

CAN Europe's feedback to EU Commission call for evidence National targets and flexibilities in the EU climate policy framework after 2030

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 by 2035. On top of this domestic ambition level, the EU should also increase support to Global South countries for mitigation, adaptation and loss and damage, 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).

Binding national climate targets are essential for ensuring accountability, fairness, progress monitoring, predictability and promoting national investment and planning, and must be maintained after 2030. Any non-binding approach (e.g. two-levelled targets) would jeopardize achieving EU climate targets. The future framework should ensure separation of gross emission reductions, biogenic sequestration, and permanent industrial removals, with no flexibility between them to preserve environmental integrity and prioritise rapid, deep, and sustained emissions cuts. Maintaining the current scope of the ESR and LULUCF or moving towards economy-wide national targets could be considered, provided the above mentioned separation is met. Sector-specific roadmaps at EU and national level should complement these overarching targets, to ensure structural decarbonisation across all sectors. The agriculture sector also requires a binding EU target for non-CO2 gross emission reductions.

Flexibility must not undermine integrity, accountability, or delay action. We continue to reject the inclusion of international carbon credits, as it would undermine the ambition and environmental integrity of the EU contribution, delay the transition and increase its cost, penalise early movers, shift EU's climate responsibility unfairly to future generations and to other countries, [potentially increasing existing inequalities](#). The post-2030 package should be designed to achieve at least domestic 90% net emissions reduction ambition by 2040. If any international credits are to enter the EU climate framework, they should be used by individual Member States as a last-resort flexibility option to meet their national climate targets, and come as late and in as limited a way as possible. International carbon credits must be excluded from the EU Emissions Trading System. The EU's previous attempt to integrate international carbon credits into its ETS [proved costly](#), depressing carbon prices for years, weakening domestic climate action, and costing MSs billions in lost revenues.

The current ESR and LULUCF enforcement mechanisms of the 1.08 multiplier and corrective action plans should be retained, and applied every two years. Additional mechanisms should also be envisaged: financial incentives (either through direct fines that finance a "climate action fund", or through requiring to dedicate a higher share of EU funds (NRPPs) to climate action) and automatic corrective measures and systematic and timely use of infringement procedures.

Any LULUCF flexibility to address impacts for natural disturbances needs to be conditional on effective implementation of National Restoration Plans.

The CRCF use must not weaken targets, substitute mitigation, enable offsetting, or create risks of double counting.



Climate Action Network Europe asbl
rue d'edimbourg 26, 1050 Brussels, Belgium
Tel: +32 (0) 28944670, fax: +32 (0) 2 8944680
e-mail: info@caneurope.org www.caneurope.org

Climate Action Network (CAN) Europe

 [@caneurope.org](https://twitter.com/caneurope.org)

 [@can.europe](https://www.instagram.com/can.europe)

 info@caneurope.org

 www.caneurope.org