

Mr Pieter van Geel
President of the EU "Environment" Council
State Secretary for the Environment
Ministry of the Environment
PO Box 30945
NL – 2500 GX The Hague
The Netherlands

30 September 2004

THE SECRETARY GENERAL

Dear President,

**Re: "Environment" Council on 14 October 2004
10th Conference of the Parties to the UNFCCC**

UNICE supports combating climate change via an international process through the United Nations Framework Convention on Climate Change (UNFCCC). We believe that it is vital to use the context of COP-10 in Buenos Aires to develop a process that will lead to post-2012 negotiations involving all countries and regions. Through such a process, long-term aspirations for strategies to combat climate change must be developed on a global basis in particular including all countries that are major emitters, as no one country or region has the ability to reduce emissions to the levels discussed in the IPCC third Assessment Report, without the full cooperation of all countries.

Defining the ultimate objective of preventing dangerous anthropogenic interference with the global climate is a largely political decision that should be determined through an international process taking into account the views of all countries and regions that will contribute to attaining this objective. Whilst the EU has a major role to play in bringing about such a political decision, it should not be seen as implying that its own view on the subject is definitive and that it expects other countries to accept this and follow. Political negotiation is essential to ensure the development of a truly comprehensive, international agreement involving all countries and regions that will work to combat climate change.

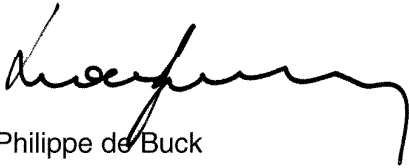
The EU 2005 Spring European Council will consider medium- and long-term emission reduction strategies, including targets. Such considerations must:

- include a thorough analysis of what can be achieved politically at international level;
- entail full cost-benefit analyses, as have been requested from the Commission, that take into account the impacts of both current and future EU climate change strategies, and the large number of EU instruments aimed at reducing emissions of greenhouse gases, on the competitiveness and sustainable future of EU business;
- and be framed in the context of a comprehensive global agreement involving all countries and regions.

At the current stage of international negotiations, UNICE believes that it is not appropriate for the EU to commit itself to further definitive targets in the knowledge that its main trading partners, in both developed and developing countries, are unlikely to adopt comparable regimes. Such actions could potentially lead to further outsourcing of industrial activities outside of Europe, acting against both economic and environmental considerations.

Industry within the EU has made significant reductions in its emissions of greenhouse gases. The research, development and dissemination of new and existing technologies are part of the solution to climate change, as well as mechanisms giving companies flexibility in their choice of strategies for tackling climate change. These activities can only be carried out by competitive and profitable companies. We look forward to continuing our dialogue with you on the post-2012 climate change regime framed in the context of the Lisbon objectives and the global dimension, as well as securing a sustainable future for business within Europe.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philippe de Buck', with a long, sweeping horizontal stroke extending to the right.

Philippe de Buck