

CAN Europe's feedback to EU Commission call for evidence Legal framework for the possible use of international carbon credits towards the 2040 EU climate law target

CAN Europe has repeatedly argued that, to align with the 1.5°C temperature limit and equity, the EU [could](#) and [should](#) achieve domestic net zero emissions by 2040 at the latest, based on at least 92% gross reductions compared to 1990 levels. This should also be based on the EU achieving at least 65% gross (76% net) emission reductions by 2030, and at least 82% gross (94% net) domestic emission. On top of this domestic ambition level, the EU should also increase support to Global South countries for mitigation, adaptation and loss and damage (CAN Europe, 2024), including through international climate finance (which should not be confused with and replaced by international carbon credits transactions under Article 6 of the Paris Agreement; see Mulder, 2025) to fulfil Article 9.1 of the Paris Agreement and the New Collective Quantified Goal (NCQG) \$300 billion target.

CAN Europe continues to reject the inclusion of international carbon credits (Article 6 of the Paris Agreement) within the EU climate policy framework. This inclusion would severely undermine the ambition and environmental integrity of the EU contribution, with assessments showing systemic problems in carbon credit markets (Coglianese & Giles, 2025) and that in most cases credits do not reflect real emission reductions or removals (Probst et al., 2024). Article 6 rules do not bring about transformative change and risk repeating past mistakes (Dossi F. and Crook J., 2025; Mulder I. and Faecks B., 2025). At the same time, it would delay and increase the cost of the transition; each year, to buy international credits the EU would need to pay up to tens of billions of euros that would have otherwise been invested in domestic decarbonisation, accompanying social measures and genuine international climate finance, raising important questions regarding the acceptability of this operation to the general public. The policy package to implement the EU's 2040 target should be designed based on a domestic 90% net emissions reduction ambition; if any international credits are to enter the EU climate framework, that inclusion should come as late and in as limited a way as possible as a last resort flexibility option for individual Member States to meet their national climate targets.

We also stress the importance of not using international credits for compliance within the EU ETS, as this would severely risk undermining its correct functioning. If international credits are integrated into the EU climate framework, their use should not be mandatory for Member States, should be strongly disincentivised, appropriately justified, and financed through the resources of those Member States that decide to use them. The EU would need to establish and guarantee strict safeguards and quality criteria for the credits, building on but going beyond those established under the Paris Agreement Crediting Mechanism (Article 6.4) through strengthening the dimensions of permanence and human rights, which are currently weak. Any purchase of credits lacking full environmental integrity (such as non-permanent land-based credits) or associated with human rights violations would risk seriously damaging the EU's reputation. If a decentralised procurement by Member States is foreseen, the EU Commission would have to oversee and authorise their purchase to guarantee their high quality. If on the other hand, an EU centralised purchase approach is established, individual Member States that decide to use international credits must provide the financial resources for their purchase.

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