes & reduce energy demand
6. Secure increased materials safety & efficiency
7. Promote production improvements
8. Limit & target the use of CCS & CCUS
9. Embrace digitalisation solutions to facilitate the transition.

10. Identify & engage multiple champions to drive forward the industrial transformation & needed system change.

Further aspects: product requirements (SPI, Ecodesign Directive expanded beyond energy in use phase), GPP, true cost pricing (ETS, ETD, plastics tax, etc), IED&EU BREFs review rules revision to drive and accelerate the adoption of innovative techniques for decarbonisation revision of ETS benchmarking procedures to drive innovation. Demand side pathways require broad policy approaches involving many actors.

Which roles do the EU and the national level have in addressing this?

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EU

- Effective policy coherence
- binding targets through regulations & a coherent regulatory framework across the DGs to speed up the transition & align Fit for '55' in order to make it fit for climate science/Paris Agreement (65% CO2 reduction by 2030, climate neutrality by 2040)
- steer economic aids only towards zero-pollution techniques
- rapid enforcement actions (e.g. meaningful financial penalties)
- promote best practices, review BAT determination method so to set standards based on technical achievable options rather than affordable to industry
- rigorously implement the polluter prevents first & pays principles
- providing for a 'combined approach' of market-based instruments with regulatory (performance) standards, removing policy inconsistencies (Removal of Art 26 of the EU ETS/ redraft Article 9 of the IED). See further points (section 2) https://eipie.eu/wp-content/uploads/2021/07/IED-Review-TSS_EEB-_FINAL-Submission-8april2021.pdf Set GHG performance standard set to 100gCO2eq/KWh, Emission Performance Factors (EPF) acting as EUA price multipliers, mandatory energy efficiency requirements & forward looking process change BAT e.g. electrification, preference for secondary EAF route for steel making.
- change EU ETS benchmark design: cover the entire sector / activities life cycle impact & not differentiate by process or technology options e.g. as is the case for cement production (limited to clinker) or like for iron & steel (differentiated by process route & also output grades), new approach should be "one product/service, one benchmark"
- end free allocations by 2023 due to circumventing the polluter pays principle

National

- shift tax burden from consumers to operators of harmful activities
- introduce minimal carbon price floors / setting EPF
- resist in derogatory permit practice & (ab)use of flexibility in ambition level & instead require strictest industry pollution prevention standards
- improved RES penetration rates

How important is public procurement for your industry and how could green public procurement help create lead markets for sustainable, low-carbon and circular products

2000 character(s) maximum

GPP enables small scale producers to gain markets & expand their sustainable & circular production. However, building codes & vehicle type regulations can prevent the uptake of high benefit circular practices, namely reuse & use of innovative or novel materials highlighted within the SWD. Only those put forward by incumbents are seemingly viable, such as those from the cement sector who actively block the use of low-

carbon cements at national level. While frontrunners exist, the stragglers set the pace until they can no longer delay change, EII sectors need to be driven to change through a sound legal basis that sets broad performance requirements based on the least impactful means of supplying a product or material.

What other options, in addition to public procurement, could help the creation of these lead markets?

2000 character(s) maximum

Ensuring that product prices reflect the environmental truth through a proper account of carbon & pollution negative externalities. In this respect, the regulator should use both the market based & regulatory approaches & create market-sensitive tools, & on the other ensure a meaningful account of these externalities (e.g. minimum carbon floor at 105€/ton, minimum pollution price floor) & internalisation of other environmental impact costs e.g. air pollution, water abstraction, hazard exposure due to chemicals. Once the price signal will include negative externalities, the market will move towards cheaper alternatives. To avoid price choc for consumers, it is important that such a measure is taken together with a comprehensive tax reform aimed at shifting the tax burden from taxpayers to harmful activities.

In the case of buildings, product acceptance plays a big issue. Currently standards that are harmonised at European level, or national standards often act as a barrier for the use of low-carbon building materials or design approaches that reduce the impact & volume of materials used. For example, building codes used as the basis for GPP criteria often specify the acceptance of certain materials & certain structural parameters (i. e., load limits) that must be met. These are not consistent across Europe & can lead to overuse of material & use of materials that are far more impactful than those available elsewhere in Europe. EU level action on sustainable buildings is needed, & the support EIIs in this transition should be coordinated with relevant policymakers at EU & MS level. Lastly, the EU urban agenda should operationalise policy measures to prevent urban sprawl to make best use of existing space

Which economic and/or regulatory instruments could support the development of new business models and support the competitiveness of sustainable solutions?

2000 character(s) maximum

Examples from chemical industry: chemicals leasing, see further substitution case studies by applications here <https://marketplace.chemsec.org/> Regulatory drivers are the toxic free environment goals, REACH substitution, Eco-Label / Design, Environmental Quality Standards etc.

3.2 Financing of projects and activities

Please read and reflect the issues and scenarios proposed in the **Section 3.2** of the Staff Working Document.

How can private investment in the EII ecosystem be better geared towards the necessary green and digital transitions?

2000 character(s) maximum

Sustainable taxonomy clarity on gas & nuclear to avoid shifting burdens from pollution intensive activities & to drive investments in reduced energy & resource use, RES, circularity (zero pollution ambition).

The sustainable finance taxonomy should set more ambitious climate change mitigation criteria which is currently set according to inappropriate & unambitious ETS benchmarks that are focused on efficiency of

specific production routes, & not of the most performant means of supplying a material to the market. Criteria for circular economy contributions must also be developed for the supply & manufacturing of relevant EII materials such as cement & steel. This should be focused once again on the highest levels of circularity in terms of environmental benefits to the economy & society.

Can the framework conditions for private investments in these sectors be improved?

2000 character(s) maximum

Yes, see Q24

Finance policy should consider how to de-risk more sustainable investments, while mitigating interest in harmful activities, for example through a parallel harmful taxonomy that negatively labels investments in highly unsustainable practices such as relining of coal powered furnaces as opposed to decommissioning & transitioning to an (100% non-combustion RES powered) electric arc furnace. Red labelling of investments as harmful would certainly affect investment decisions. However, continued fossil fuel reliance and support even provided by redirect of HORIZON / Process4plant investment to end of pipe fossil-based solutions (e.g. CCUS), as reflected by industry wishes alone within the SWD will not help. See EEB positions on the CEEAG that provide some proposals that could be applicable to private investments as well

<https://eeb.org/library/eeb-comment-on-the-guidelines-on-state-aid-for-climate-environmental-protection-and-energy-ceeag/>

Where do you see gaps in the current funding landscape which put at a disadvantage the EII ecosystem?

2000 character(s) maximum

See Q20 linked to bad design of the EU ETS benchmarks & hence the innovation fund. Free allowances are subsidizing the continued use of fossil fuels & dirty production processes & should be abolished as soon as possible. The bad examples highlighted previously are both from EII (iron & steel & cement production), another bad example is for hydrogen production (also an enabler for EII transition): the product benchmark refers to steam reforming of hydrocarbon feedstock (fossil gas), but the production of hydrogen through electrolysis is not described. Once an installation for example switches to hydrogen based on electrolysis using renewable or low-carbon electricity, it would fall out of the scope of the EU ETS Directive & therefore no longer be eligible for free allowances, whereas its competitors that continue to focus on conventional emitting hydrogen processes would continue to receive free allowances (with market value) it could make-business with. A level playing field for sustainable frontrunners to reduce carbon emissions from entire value chains should be provided, the EU ETS scheme should incentivize frontrunners delivering further emission reductions. In short, the ETS funding system should reward, not penalize frontrunners. Needs a new approach on the benchmarks design: "one product/service, one benchmark" & end of free allocations by 2023 due to circumventing the polluter pays principle (those activities still emit CO2 but do not pay). See further comments on state aid and need for "best value for common interest" test to be applied for funding prioritisation <https://eeb.org/library/eeb-comment-on-the-guidelines-on-state-aid-for-climate-environmental-protection-and-energy-ceeag/>

Is there any incoherence between different funding streams which affects the transition in the EII ecosystem, and how could this be addressed?

2000 character(s) maximum

Funding streams are used to fund technologies incompatible with the urgency of climate & environmental crisis. Incoherences:

- The Process4Planet partnership includes in its operative objectives (OO):

- OO2: replacing fossil fuels with biomass in processes, which is far from being carbon neutral
- OO3: Develop new CCS projects, a technology that has never demonstrated its efficacy despite being around for decades, & which risks us surpassing 1.5C carbon budget levels given marginal abatement achieved to date & the lack of guarantees that the captured carbon will not reach the atmosphere.
- In the same document, it is estimated that only 85% of CCUS projects will reach TRL9 status by 2040 (no clear minimum amount of CO2 captured), against 100% of renewable energy integration, electrification, & heat reuse to get a zero-carbon steel sector or DRI, hydrogen projects.
- No KPIs concerning other-than-CO2 emissions reduction.
- a prioritisation of techniques & solutions options able to ensure the best value for money to common interests is missing. Such a prioritisation should escape the “technology neutrality” dogma & purely technological solutions to solve problems. Instead:
 - As a first step, there is a need to rethink production & consumption patterns in the first place (business models like chemicals leasing). No funds are foreseen to address this issue.
 - Implement a full circular economy policy (reusing, remanufacturing, recycling). To support this marginal abatement cost curves & studies should focus on proving out the avoided emissions of highly beneficial circular economy practices.
 - Apply energy & resource efficiency first solutions
 - Only then, focus funding on direct electrification with renewables.
 - Lastly, focus funding to only renewable hydrogen projects to address the need for primary steel production (following improved secondary EAF route through RES secondary steel outputs)

What is the role for the public and the private sector, and for the EU, national and regional level in providing funding in support of the transition in the EII ecosystem

2000 character(s) maximum

At regional level, EU & national funding should help build the circular value chains required to ‘re-shore’ & localise industrial processes for reuse & reprocessing. Infrastructure & capacity will be needed within a short radius of cities to also shorten the supply chains we have today.

3.3 Infrastructure and energy needs

Please read and reflect the issues and scenarios proposed in the **Section 3.3** of the Staff Working Document.

Where do you see shortcomings in the current infrastructure that would have to be addressed in order to support the transition of EIIs?

2000 character(s) maximum

Focus on infrastructure for electrification including energy storage to manage energy supplied by renewables. Reduced energy consumption overall is needed to avoid sustained need of fossil fuels while going fully electric. Hydrogen use should only be electrolytic renewable hydrogen using solar or wind power (or other non-combustion based RES) for production.
See EU ETS Benchmark shortcomings in relation to hydrogen.

Do you see any risk of stranded assets and misguided investments and how could this be prevented (e.g. through mid- to long-term roadmaps that inform investment decisions)?

2000 character(s) maximum

As highlighted in the funding part, we see risks that present funding choices will create stranded assets, particularly concerning fossil fuels use. Relying on techniques that still foresee the extraction & combustion of fossil fuels is unsustainable & undermine the climate neutrality & zero pollution ambitions of the EU. For instance, CCS & CCUS are far from being carbon neutral, & are not pollution-neutral at all. As a matter of fact, CCS cannot trap all carbon emissions & continued emissions of methane occur along the value chain due to leakage or gas flaring & increased upstream impacts due to the energy penalty coming with CCS. Instead, it will create a lock-in to gas for decades to come (such as new gas infrastructures) & divert precious public resources from most efficient, sustainable & cost-effective pathways to decarbonize its economy & create jobs.

Also biomass is not compatible with a decarbonisation path, it can be as carbon-intensive as gas (see RESET project <https://eeb.org/library/the-reference-environmental-standards-for-energy-techniques-reset-guidance/>).

Beyond that, we see also a risk in developing an industrial strategy coherent with EU's environmental target without assessing what we will actually need in term of materials, & how we can satisfy those needs through a comprehensive rethinking of production & consumption patterns in the first place, as well as a massive deployment of efficiency, sufficiency & circular economy strategies.

This report on steel shows how & when different steel firms should invest to avoid this risk: <https://industry-tracker.org/research-analysis/steeling-for-net-zero/> the choice of investment & perception of risk differs between industry & environmental stakeholders

Are energy providers and network operators in your view aware of increased decarbonised energy and infrastructure needs? If not, how could this disconnect be addressed?

2000 character(s) maximum

They are, in some cases leading to weird situations of 'intellectual disconnect' e.g. French government lobbying for having nuclear energy & gas combustion plants new builds up to 2030 EU Taxonomy aligned, the latter is not even supported by EDF. The role of fossil gas as a "bridging technology" is putting economic actors in a gas trap, benefitting countries with questionable track record as to the European way of life (democratic principles).

In your view, are the technologies required for a resilient, green and digital EII ecosystem already available or do they yet have to be developed? Is the challenge essentially about commercial viability and scale-up or also about early-stage disruptive technologies? What is feasible and what depends on some hypothetical disruptive technology?

2000 character(s) maximum

Most of them are already available, the question is rather about economic viability (see lack of external cost internalisation that blurs this Cost-benefit assessment). DG GROW should refrain to think exclusively in terms of commercial viability but instead deal with root causes of market failures first, a reality check for certain markets e.g. CCU markets should be made

For those not already acknowledged or scaled up, namely those processes to support reuse & closed-loop /high-quality recycling, support for these are key. For example, in steel an electric arc furnace is being used with a new process that extracts copper contamination to supply the highest quality aerospace steel containing recycled content (source <https://ukfires.org/steel-arising/>) yet EUROFER claim that technology doesn't exist apart coal-powered primary production to supply this level of quality material. Primary

producers cannot dominate the dialogue in this way, & the European Commission need to open up to innovations not focused on primary productions to see 'the forest among the trees' for each sector.

Further readings <https://ukfires.org/unlocking-absolute-zero/>

In your view, is there sufficient emphasis on the social and demographic impacts resulting from the transformation of the EILs, including by engaging and actively involving affected citizens and communities in addition to the social partners?

2000 character(s) maximum

no comment

3.4 Skills, training and just transition

Please read and reflect the issues and scenarios proposed in the **Section 3.4** of the Staff Working Document.

In your view, what are the main social and just transition challenge connected to the EIL ecosystem's transition, and how do you see their scale?

2000 character(s) maximum

As for the present energy transition from coal that is taking place in several EU regions, the main risk is that this transition is unmanaged or, even worse, actively hampered by Member States, industry players & other stakeholders. Such behaviours will inevitably slow down the transition, & will fall on the workers' shoulders, which could also delegitimize the industrial transition itself.

The loss of "unsustainable industry" jobs should be immediately covered by the presence of new opportunities & early- retirement schemes for the workers too old to be reskilled.

Also, a proper accounting of negative externalities in material prices will likely bring an overall rise of prices for consumers. To mitigate this, a wider rethinking of the taxation burden should start, & solutions concerning energy efficiency of buildings & demand-side management should be massively deployed.

Do you have precise projections of the employment and reskilling needs for your sector and what actions are you taking?

2000 character(s) maximum

no comments

Does the just transition agenda put sufficient emphasis on the needs of affected citizens, including workers but also their families and especially young people, as well as the communities, and regions they live in? If not, how could these be addressed?

2000 character(s) maximum

As for much of this document, there is a worrying disconnection between the introductory narrative on the different sections & the resulting proposed elements to make up a proposed roadmap (or two). This is also the case for citizens, workers' families, etc. Apart from mentions of the JT, which is narrowly addressing coal-dependent regions, & transformation is needed more broadly, with societal engagement.

The IED is mentioned once in an introductory paragraph & does not feature as to strengthening permitting related aspects such as access to information, public participation & access to justice (based on the Aarhus Framework) to ensure that industrial transformation is done in coherence with societal demands & expectations. The public concerned should have the possibility to "veto" a permit decision giving a green light to new/continuation of an industrial activity that does not satisfy the zero-pollution ambition (this may require to amend article 5 of the IED).

To what extent do you think will up/re-skilling be achieved in your industry and in your region?

2000 character(s) maximum

no comment for now

In your view, what will be the distributional impacts of the EII ecosystem's transition – across the whole population (not only for persons working in EII) – on disposable income, energy poverty or access to some essential services? What could be relevant measures to address and mitigate these distributional impacts?

2000 character(s) maximum

no comment for now

Which roles can the Commission, Member States, social partners, industry, trade unions and other stakeholders play to master the transition in a just and socially fair way?

2000 character(s) maximum

now comment for now

3.5 Awareness raising and communication

Please read and reflect the issues and scenarios proposed in the **Section 3.5** of the Staff Working Document.

Where do you see the main challenges in terms of communication and transparency?

2000 character(s) maximum

Lack of accountability of the industry & decision makers will put the whole transition at risk, since citizens expect a delivery on the climate neutrality & the zero pollution targets of the EU. In this sense, open data to

enable tracking of progress & prompt action in case of missed targets will be key to ensure a meaningful transparency

What are the main target audiences? Which actors can help to achieve a more inclusive and fact-based debate?

2000 character(s) maximum

The downstream & upstream actors of the EII ecosystems shall be part of the efforts sharing in delivery of the EII “ecosystem” pathway. Yet there is little wording as to what concretely the downstream users of EII sectors will do e.g. the construction industry (steel/cement/chemicals), aerospace/automotive industry (steel /aluminium etc), farmers (fertiliser use, integrated crop management) so to share the efforts (& associated costs) of the transition. E.g. the automotive industry should for instance commit to purchase ‘green steel’ “green materials” & pay for the extra environmental premium of the related transition in the upstream supply chain. The construction sector also has an important role to play as to reducing demand on steel & cement. Actors in agriculture seem not involved in relation to reducing demand for fertilisers / pesticides etc which would reduce environmental footprint from some upstream EII (chemicals industry, fertilizers industry etc). It is not visible on whether those ecosystems / downstream end users of the EII have provided inputs.

We also see need to include more academia or other research bodies that are free from conflict of interests with the EII, also to bring other type of facts.

See more response to the pledge section (Q47)

The public should be made aware that the transition pathway & industry vision align on the continued use of fossil fuels in 2050. Policymaker pressure to change approach would then be clear & forthcoming to support a more ambitious approach.

Which specific actions could the Commission, Member States, the industry, social partners and other stakeholders take?

2000 character(s) maximum

The Commission should also proactively communicate at the regional level to make EU communities aware of what is at stake, particularly in those countries where the Green Deal has not been completely endorsed & where the EU could be used as scapegoat when the consequences of an unmanaged transition will arrive.

Improved effort sharing within the whole value chain that are connected to the EII (end users) so to identify substitute options (which looks beyond technological fixes) which will reduce the environmental impact of the EII ecosystem overall.

Would you have any examples or good practice tools to share?

2000 character(s) maximum

see possibly quoted resources / inputs made

3.6 Thematic stakeholder meetings and governance

Please read and reflect the issues and scenarios proposed in the **Section 3.6** of the Staff Working Document.

Where do you see need for additional consultation or cooperation on the EII transition pathway, besides what is foreseen within the established stakeholder groups and partnerships described in the SWD?

2000 character(s) maximum

Answer to Q 40 gives some hints.

On which areas should international cooperation focus?

2000 character(s) maximum

no comment for now

3.7 KPIs

Please read and reflect the issues and scenarios proposed in the **Section 3.7** of the Staff Working Document.

Which KPIs should be used to assess the progress towards our transition objectives from each of the Commission, Member States, the industry, social partners and other stakeholders?

2000 character(s) maximum

NOTE: The EEB sees very much value in the KPI section, unfortunately our comments do not fit within the 2K character limit and therefore allow us to elaborate those in a stand alone document (as attached)
[Proposals in yellow highlight are subject for further discussions and finetuning for which no EEB position is made at this stage]

The KPIs are a good starting point but they are just 'indicators' without performance rating, nor target settings and are un-specific as to expectations. It would be useful to integrate the KPIs developed under the 8th EAP (pool indicators) that are relevant to the EII ecosystem

The current KPIs are too relative, abstract/not absolute, and are diluted by economic payback as opposed to climate and pollution issues which are more relevant given the aim of this exercise.

The following considerations linked to the KPIs should be taken:

Purpose of the indicators:

1. Techniques preventing negative environmental and human health impact will always be taken at source instead of pollution reduction techniques;
2. Improved benchmarking and compliance promotion tools so to track efforts made in delivery are set, those shall be user friendly for the actors involved (full ecosystem chain)
3. Improved transparency on the pollution life-cycle and decision making processes is guaranteed (tracking

of progress and benchmarking is made possible).

4. Main objective by 2040: carry out Industrial activities in full compatibility with achieving environmental quality standards / acquis and the set 'zero pollution' goals, based on a new benchmarking approach set to lowest ratio of 'environmental impact of activities versus public good/service provided', this includes notably the proposal for 5 headline key performance indicators sub-objectives

See link here for standalone doc <https://docs.google.com/document/d/16TEJB8iwc7JvVJtFLy6kWNxIkISUaKS1AdLI7yZmnLY/edit?usp=sharing>

What are the data sources?

2000 character(s) maximum

EU environmental acquis, EU Green Deal, climate science (UNFCCC), WHO (for the air pollution standards) <https://www.who.int/news/item/22-09-2021-new-who-global-air-quality-guidelines-aim-to-save-millions-of-lives-from-air-pollution> , Due diligence Corporate Sustainability Reporting directive, 8th EAP work https://ec.europa.eu/environment/news/stakeholder-workshop-8th-eap-monitoring-framework-2021-09-21_en , Materials Economics <https://materialeconomics.com/publications/the-circular-economy-a-powerful-force-for-climate-mitigation-1> , Agora Industry https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021-06_IND_INT_GlobalSteel/A-EW_236_Global-Steel-at-a-Crossroads_WEB_V2.pdf , CEMBUREAU <https://cembureau.eu/library/reports/2050-carbon-neutrality-roadmap> CHEMSEC <https://marketplace.chemsec.org/>

4. Expression of interest in concrete pledges and commitments

Supporting actions towards and beyond the proposed scenarios would be needed. However, this could be achieved only through joint work and commitments. The objective of the transition pathway is to co-create actions and scenarios supported by specific commitments to working towards them. For this reason, the Commission is gathering expressions of interest from industry / associations / networks / administrations / other organisations to pledge their involvement, support and actions. Based on the expressions of interest submitted through this consultation, DG GROW will be in contact with the organisations in order to jointly define common pledges by December 2021/January 2022.

What concrete pledge your organisation would be interested to present or collaborate on, in order to support the transition pathway towards a more resilient, greener and innovative EII ecosystem?

2000 character(s) maximum

This is not a pledge from the EEB but would like to present some that are very relevant to driving for "greener" products.

For steel sector:

- More & more companies have signalled their intent to lower the carbon footprint of their products before 2030 by buying "green steel", Car companies have started this. The switch from conventional to "green steel" for car manufacturing comes at a relatively low cost. Green steel would eliminate roughly 19% of the life-cycle emissions of a battery-electric vehicle at low cost without the need for complex reengineering

(see figure 5 of the Agora report on commitment made so far by some care companies.

Source Agora Industry, Wuppertal Institute & Lund University (2021): Global Steel at a Crossroads. Why the global steel sector needs to invest in climate-neutral technologies in the 2020s https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021-06_IND_INT_GlobalSteel/A-EW_236_Global-Steel-at-a-Crossroads_WEB_V2.pdf

5. General comments

What other comments would you like to give?

2000 character(s) maximum

we submit a standalone document to the KPI attachment which is available here
<https://docs.google.com/document/d/16TEJB8iwc7JvVJtFLy6kWNxIkISUaKS1AdLI7yZmnLY/edit?usp=sharing>

The EEB support comments made by EEB members on this OPC and comments submitted by ECOS.

We thank the European Commission for initiating this important work and look forward to taking into account NGO input and suggestions.

Whom should we contact regarding your contribution and possible further involvement in the EII Transition Pathway process? We use this contact information when launching a Call for Interest for potential participants in the Stakeholder consultation workshops in October-December 2021.

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Background Documents

[SWD transition pathway EII](#)

Contact

[Contact Form](#)