



Cleantech mobility solutions: assessing and choosing?

Minutes of the 6th session, March 23, 2010

Goals of the Session

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This is the sixth session of these public hearings designed to study how companies and authorities in the United States deal with mobility in relation to climate change. To carry this out, we will have to take a step back from traditional representations of mobility.

In the United States, mobility has played a significant role in its economic development and in its history. We will study the different approaches to mobility taken by private companies and the different initiatives that have been adopted in a society where the free market is extremely important. We have invited American experts to answer a number of specific questions we have raised.

The panel includes European specialists from different disciplines. Edwin Zaccaï, Director of the Centre of Studies on Sustainable Development at the Free University of Brussels (ULB), will lead the debate. We also welcome to our panel Jean-Pierre Orfeuill, Professor at the Urban Institute in Paris; Thomas Lagier, in charge of integrated territorial approaches at Veolia Environment Research; Benoît Lefèvre, in charge of urban questions at the Institute of Sustainable Development and International Relations

(IDDRI); Michel Micheau, in charge of the cycle on Urbanism at the Paris School of Political Sciences; and Vincent Kaufmann, specialist in the sociology of mobility and professor at Lausanne University.

This is an opportunity for us to study different issues and identify areas of further research and future debates. The aim is to see what is happening in the rest of the world, particularly in the United States (http://www.ville-en-mouvement.com/cleantech_en/).

Assessment: Context

Our focus today will be on assessment. In the past few decades, the United States has had to prove that public assets are well managed and efficient. Climate change has renewed interest in public evaluations. We would like to examine such public efforts to manage climate change in the context of mobility.

In the private sector the collapse of different assessment bodies, such as the financial rating agencies, has brought about a mistrust of official evaluations. We have to bring proof that the efforts made by public bodies meet the expectations of the public and respond to environmental announcements. Is the climate change transforming the approach of assessing in the US public bodies and private firms?

We are here to see how questions of assessment are dealt with in the United States, by both public authorities and private enterprise. That is why we have invited Mark Wilson, who has given us the honor of participating in our discussion. He has been a principle counsel on energy to American senators and is presently the main Counsel to the International Emission Trading Association (IETA: www.ieta.org), which brings together numerous companies to discuss a common trading market in emissions within an international legal framework.

We are also pleased to welcome Benoît Lefèvre. He has been researcher invited at Berkeley University during the last year, working on the Transportation and Climate Change Standards, particularly in California. He will introduce the second part of the Session, which is focused on the evaluation of public measures by States.

Framework of the Session

Edwin Zaccai

Director, Sustainable Development Research Center, Free University of Brussels (ULB)

The approach of this session is to assess the impact of the changes that have taken place with regard to climate change and energy. Our aim is also to see what can be done in France and in the rest of Europe. Our panelists have a good deal of expertise and can remind us about the current legislative contexts on climate policy in the United States and about corporate strategies to reduce their greenhouse gas emissions.

We will have tangible examples that will help us seek answers to the following broad groups of questions:

- Questions 1: What is being assessed?
- Questions 2: Who does the evaluating?
- Questions 3: How are the mobility choices assessed in relation to climate change?
- Questions 4: Why assessing and how are the assessments used?

In this first part of the session, we can discuss:

- Whether the way by which emissions are evaluated has changed significantly in the United States;
- The financial and economic issues at stake for companies in relation to evaluations;
- The limits of evaluations.

Part I: Climate and Transportation Policy in the United States

Mark Wilson

Counsel, International Emissions Trading Association (IETA), San Francisco

The International Emissions Trading Association is a diverse organization made up of power companies, oil and gas companies, utilities, and offset providers, as well as of consulting firms and law firms. The ideas I shall express do not necessarily reflect any of our members' views.

I. Historical Context

A real evolution has taken place in the past eight years of US policy. The government may finally be adopting some form of regulation for climate. At the same time, it plans to adopt complementary transportation policies.

Since the time of Franklin D. Roosevelt, US transportation policy has been entirely based on building highways and building them well. Clearly, that policy is going to change. However, no one knows *how* it is going to change.

Washington D.C. has been completely overtaken by the health care debate. President Obama had indicated that passing some form of climate and energy legislation was his third priority, after health care and a financial overhaul. Now that health care has become law, the door has opened to the possibility of President Obama working on climate change.

President Obama has repeatedly referred to setting a price on carbon.

II. State Policies

U.S. climate change policy involves two players, State and Federal. In the States, a few main regional programs, mostly voluntary, have been set up. The Regional Greenhouse Gas Initiative in the North-East States relates only to the power sector. The Midwest Cap-and-Trade Accord is made up of progressive State governors attempting to get some sort of policy together but hoping to get pre-empted by a Federal program.

In California, a mandatory program, "AB 32", mandates a statewide cap-and-trade program that covers oil and gas issues in the transportation sector. An importer or exporter of gasoline is required to submit an allowance for every ton it burns. The California government has just released a preliminary draft regulation in its attempt to complement its present State program of low-carbon fuel standard. The power sector and the oil and gas industries have been pushing these measures back, not wishing to have dual regulations of energy efficiency standards and pollution standards.

The State Level also involves Metropolitan Planning Organizations (MPOs), that have initiated programs such as High Occupancy Vehicle (HOV) Lanes, Vehicle Miles Travelled (VMT) for gasoline taxes, and Holistic Planning.

III. At the Federal Level

1. Action in Congress

The economy-wide Waxman-Markey Climate Bill, passed in the House of Representatives, provides cap-and-trade for both the power and the oil and gas sectors. In the meantime, the Senate is drafting an economy-wide Cap-and-Trade Climate Bill, the Kerry-Graham-Lieberman Bill, which provides cap-and-trade for stationary sources but a carbon tax for the oil and gas sectors. If the Senate bill should pass, the two bills together will go through a reconciliation process and will then get sent to the President. It may be a real uphill battle to get enough votes in the US Senate to get a bill on President Obama's desk.

Another US transportation bill is "Safetea-Lu". It provides funding to individual States on highways. It includes proposals for transit going away from the highway model as well as providing funds to local planning organizations to incorporate inter-modal transport and climate change.

2. Action in the Obama Administration

a. The Environmental Protection Agency

The EPA, being the US Federal agency for the environment, deals with transportation issues in three ways:

1. It regulates tailpipe emissions from cars by means of a process referred to as the "Clean Air Waiver".
2. A Renewable Fuel Standard (RFS) requires approximately 25% of renewal fuel production from oil manufacturers by 2020.
3. The EPA is drafting regulations for major stationary sources of greenhouse gas emissions.

The Obama Administration has directed the EPA to move ahead, as an effort to reduce greenhouse gas emissions, but also in order to put more pressure on the Senate and the House of Representatives to pass legislation.

b. The Department of Agriculture

This Department provides grants and assistance for greenhouse gas offsets and renewable fuels.

c. The Department of Transportation

This Department has initiated the CAFE Standards, or Corporate Average Fuel Economy Standards, dictating that automobile manufacturers have to increase the fuel efficiency of their entire fleet by about 25% over the next ten years.

Part I: Debate

Edwin Zaccai

First, could you give more details about Cleantech and efficiency in cars? Second, do you think some of the companies in IETA who are active in both Europe and the U.S. might have a different attitude toward what is going on?

Mark Wilson

I did not speak much about Cleantech, because U.S. policy is much more about goal setting than about specific technologies. Many companies set up to cash in on goals. Most Cleantech solutions result from submitting to qualifications for grant money or in offsets to become more fuel efficient.

To answer your second question, it is certain that some companies wear two hats and take contradictory positions in the U.S. and in Europe. At the same time, many companies speak from both sides of their mouths even within the U.S.

Thomas Lagier

How does the three-fold relationship work between the Federal government, the States, and corporations in fostering innovation and technical solutions? How are economic constraints taken into account when dealing with assessment? What bodies bring together the lessons learned in these three different sectors?

Mark Wilson

A lot of stakeholder meetings are going on at the present time in Washington creating a dialog between legislators and corporations. The Kerry-Graham-Lieberman draft bill is the legislative vehicle being used. The Senators and their staffs are bringing in individual companies and are listening to their concerns in order to draft a final bill. Our organization also had a day with them as did individual companies. One debate is over the amount of free allowances companies are going to get. Another question is around how much of the auction revenues are going to be diverted.

The relationship between all the stakeholders – federal, state, local, and corporate – is very powerful. An enormous amount of influence is used to move the dialog. Simultaneously, an unofficial dialog

takes place based on market factors. It is possible to assess how well the dialog works by observing how much the bill changes from the way it is in the House to the way it is in the Senate.

Jean-Pierre Orfeuil

To help us understand the U.S. approach to goal-setting, could you tell us more about CAFE Standards? Why are they set at 35 miles per gallon?

Could you give more details on the Renewable Fuels Standard? Also, how do you get to a compromise between different stakeholders? Why are some things on the agenda and not others?

We thank you for your research on feebates because we adapted it France with a bonus-malus system that has been a great success.

Last, in a goal-setting approach, what happens when goals are not achieved in CAFE Standards?

Mark Wilson

With CAFE Standards, if goals are not achieved, ideally the company would get a heavy fine. However, any company not meeting CAFE standards can appeal claiming that economic hardship prevented it from meeting the Standards. The fine is then reprieved. The U.S. has a long history of goal setting. If the goals are not met, usually nothing really happens.

On rebates: The energy efficiency sections in the upcoming Climate and Energy Bill provide rebates, not only on more efficient cars, but also on washing machines and electrical appliances. Tax rebates do not work well in the U.S. due to the tax structure. Americans prefer cash in hand.

The Cash-for-Clunkers program gave anyone who traded in an old car for a more fuel-efficient received, \$4 000. It caught on like wildfire.

To answer your question about how we arrive at standards: When the Senate is working on a bill, a staff will start meeting with the stakeholders. For the Renewable Fuel Standard, the Farmers' Unions, Cleantech investors, and large corporations all come to the table. The staff tries to set the highest it can. Stakeholders will look after their own interests and will start knocking the goals down. A Standard is the result of long and complex interactions.

Benoît Lefèvre

It was difficult for President Obama to get the Health Care system adopted. How long will it take him to do the same thing for a Climate Change bill?

Also, will he be able to develop a cap-and-trade or a Climate system to get to Mexico with something consistent? Last, if there is a cap-and-trade system, how will it work with regional cap-and-trade systems?

Mark Wilson

The regional programs will almost certainly be pre-empted.

There is very little chance that a climate bill will be enacted this year. I expect that we will go to Cancun with nothing happening. The Obama Administration will continue to regulate greenhouse gases through the EPA. That will be a nightmare. This is not ideal because the EPA can not incorporate cost-saving measures such as offsets within the Clean Air Act. The EPA has already stated that it will start regulating gases in 2011, but only for stationary sources. All industries will start screaming, because they hate submitting permits to the EPA. That will put pressures on Congress to enact something that takes the pressure off the EPA.

Mireille Apel-Muller

What are the financial means invested by companies in the U.S., in France, and in Europe? It seems that companies are selling green products with integrated evaluation systems. The public has had to step in. It seems that we are negotiating different objectives, but we are not negotiating the different ways of assessing these aims.

Mark Wilson

The problem is that there is very little to assess in the U.S. Until there is a system in place, our companies are not doing anything. They do not wish to put capital investments into what may not be regulated. The only assessments going on are those done by the EPA and by consumer reports assessing fuel efficiency for sales of hybrid cars.

Edwin Zaccai

In Europe, there are targets set by countries. There are several ways of assessing them. As Mark said, we have to set targets based on what we assess. At the European Community level, it is important to assess the cost of CO₂ abatement and to set targets accordingly. Assessment is carried out to determine what is going to be included. Targets are negotiated at the same time as the features to be included in the evaluation system.

From the floor

Have cities in the U.S. taken initiatives on transportation? Are cities linked to State and Federal climate policies? Are cities important players in the climate dialog?

Mark Wilson

Major cities are certainly important players in terms of the impact of climate change on them. Most cities are not incorporating climate change into city planning. However, there has been a resurgence of light rail and high-speed interconnective rail between cities. Up to now, the move was toward urban sprawl. Nowadays, people are coming back to the cities. Inter-city transport is based on profit. The fact that it reduces greenhouse gas is a nice afterthought.

The U.S. Transport Department has initiated the “TIGER Grant” program, which provides funds to city transit authorities for greenhouse gas reduction transportation projects.

Taufik Souami

I am surprised that there is not much debate within IETA about precise evaluation systems. Some companies have made announcements recently that they are reducing greenhouse gas emissions. Do we need to distinguish companies in the energy sector from those who are not? Why does IETA not mention what is being done by other companies?

Mark Wilson

IETA has third-party verifiers who look at companies’ portfolios and find ways of helping them reduce greenhouse gases. In the U.S., companies are given allowances based on their historic emission levels. These proposed programs would go into effect in 2012. Companies therefore want to wait until they can get their allowances before they reduce their emissions.

Taufik Souami

CO2 reporting is quite technical, but it helps put in line a whole technique of assessment.

Mark Wilson

Starting this year, there will be mandatory registering for large stationary sources. They will have to report their emissions to the EPA. That is the first step toward cap-and-trade. Those emissions do not have to be third-party verified.

Taufik Souami

I would like to conclude by mentioning the perverse effects of the captured markets, in which some companies have no interest in reducing their emissions at the present time so that they can have a high level of emissions as a starting point.

Part II: Evaluation of Public Measures by States

To What Extent is Climate Change Taken Into Account in Californian Mobility Policies?

Benoît Lefèvre

City Planning Specialist,

Institute of Sustainable Development and International Relations (IDDRI)

I work at IDDRI, a think tank on sustainable development that is part of the French Political Science Institute. I am focused on urban issues.

My presentation will concentrate on mobility policies that are currently being implemented in California and will include a few reflections on evaluations. I will focus on the way climate change is taken into account in transportation policies.

In California, new transit policies are being planned. Due to the fact that these policies are a rather “grey area”, it is difficult to know how assessment will be carried out once the measures are implemented. Moreover, the regulations focus on procedures that set targets with a schedule. Evaluation tools are discussed progressively while the implementation tools are being discussed.

I. Challenges Related to Climate Change

1. Demography

The rapid population growth of 500 000 more people every year will result in a population of 44 million inhabitants in the State in 2020. This situation raises issues related to climate change. Moreover, the ageing of the population has an impact on population mobility.

2. Jobs

By 2020, a large number of companies should be created and developed. By that year, 20 million new jobs will be created.

3. Households

Households will be spreading across the State. People will be settling outside of cities and will have to go to their companies by car, the only existing transportation means.

4. Mobility

Over 90% of Californian drivers drive alone to work, while 87% of all trips take place by car. By 2035, the number of daily car trips is expected to increase by 32%, which should increase the number of vehicle miles travelled by approximately the same amount, increasing congestion by 103%.

5. The Economic Crisis

The State deficit has reached over \$20 billion. The State transit funding was cut by three billion dollars over the past two years. Many transit works have been interrupted.

The unemployment rate has reached 12.5%, a terrifying figure in California, where people do not enjoy the same kind of safety net as in France. The number of home foreclosures in California is one of the largest in the United States, reaching over half a million since the beginning of the crisis.

When households can no longer pay, local governments are at risk, as half of the budgets of local governments is based on local taxes. All of these factors have an influence on how local policies are being drafted and implemented, especially in relation to climate change.

II. Adaptation

1. The Three Prongs

Adaptation to climate change involves hazard, vulnerability, and risk:

- Hazard: Before taking action, it is necessary to determine the future impact of climate change.

Evaluation is key.

- Vulnerability to the consequences of climate change.
- Risks to climate change.

III. Transportation

Transportation is responsible for nearly 40% of greenhouse gas emissions in California. The figure reaches 50% in certain urban areas. Reduction of such emissions is a key for adaptation and mitigation strategy.

IV. Effects of Climate Change

It is important to assess the known effects of climate change and to compare them to what they are going to be in the near future. Such effects include:

- A temperature rise.
- A raise in sea level, posing a direct threat on transportation infrastructure and an impact on the materials used and the way they are used in building infrastructure.
- Flooding will be more frequent.
- Heat waves will worsen and become more frequent. They will have a direct impact on transportation infrastructure and will increase the number of natural disasters.

V. Mobility Policies

1. Taking Account of Climate Change Effects

We can examine the extent to which climate change effects are taken into account in mobility policies. It is necessary to consider the level of exposure to a hazard, the degree of sensitivity to that hazard, the ability to respond, and the barriers to adaptation.

We need to seek ways to reduce the vulnerability to changing conditions or to increase the resiliency of our infrastructures once the changes are felt.

At the State level, the focus has been on generating information on the nature of climate-related risks. An Action Plan is being drafted.

At the Regional level, some adaptation actions have been undertaken in specific areas.

2. Mitigation

We also need to examine the extent to which climate change responsibility is taken into account in mobility policies.

The California cap-and-trade program will be developed by 2011. The first compliance period will take place by 2012. An inclusion of transportation will take place by 2015, provided that the Obama Administration does not receive a cap-and-trade program at the Federal level.

A lot of debate is raging around the idea of auctioning the allowances, on their distribution and on how the funds will be used.

Californian policies dealing with mitigation actions are covered by the law AB 32, which sets up targets for 2030 and 2050. This law appoints one authority in charge of implementation.

AB 32 is comprised of three parts.

- The first part, the Light-Duty Vehicle Greenhouse Gas Standard.
 - AB 1493, deals with transportation. The idea was to ask the EPA to allocate an allowance. The French-inspired bonus-malus would be a model here.
 - The Zero Emission Vehicle (ZEV) program is related to grant funding.
 - Vehicle Efficiency Measures ensure that tires are properly inflated when vehicles are serviced.

- The second part, the Low Carbon Fuel Standard (LCFS), is related to leakages. They could be offset by the Vehicle Miles Travelled (VHT) system.

- The third part, covered by SB375, is related to regional greenhouse gas reduction targets for cars and light trucks for 2020, 2035, and 2050. Regional authorities are responsible for these targets. In the United States, these regions have very little authority when compared to the States and the Federal Government.
 - Targets will be set by the California Air Resource Board (CARB), in consultation with for 18 Metropolitan Planning Organizations (MPOs), by September of this year.
 - Implementation will be carried out by means of the “stick and carrot” balance involving smart growth targets, transportation funding incentives and environmental review incentives.
 - Two tools are used for follow-up and assessment of these targets. First, modeling is carried out for transportation and land use. Second, the Best Practices Management Excel spreadsheet shows which kind of policy will help with given objectives.

3. Conclusion

We need to study these different policies and see who will be in charge of what for AB 32.

The Transportation ASIF Framework defines four basic components that drive greenhouse gas emissions in transportation: Activities, Mode Share, Fuel Intensity, and Fuel Choice. To reach the 2020 targets, we will need to focus on the fuel intensity of the vehicles and on the reduction of the carbon content of the fuel mix used by the vehicles.

Smart growth policies are long-term policies, whereas these targets are short-term. There is still a great deal of uncertainty with regards to the level of adoption possible through smart growth policies.

Part II: Debate

Jean-Pierre Orfeuil

My first comment regards the procedure you described for regions and metropolitan areas. This seems similar to the Plans for Urban Transport (PDU) in France where the state sets a firm outline and it is up to the cities to fill in depending on their aims, wishes, and sensitivities. Second, the figures you gave about the distribution of the various emission levels seem very much like those in France. The difference is that in France we do not reveal such figures. I think that the system in the United States accepts different sources of efficiency, while in France it does not. More even in US.

Benoît Lefèvre

For the comparison to the PDUs in France: The aim of the greenhouse gas reduction targets falls under the responsibility of the car and not a city, local authority, or region. However, it falls under the responsibility of regions to consider the issues with the various stakeholders at public hearings. It is up to each region or local authority to decide if it will adopt the measure. In the U.S., political decisions are completely decentralized. Verification of compliance falls under citizens' enforcement at the grass roots level. Due to this situation, it is not clear whether these laws will be enacted or enforced.

Mark Wilson

I live in the San Francisco Bay area. What California has been doing is basically pageantry. Until a few years ago, it was thought that California would get pre-empted. No one, including the stakeholders, was paying attention to what the California Area Resource Board was doing.. People are just now starting to pay attention to the CARB process.

From the Floor

I was struck to hear that in the San Francisco Bay area 6% of the trips were done by public transport and 10% by walking or by bike. I was in San Francisco last year. Corporate representatives who worked in Silicon Valley explained that they had created transport systems for their employees within companies. Also, regarding the smart growth program, does it apply only to new building projects?

Benoît Lefèvre

The figures for San Francisco are given for the number of trips made, not the distance travelled. I think it would be more interesting to see the distance travelled.

Corporate transport programs for employees have been common in Silicon Valley. Companies now want to do it in a greener way, with electric vehicles and car-pooling. They did it because employees were losing a lot of time commuting to work and were not interested in settling in Silicon Valley.

The idea of smart growth was to reduce urban sprawling. It targeting new constructions to respond to population growth but it also wanted the building to be greener and built within cities. It is related to existing buildings, because the idea is to increase population density. It is harder to a rebuild a city than to make a city bigger.

From the floor

You talked about different methodologies to assess the contribution of traffic to greenhouse gas emissions. Have there been assessments to see the impact of busses and how they could help reduce greenhouse gas emissions in the near future? Also, do you have more information about feedback from inhabitants? Is there a dialog between authorities and local inhabitants?

Benoît Lefèvre

Assessment on the contribution of a public transport system has been carried out. The ASIF Framework shows what each of the different features could contribute. It is a sensitive issue, because the figures provided do not take life cycles into account.

On feedback from inhabitants, different bodies, such as the Air Resources Board or local authorities have the duty to organize public hearings. The residents who attend are extremely knowledgeable. There is a genuine dialog between public authorities, residents and a wide range of stakeholders. It is an informed debate.

Jean-François Bouilhaguet

Can you speak of the principle of modeling the average car in drafting the rules and regulations in California?

Benoît Lefèvre

The vision of the existing model in different metropolitan areas for vehicles has been done. The ability of different models to take into account new policies has been tested. The majority of existing models were developed when the main objective was to build new roads and highways. They cannot take into account smart growth type policies. This is a huge problem for defining policies and for assessing the level of greenhouse gas emission reduction. There is a broad program to update these models, partly funded by the State of California. This kind of debate has also taken place at the Federal level. I am sure this question will move forward.

From the floor, student at Paris Dauphine

First, regarding the projected population and job growth in California, do you have any idea of which jobs will require the highest number of employees and how much the jobs will pay? Second, regarding climate change adaptation and the rise in sea levels, is it a business-as-usual scenario?

Benoît Lefèvre

Rise in sea levels is a realistic intermediate scenario with temperatures rising by more than 2° C. Four scenarios have been assessed.

To answer your first question, what is interesting is that many people in the United States strive for what they call the “American dream”, the house in suburbs with a backyard in a no man’s land. It is also due to urban planning rules and tax incentives. Today, there is a huge demand to return to the city centers, due to the aging of the population, the desires of young adults to live in big cities, the reduced size of households, and the population growth due to the immigration of Latinos and Chinese. We tend to underestimate this demand and the opportunities for the real estate market in terms of smart growth policy.

Conclusion

Edwin Zaccai

Director, Sustainable Development Research Center, Free University of Brussels (ULB)

I would like, by way of conclusion, to underline some key points of our evening.

We have seen that this seminar has been dedicated to much wider and deeper issues than the question of evaluation. We have tried to be as precise as possible. This has been a rare opportunity to look at how policies are set up. There is a great deal for us to reflect upon.

It has also been particularly interesting to have an insider here. He spoke of the strategy of reinforcing EPA. He informed us about providing the administration with a specific mandate to get regulation so as to put pressure on corporate level. Companies in turn might have more incentives to agree with policies that are being elaborated by the U.S. President and his Administration.

We had many precisions about how policy at the Federal level is worked out. We also have observed how difficult it is for the U.S. to commit in a forum such as Copenhagen. All of this is very much in line with what we expected, but it comes as confirmation.

The price of fuel for transportation in the U.S. is lower than in Europe. Fuel price is linked to the number and categories of vehicles being marketed. There is a clear relation between this fact and the average lower consumption/vehicle in Europe compared to the US. Mark Wilson also mentioned the rise in fuel and oil prices as a reason for the weakening of the automotive industry in the U.S. It is difficult to predict what will happen in the near future: will the trends of consumption/car be durably changed in the US?

I believe that the oil price has been and will be a key factor for all the issues we have been discussing. Indebted US households living the farthest from their working place have had in average more difficulties in paying their mortgages. The rise in oil price has therefore been one of the many factors underpinning the real estate crisis.

With regards to *what* is being assessed, I would like to highlight the importance of policy objectives as well as the importance of discussing the targets with all of the stakeholders.

In dealing with climate change policy, a key factor is economic regulation. It has also been said that some policies will make some targets mandatory at some level whereas technologies will not be mandatory. However, specific funding would be allocated for certain technologies. I believe that there is more room for debate on this issue, to better understand their links. These two elements, targets and technologies, should be interlinked and they probably are for a number of actors.

As to *who* does the evaluating, we have seen that there are many players in private evaluation. This goes hand in hand with the fact that there is no precise evaluating methodology at the moment for these policies. The means to the evaluating are left for the players to be chosen.

I would like to thank both speakers for this extremely fruitful dialog. I hope the audience found it as interesting as I did.