

Public Consultation and Call for Evidence: EU climate target for 2040

Feedback Period: 31 March 2023 - 23 June 2023

The European Public Health Alliance (EPHA) strongly supports the Commission's interventions to mitigate against climate change and to protect Planetary Health. We see climate policies as one of the cornerstones of current health and public health policy in Europe, and as such, we see great opportunities for climate mitigation and health co-benefits through ambitious, stringent, dedicated and health-focused policy in the EU.

We see the following themes as priorities when planning the 2040 EU Climate Targets. These are based on current and predicted public health issues, and the proposed trajectory of policy, science, technology and success to date.

EPHA five priorities are:

- 1. Ambitious reduction in emissions**
- 2. Protection of those most vulnerable**
- 3. Focus on health and health co-benefits**
- 4. Transformation and decarbonisation of energy, transport, urban and food systems**
- 5. Securing finances and implementation**

Priority 1: ambitious reduction in emissions

The key, overarching principle that needs to guide all policies, in the European Green Deal, and also outside of it, is that carbon dioxide emissions need to be reduced rapidly, deeply and for the long term. The latest IPCC report strongly advises that cuts to emission happen immediately¹. The current economic system that places precedent on continuous growth and profit over environmental protection and health needs to be reformed as to promote Planetary Health, on which humanity relies.

In addition to rapid decarbonisation and emissions reduction, strong accountability frameworks, social participation, and political commitment, irrespective of the targets, should be a policy priority.

Climate change continues at an increasing pace, and many countries, including European Union Members States, are missing their climate targets. Related, the Sustainable Development Goals (SDGs) are also off-target to be achieved by 2030. Reconciling and rectifying these missed targets should be considering during the development of 2040 climate targets, and the goals of the SDGs should be considered when aiming for these goals, including climate financing, pricing redistribution, health and access to clean energy² (see below also).

While the EU is looking into technologies that are in development and are being marketed as having the potential to remedy some of the effect of climate change, such as hydrogen and carbon capture technology, these have disputed health and climate benefits, and should be reserved for sectors that are particularly challenging to decarbonise. Furthermore, the yet unfulfilled promise of these technologies should not be used to stand in the way of large-scale system transformation that needs to occur urgently.

It should be noted also that outside of the effects on climate change mitigation, cleaner systems will have many health co-benefits (see below).

The involvement of diverse stakeholders, including CSOs, should be part of the decision making in climate policies, as recommended by the UNFCCC Secretariat: *“international public agencies, and opening up the intergovernmental process for the initiatives of subnational governments, civil society organizations and private companies in order to push the global response to pressing trans boundary challenges forward”*³. CSOs have a particular, informal and exclusive role to play in policymaking, as has been seen in the development of the SDGs⁴.

The EU-US agreement signed in 2021 makes reference to becoming net zero greenhouse gases (GHG) economies no later than 2050 and also stated that a US-EU High level Climate Action Group is established. It is not clear what the work is of this action group, and if CSOs are sitting on the table, EPHA would like to request more clearly integration of European CSOs being able to dialogue in this taskforce. EPHA recommends that the Commission should set up a Working Group or Task Force with CSO and Member States, which could serve as a mechanism for developing a national compass tracking on climate change and could serve as a tool to allow European CSO and national stakeholders to jointly-assess their country’s needs, strengths and facilitate translation to national target setting.

Recommendations:

- 1. Immediate, rapid, deep, long-term reductions in emissions to mitigate climate change, even above what is already set out in the EU Green Deal.**
- 2. Strong accountability frameworks, social participation, and political commitment.**
- 3. Current missed targets should be reconciled with increased action.**
- 4. The guiding principles of the global Sustainable Development Goals should be integrated to ensure equity and justice.**
- 5. Integration of European CSOs in the US-EU High-Level Climate Action Group dialogue.**
- 6. Working Group or Task Force of CSOs and Member States to facilitate national target setting and overall direction.**

Priority 2: protection of the most vulnerable

EPHA firmly believes that those most vulnerable to the effects of climate change should be a priority in providing a just transition. This includes in terms of engagement; marginalised populations should have a particularly strong voice in terms of shaping responses to climate change. Disadvantaged groups suffer disproportionately from adverse effects of climate change, causing larger inequalities⁵.

Climate change will cause even further deepening health inequalities, especially among those who contribute the least to its causes⁶. The 2040 climate goals should focus on the most marginalised, ensuring the burden of disease is reduced and their access to healthcare is not jeopardised. Specific attention should be paid to Europe’s most marginalised groups, such as the Roma whose vulnerable situation means they are less equipped to deal with the effects of climate change, while also facing disproportionate negative effects. Research shows, for example, that, especially in Eastern Europe, Roma people are more vulnerable to the impacts of climate change due to evictions and invisibilisation of their conditions, which causes a higher vulnerability to extreme weather events⁷.

Environmental Justice should be a key concern for the development of 2040 climate goals, to counter disproportionate effects of climate change on disadvantaged groups. Environmental justice *“relates*

to how certain communities and groups, including people of colour, ethnic minorities, indigenous groups or low-income groups, are disproportionately affected by environmental burdens, have less access to environmental resources and services, and/or are discriminated against in their right to information, to participation in decision-making and to access to justice in environmental matters. Environmental injustices are regularly associated with health risks and negative consequences for wellbeing⁸." EPHA's Roma Health Network concludes in a 2022 policy paper that environmental health and environmental justice are currently not receiving sufficient attention in the context of the EU Roma Strategic Framework⁹.

Outside of Europe, the European regional community also stands to suffer greatly due to climate change. The wellbeing of the European region should be a key concern of the European Union, as should the protection of health of this region, for both reasons of justice, as well as stability. The European Union should heavily collaborate to ensure that the European region is able to mitigate and adapt to the challenges of climate change, including through funding (see below).

Further afield, low-income countries faces a significant threat from climate change, despite having contributed the least. Emissions per capita are some of the lowest globally in countries incredibly vulnerable to climate change, such as some in Sub-Saharan Africa and the Pacific. Efforts are underway to provide a protection fund for such regions; Europe should wholeheartedly back this ambition and treat threats to low-income countries with urgency and commitment, with an aim to preserve health, function and stability. This includes through heavy financing, but also through respectful, mutual collaboration. There is a north-south imbalance in NGOs participation in global climate governance¹⁰.

Recommendations:

- 7. Climate goals should focus on the most marginalised and disadvantaged and should prioritise engagement with marginalised populations.**
- 8. Environmental Justice should be a key guiding principle and concern for development of the 2040 climate goals.**
- 9. The European region should be considered, collaborated with, and aided in mitigation and adaption of climate change. Low-income countries should be collaborated with, including through heavy financing, to protect, among other factors, health, in regards to climate change mitigation and adaption.**

Priority 3: focus on health and health co-benefits

Planetary Health is a concept that realises the intimate relationship between human, animal and environmental health. Realising these interlinkages, the health of humanity cannot be separated from the health of the planet. Planetary Health sees that factors that lead to environmental degradation, such as pollution, overfarming, chemical contamination, deforestation and unsustainable development, all have an effect on human health. This approach mobilises multiple sectors, disciplines and communities at varying levels of society to work together to foster well-being and tackle threats to health and ecosystems, while addressing the collective need for clean water, energy and air, safe and nutritious food, taking action on climate change, and contributing to sustainable development. Improving environmental markers of Planetary Health stands to improve human health.

Climate change mitigation will increase Planetary Health, but also because of the interlinkages of complex climate and planetary health systems, action to protect against the health impact of climate change will also see co-benefits in other health parameters. Improvements in decarbonisation of transport systems stands to positively impact air quality and health harm. Nature-based solutions can foster biodiversity and ecosystems, while also protecting against extreme weather events. Action to use land resources more sustainable can reduce the risk of zoonotic disease spillover. Improvements in agricultural practices can improve animal health and decreased the burden of antimicrobial resistance (AMR), as will reductions in environmental contamination, including from wastewater and solid waste.

Infectious diseases, including AMR itself and diseases related to AMR, stand to pose a serious threat in the coming decades, independently of climate change, but also linked to climate change. More EU legislation, regulations and policy guidance is needed to accelerate action to reduce environmental releases of AMR relevant pollutants. EPHA would also recommend linking existing targets from the SDGs¹¹. Also, EPHA's AMR Stakeholder network last year published best practice guidelines for AMR¹². These best practices can provide the space for a fruitful dialogue within political partners, considering different models of integrative medicine to prevent the misuse of antibiotics. They provide a pathway for prevention but also for building resilience in the population.

The health sector can have a leading role in promotion change. Health is a strong selling point in policy, and healthcare professionals are some of the most trusted professions in Europe when surveyed. Promoting a leadership role for health and healthcare in facing the challenge of climate change can increase general support and momentum to set ambitious targets and reform systems.

Technically, this should include a focus on decarbonisation of the health sector, as endorsed by the WHO. Healthcare incurs a carbon footprint of approximately 5% of global emissions and an integrated approach using digital technologies and platforms to improve health care outcomes has emerged as a key tool to reduce impact¹³. Telemedicine has been shown to reduce carbon footprint, and this is a field that could be support and upscaled to decrease emissions¹⁴. Decarbonisation of the health sector will signal other sectors to follow, as well as show leadership and the seriousness of the health threat in relation to climate change. Support, innovation and finances will be needed for this.

Recommendations:

- 10. Climate change targets should specifically take into account health and health co-benefits across a number of areas, including:**
 - a. Antimicrobial resistance**
 - b. Air pollution**
 - c. Environmental pollution and contamination**
 - d. Waste management**
- 11. Targets should be part of a just transition, such as the current pressures of energy poverty seen in Europe.**
- 12. The healthcare sector, and healthcare professionals, should be encouraged to be vocal leaders to achieve widespread policy support for ambitious, health-focused change, including decarbonisation of the health sector.**

Priority 4: system transformation and decarbonisation

Reforming the current systems that heavily rely on fossil fuel in Europe is essential. This is starting but needs to be rapidly upscaled. Unified policies, with health in mind, can help to reform these systems and reform Europe's emissions profile. Health co-benefits from cleaner systems using energy will occur in multiple ways and should be factored in when making ambitious policy.

The way we currently produce energy is unsustainable and unhealthy. Though renewable energy is growing in Europe, ongoing investment in fossil fuels, including re-opening coal-fired power plants and reliance on gas are not only perpetuating climate change, but are also causing health impacts, and heavily affecting the most marginalised. Energy poverty has become a major issue in Europe over last winter, and this is a Social Determinant of Health that affects the ability of people to live lives in health. Energy poverty, which requires prompt action with a long-term vision, purposefully avoiding pathways that would lock certain population groups into polluting and health-damaging technologies.

It goes without saying that energy in Europe should be renewable.

Outside of this though, with marginalised populations in mind, the 2040 targets should focus on decarbonising home heating and cooking, as this aids climate goals, but also has health co-benefits. Residential heating and cooking with fossil fuels and biomass has a health and social cost of EUR 27 billion per year, mediated through air pollution¹⁵. Poor housing, including those that aren't energy efficient, is a risk factor for poor health and has a significant health cost in Europe¹⁶. Energy efficient renovations, especially with the most marginalised in mind, can have significant impacts on energy poverty, and health and wellbeing, while decarbonising¹⁷.

Decarbonising indoor cooking also stands to benefit climate and public health. Switching from gas-based cooking will reduce the burden of poor air quality in European homes, as well as decreasing release of Short Lived Climate Forces, such as nitrogen dioxide and methane. The health burden of gas cooking in Europe is profound, and switching could prevent up to 700,000 cases of childhood asthma symptoms in Europe alone¹⁸.

Transportation exerts a large carbon footprint in Europe, and systems change could greatly benefit health. This is known to the European Commission, with multiple policies in place and in development to reap these climate and health co-benefits, such as the Ten-T Framework, the Ambient Air Quality Directive and the Euro 7 Emissions Standards. These should be high ambition, and a user-friendly, efficient, affordable and clean transport system in Europe should be pushed for ambitiously. Europe has the potential to lead the world in this.

Significant public health gains are seen when active mobility is used, such as walking and cycling. Urban areas stand to see great benefits from switching from private motorised transport for mobility. Sustainable Urban Mobility Plans (SUMP) compliment active mobility, and should be rolled out across Europe. To incentivise these plans, and make sure that these plans have health and usability in mind, EPHA proposes that funding be tied to achieving health goals related to sustainable urban mobility, including both active and public transport.

Finally, and crucially, European food systems need to be properly addressed to limit climate impact, and ensure food security. Rethinking and reshaping the way stakeholders engage with the food system, from the farm to the fork, is a necessary step towards climate neutrality. The Intergovernmental Panel on Climate Change (IPCC) Special Report on Climate Change and Land (2019) reports a range from 10.8 and 19.1 billion tonnes of CO₂-equivalent (CO₂e) emissions per year. From the initial phase of the supply chain (land use) to the latest of the demand (post-retail,

how consumers prepare food in their house, how much food is wasted), the food chain is a major contributor to climate change.

This fact is not unknown by the European institutions. The European Commission (EC) is expected to launch in September 2023 the proposal for a Framework on Sustainable Food Systems (FSFS), as the flagship of the Farm to Fork Strategy (F2F) and the Green Deal (GD). The Framework will accelerate the green transition towards a more sustainable engagement with food within the whole chain. Moreover, it is supposed to bring internal coherence for the numerous European policies and legislations tackling food, with high expectations regarding the Common Agriculture Policy (CAP) and the Common Fisheries Policy (CFP), as well as ensuring that every policy integrates sustainability as a key objective. Another piece of legislations strive in the same direction: The Sustainable Use of Pesticides Directive (SUR), the Food Waste Reduction Targets, and the Sustainable Food Labelling Framework, among others.

Any serious attempt to drive the European Union towards climate neutrality must include a deep transformation of the food and agriculture systems. This transformation must come from both the institutional powers (European and National executives), and the producers (including retailers and marketers). Relying only in consumers' responsibility and rationality to make sustainable choices has been proven ineffective. We need to shift the approach from the individual to the context, and create enabling food environments where the sustainable (and healthy) choices are the easiest, the most accessible and the most affordable.

Recommendations:

- 13. Energy efficiency upgrades for the housing stock in Europe, with a particular focus on the most marginalised, will have climate and health co-benefits, and should be an urgent priority.**
- 14. Decarbonising cooking should be prioritised.**
- 15. European transport systems should be decarbonised, as well as being user-friendly and efficient. These should have a strong reliance on active mobility where possible, and urban areas should institute Sustainable Urban Mobility Plans (SUMP). Funding should be tied to achieving health outcomes.**
- 16. The food and agriculture systems, from the farm (supply) to the fork (demand) must be addressed in order to achieve climate neutrality by 2050. The European Commission at this stage, and the European Parliament as well as the Council of the European Union, must thrive for an ambitious and comprehensive Framework for Sustainable Food System.**
- 17. Food environments should be a cornerstone set of policies that shape how we produce and consume food. The sustainable (and healthy) food choice should be the easiest, the most accessible and the most affordable.**

Priority 5: securing finances and implementation

For the scale of response needed to face climate change, funding should be provided rapidly and at scale. Policies should focus on setting the necessary budget to achieve targets. The EU's emissions budgets are small and shrinking rapidly; furthermore the 2030 target of GHG reduction is insufficient¹⁹. This needs to be increased, and the Multiannual Financial Framework should play a role in this²⁰.

The EU has a powerful role to play, both within Europe, and in low-income countries. Inside of Europe. Inside of Europe, through policy, the EU should utilise financing instruments to leverage change and improve resilience of health infrastructure and institutions through increased implementation of sustainable climate adaptation actions, such as nature-based solutions²¹.

Outside of the EU, EU funds and investment should be targeted at low-income countries, providing climate justice for these countries to allow a cleaner transition that will stand to benefit the EU and countries outside of the EU²². Official Development Assistance (ODA) targets with clear climate alignment should be established for support to third countries.

There is a current implementation gap on the Paris Agreement and 2030 climate goals, and some countries also show an ambition gap on shaping pathways towards well below 2 degrees. There is a need to speed up implementation, and of a redesign of policy mixes, towards more coherent policies including economy-wide financial instruments. This requires dedicated budget and should also include international cooperation²³.

Recommendations:

- 18. EU funds should be made available rapidly and at scale to meet the complexity, size and severity of the climate challenge. Funds are currently insufficient. Budget should be dedicated to the implementation gap that faces climate financing.**
- 19. The EU should utilise financing instruments to leverage change and improve resilience of infrastructure and institutions, mediated through EU policy.**
- 20. The EU should support climate ambition in low-income countries and see the threat to these countries is the same threat as domestic to within the EU. Official Development Assistance targets should have a clear climate alignment.**

Evidence for Consideration

¹ IPCC (2023). AR6 Synthesis Report: Climate Change 2023. IPCC. <https://www.ipcc.ch/report/sixth-assessment-report-cycle/>

² Soergel, B. et al. A sustainable development pathway for climate action within the UN 2030 Agenda. Nature. <https://www.nature.com/articles/s41558-021-01098-3#citeas>

³ Hickmann, T. et al. (2021). The United Nations Framework Convention on Climate Change Secretariat as an orchestrator in global climate policymaking. International Review of Administrative Sciences. <https://journals.sagepub.com/doi/pdf/10.1177/0020852319840425>

⁴ S nit, C. et al. (2020). Leaving no one behind? The influence of civil society participation on the Sustainable Development Goals. Environment and Planning C: Politics and Space. <https://journals.sagepub.com/doi/pdf/10.1177/2399654419884330>

⁵ Islam, S. N. (2017). Climate Change and Social Inequality. UN Secretariat. https://www.un.org/esa/desa/papers/2017/wp152_2017.pdf#page=4

⁶ World Health Organization. Climate change and health. <https://www.who.int/news-room/factsheets/detail/climate-change-and-health>

⁷ Alexandrescu, F. et al. (2021). On the path of evictions and invisibilization: Poor Roma facing climate vulnerability. *Cities* 114. <https://www.sciencedirect.com/science/article/abs/pii/S0264275121000998>

⁸ Heidegger, P. and Wiese, K. (2020). Pushed to the wastelands: Environmental racism against Roma communities in Central and Eastern Europe. European Environmental Bureau. <https://eeb.org/wp-content/uploads/2020/04/Pushed-to-the-Wastelands.pdf#page=7>

⁹ European Public Health Alliance. (2022). Roma Health and Housing: Filling in the Gaps — A Policy Paper by the Roma Health Network. EPHA. <https://epha.org/wp-content/uploads/2022/10/roma-housing-and-health--rhn2022.pdf#page=19>

¹⁰ Gereke, M. et al. (2019). Unpacking the unequal representation of Northern and Southern NGOs in international climate change politics. *Third World Quarterly*. <https://www.tandfonline.com/doi/abs/10.1080/01436597.2019.1596023?journalCode=ctwq20>

¹¹ World Health Organization. WHO Regional Roadmap on AMR for Europe, 2023-2030. <https://apps.who.int/iris/bitstream/handle/10665/361889/72id05e-AntimicrobialRes-220571.pdf?sequence=1&isAllowed=y>

¹² AMR Stakeholder Network. (2022). Call for Good Practices. EPHA. <https://epha.org/report-good-practices-to-tackle-antimicrobial-resistance/>

¹³ Lenzen, M. et al. (2020). The environmental footprint of health care: a global assessment. *The Lancet*. [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30121-2/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30121-2/fulltext)

¹⁴ Purohit, A. Does telemedicine reduce the carbon footprint of healthcare? A systematic review. *Future Healthcare Journal*. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8004323/>

¹⁵ EPHA. (2022). The Impact of Residential Heating and Cooking on Air Quality in Europe. EPHA. <https://epha.org/wp-content/uploads/2022/03/epha-position-paper-clean-heating.pdf>

¹⁶ Garrett, H. et al. (2021). The cost of poor housing in England. BRE. https://files.bregroup.com/research/BRE_Report_the_cost_of_poor_housing_2021.pdf?_its=JTdCJTlydmlkJTlyJTlYNDNkZmRjNmMtMWQ5Ny00MDYwLWlONzAtMWY0YWE1Y2Y2ZWUzJTlyJTJDJTlyc3RhdGUIMjllM0EIMjYbHR%2BMTY4MzA0MTE3NX5sYW5kfjJfNzc4NzNfc2VvXzNmMDJkNzkONWQzNmlyNThjYzk5OWI2ODEzNWVIMTEwJTlyJTJDJTlyc2l0ZUlkJTlyJTlYJTNBOTgwMCU3RA%3D%3D

¹⁷ HSE. (2022). Rapid report on energy poverty for the HSE EMT from the Area Director of Public Health Leadership Group (ADPHLG). HSE. <http://hdl.handle.net/10147/634784>

¹⁸ Blair, H. et al. (2023). Exposing the Hidden Health Impacts of Cooking with Gas. CLASP and EPHA. <https://www.clasp.ngo/wp-content/uploads/2023/01/Gas-Report.pdf>

¹⁹ Meyer-Ohlendorf, N. et al. (2018). EU Greenhouse Gas Emission Budget: Implications for EU Climate Policies. Ecologic Institute. https://www.ecologic.eu/sites/default/files/publication/2018/2120_eu_emission_budgets_ecologic

[report-final2018.pdf](#)

²⁰ Runkel, M. et al. (2019). Climate change and the EU budget 2021-2027. BMU and EUKI. https://foes.de/pdf/2019_MFF-and-Climate_background-report.pdf

²¹ Davis, M. et al. (2022). Opportunities for health engagement in European climate policies. Ecologic Institute. <https://epha.org/wp-content/uploads/2023/04/epha-climatehealth-scopingstudy.pdf>

²² Di Ciommo, M. et al. (2021). The EU budget and external climate financing. ECDPM. <https://euagenda.eu/upload/publications/eu-budget-external-climate-fnancing-state-play-ecdpm-briefing-note-132-2021.pdf>

²³ Roelfsema, M. et al. Taking stock of national climate policies to evaluate implementation of the Paris Agreement. Nature. <https://www.nature.com/articles/s41467-020-15414-6.pdf>