

Revision of national targets and flexibilities in the EU climate policy framework after 2030

Fields marked with * are mandatory.

Introduction

The European Climate Law (ECL) sets an EU climate target to reduce the EU's economy-wide net greenhouse gas (GHG) emissions by 55% from 1990 levels by 2030. This is a binding target for the EU as a whole, as the ECL does not set specific obligations for each Member State. Moreover, it is a net target, as its scope includes both emissions and removals. In December 2025, both co-legislators reached a provisional agreement supporting a legally binding 2040 target of 90% net emission reductions compared to 1990. The agreement also requires the Commission to reflect an adequate contribution towards the 2040 climate target of high-quality international credits of up to 5% of 1990 EU net emissions. This target will give people, businesses and investors greater predictability to plan ahead.

The achievement of the current 2030 target is supported by the EU climate policy framework, which is designed to reduce net GHG emissions in a fair and cost-effective manner, while promoting a just transition, increasing competitiveness and supporting environmental sustainability in all Member States. At the core of this framework are three main components, covering different sectors and using different mechanisms: the Effort Sharing Regulation (ESR), the Land Use, Land Use Change and Forestry Regulation (LULUCF-R) and the EU emissions trading systems (ETS 1 and 2).

The ESR sets binding annual emission limits for each Member State. The limits cover emissions from transport, buildings, agriculture, waste and non-CO₂ emissions in the energy and industrial ETS 1 sectors to ensure gradual and equitable emission reduction. The revised LULUCF-R introduced an EU-wide net carbon removal target for 2030, which is broken down into binding national net removal targets for the land use sector, in order to drive transformative action and investments. For both instruments, national targets are aligned with the EU 2030 climate target. It is up to Member States to define and implement the national policies in the relevant economic sectors to reach the targets. These policies are outlined in the national energy and climate plans (NECPs).

The ETS is an EU-wide market-based system applicable to companies that encourages the reduction of emissions by setting an EU-wide emissions cap while allowing the trading of company obligations, thus putting a price on emissions and fostering a competitive market for efficient low-carbon technologies. The system also requires its proceeds to be invested in order to tackle climate change and adapt to its impacts. ETS 1 covers

sectors such as power generation and industry, some aviation, and maritime. ETS 2, which follows a similar market-based approach, will be operational in 2028 and will cover emissions from fuel combustion in buildings, road transport and additional sectors (mainly small industry not covered by ETS 1). Both ETSS are indifferent as to where in the EU the emission reductions happen.

These legislative pillars of EU climate policy are complemented by a governance framework set by the [Regulation on the governance of the energy union and climate action](#) ('the Governance Regulation'), which lays down regular reporting, monitoring and planning requirements to ensure compliance and increase energy security, competitiveness and sustainability across the EU. In addition, the [Carbon Removals and Carbon Farming Regulation](#) sets out rules for the reliable certification of robust and sustainable carbon removals and soil emission reductions. It includes both carbon farming (LULUCF and, potentially, agriculture), permanent removals (such as direct air capture, biogenic carbon capture and storage, and biochar) and carbon storage in buildings.

As the national climate targets are set only up to 2030, the Commission has started the process of reviewing and potentially revising those targets in line with the EU's 2040 climate target. The aim is to design a new climate framework that achieves the EU 2040 climate target, while fostering competitiveness and environmental sustainability and ensuring cost-effectiveness and solidarity. The initiative will also look at how to ensure greater flexibility to help Member States achieve their targets in the most effective way. Moreover, the framework should also support nature-based removals and biodiversity, further develop the circular economy and a sustainable bioeconomy and secure the related supply chains in the long term, including in the face of climate change. Helping foresters and farmers to adopt improved land management practices so as to increase the resilience of the European land sector is one key example.

In this context, the Commission is launching a public consultation to gather views and evidence on different policy options related to the setting of national climate targets compatible with the EU 2040 climate target. The questions cover issues such as the problems to be addressed, the objectives of EU intervention, the setting and governance of national targets and possible EU enabling measures to support national climate action, particularly in the agriculture and forestry value chains.

This initiative seeks to gather diverse perspectives and insights from all stakeholders, reflecting on existing policy approaches and exploring new avenues to design an effective climate policy framework for after 2030. The policy options addressed in this questionnaire are linked to parallel public consultations on the revision of the [Governance Regulation](#) and on the role of [international credits](#) as part of the policy framework after 2030.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority

- Trade union
- Other

*** First name**

Silvia

*** Surname**

Valentini

*** Email (this won't be published)**

silvia.valentini@caneurope.org

*** Organisation name**

255 character(s) maximum

Climate Action Network (CAN) Europe

*** Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

55888811123-49

*** Country of origin**

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

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| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States
Minor Outlying
Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and
Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic
Republic of the
Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and
Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

Role/position

100 character(s) maximum

In which sector do you / your members operate?

- Public sector / government – International level
- Public sector / government – National level
- Public sector / government – Regional level
- Public sector / government – Subregional level
- Financial and insurance sector

- Research and education
- Social economy
- Energy sector
- Energy-intensive industry / Steel
- Energy-intensive industry / Non-ferrous metals
- Energy-intensive industry / Cement
- Energy-intensive industry / Chemicals and fertilisers
- Energy-intensive industry / Glass and ceramics
- Energy-intensive industry / Pulp and paper
- Energy-intensive industry / Other
- Transport / Aviation
- Transport / Maritime
- Transport / Road transport
- Transport / Rail
- Transport / Other
- Construction/buildings
- Providers of monitoring, reporting and verification services
- Waste management
- Agriculture
- Food industry
- Forestry
- Other

Please provide a short description of your activities in the above-mentioned sectors

50 character(s) maximum

Please indicate your main area of focus or your area of competence

100 character(s) maximum

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the**

purpose of transparency, the type of respondent (for example, ‘business association, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

***Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

To what extent are you familiar with the national targets and rules set out in the Effort Sharing Regulation (ESR), the Regulation on land use, land use change and forestry (LULUCF) and related EU policies?

	Very familiar	Familiar	Only partially familiar	Not familiar
* Effort Sharing Regulation (ESR)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulation on land use, land use change and forestry (LULUCF)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU emissions trading system (ETS 1)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU emissions trading system (ETS 2)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Regulation on carbon removals and carbon farming (CRCF)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulation on the governance of the energy union and climate action	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Renewable Energy Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy Efficiency Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part 2: Problems and objectives

1) To what extent do you agree that the following problems are negatively impacting the achievement of the EU climate objectives?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* There is a lack of alignment between the ESR and LULUCF-R targets and the national climate targets set by Member States themselves, including in the way they are governed.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The efforts currently being made by Member States to achieve climate neutrality are insufficient.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Progress made towards EU climate targets has been uneven across Member States.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There is a lack of coordination between the national targets set by the ESR and LULUCF-R and public spending.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There is a lack of effective economic incentives for economic operators in the agriculture and forestry value chains to invest in carbon farming and increase climate resilience.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* There is a lack of effective economic incentives for industry to invest in permanent carbon removals or carbon storage in products.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There is a lack of effective reporting and accounting systems for emissions and removals in agriculture and forestry value chains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other problems, or combination of problems, should be considered?

500 character(s) maximum

The main issue, i.e. insufficient planning and action, is insufficiently tackled by incentives, compliance & gap-filling mechanisms. In the AFOLU sector, inadequate action stems from counterproductive CAP funding, weak scheme integrity, insufficient MS efforts to manage forests sustainably, policy inconsistencies (e.g. bioenergy), risk and permanence. A reformed CAP could deliver reliable income and resilience for farmers; CRCF offers uncertain, project-based revenues with high complexity & risk

2) To what extent do you agree that the following objectives should guide EU climate policy after 2030?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Ensure that all Member States contribute to the 2040 EU climate target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Ensure that all economic sectors contribute to the 2040 EU climate target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Provide a simple and effective monitoring and compliance mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Design a simple, cost-efficient and flexible EU 2040 climate policy framework	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensure consistency between national climate targets and related energy targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Foster investments to promote the competitiveness of the EU economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Promote a fair and just transition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Foster investments in the infrastructures needed for the green transition (e.g. electricity grids, carbon capture and storage, electrification of transport)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase environmental sustainability and strengthen links with nature and biodiversity protection policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Promote a competitive, resilient, circular and low-carbon bioeconomy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Encourage and reward climate action taken by farmers and foresters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other objectives, if any, should be considered?

500 character(s) maximum

Consistency with the 1.5°C target, equity and just transition, PPP, EE1st, DNSH. Robust governance for effective implementation (in particular binding targets for climate, renewables and energy efficiency paired with effective compliance rules), process participation and transparency. For the land sector, policies must prioritise ecosystem restoration, cascading use and reduced consumption rather than expanding biomass extraction. The EU must consider how to support MS in building public support

Part 3: National targets

Setting of national targets

3) To what extent do you agree with the following options for the setting of national climate targets for 2040 (which could cover emission reduction and/or removals; see Q5)

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
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* National climate targets should be binding, as they currently are under the ESR and LULUCF-R, and they should add up to the EU domestic climate target.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* National targets should combine accountability and flexibility, for example by setting a core target and an additional contribution with more flexibility.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Instead of binding national climate targets, there should be contributions by Member States to an EU-wide target, similar to the model applied under the current Renewable Energy Directive.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Binding national climate targets need to be maintained, as they are key to ensure Member States' accountability to deliver collectively on the EU climate targets, while accounting for equity and solidarity in effort sharing and promoting national investment and planning. Non-binding targets or two-levelled targets including a non-binding level would undermine the robustness of the EU targets architecture and compromise the achievement of the EU climate targets.

4) To what extent do you agree with the options below concerning the distribution of climate action among Member States?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The distribution of national targets should be based mainly on the cost-effectiveness of climate mitigation efforts.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of national targets for GHG emission reduction should be based mainly on solidarity, i.e. the relative capacity of Member States to act (e.g. GDP per capita).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The distribution of national targets should be based on a combination of cost-effectiveness and solidarity.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of LULUCF targets should continue to be based on the national share of total EU-managed land.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of national targets should promote convergence, with a view to achieving climate neutrality by 2050.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of national targets should take into account national circumstances, including the relative share of the different economic sectors covered.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

The assessment of solidarity should include aspects of historical responsibility and respective capabilities and the PPP, as a matter of fairness and reflecting key principles of the UNFCCC and the Paris Agreement, and the TFEU. For LULUCF targets, land area is a relevant factor, but target distribution should also reflect mitigation potential, ecological constraints, and different socio-economic conditions in each country.

Scope of national targets

5) To what extent do you agree with the following options regarding national climate targets for 2040?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Each Member State should have a single net national emission reduction target (including carbon removals).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Each Member State should have separate national targets for emission reduction and removals.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* There should be no national targets. The EU should focus only on comprehensive measures at EU level to achieve the EU-wide climate target.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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What other option, or combination of options, should be considered?

500 character(s) maximum

Three separate targets for gross emission reductions, biogenic removals, and permanent removals. Those components differ in permanence, risks and accounting reliability. Separate targets ensure transparency and preserve incentives for gross emission cuts. Combining biogenic with permanent removals could incentivise additional biomass harvesting e.g. for BECCS and biochar; the EU land sink is declining and requires restoration, not additional biomass demand.

6) To what extent do you agree with the following options regarding the scope of possible national targets for 2040 covering emission reductions?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Member States should have national emission reduction targets covering all emitting sectors.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National emission reduction targets should not include emissions covered by ETS 1.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* National emission reduction targets should not include emissions covered by ETS 1 and ETS 2.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

CAN Europe identifies either the continuation of the current ESR scope, and/or the adoption of economy-wide targets as the best options. Separation between emission reduction, biogenic sequestration, and permanent industrial removals targets need to be ensured. They should be complemented by national sector-specific roadmaps.

7) To what extent do you agree with the following options regarding the scope of national carbon removal targets for 2040?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* National net removal targets should cover only the LULUCF sector.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National net removal targets should cover the LULUCF and agriculture sectors (AFOLU).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National removal targets should cover both the LULUCF sector and permanent carbon removals.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should have two distinct national carbon removal targets: one covering the LULUCF sector and another for permanent removals.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Biogenic and permanent removals need to be kept separate. A single combined removal target risks incentivising additional biomass extraction for engineered removals at the expense of the land sink. Separate targets are essential to prevent substitution between fundamentally different actions. The scale of permanent removals should follow a rigorous sustainability assessment covering planetary boundaries, land and water use, biodiversity, energy and biomass demand, and human rights

8) In the revised European Climate Law, the co-legislators have agreed to support a legally binding 2040 target of 90% net emission reductions, with a domestic target of 85% and up to 5% international credits. To what extent do you agree with the following options regarding the interaction of international credits and national targets?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
National targets should have a domestic component – to be achieved through climate action within each Member State - and an external component - to be achieved through the purchase of international credits by each Member State.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Member States should be able to balance domestic and international emission reduction efforts, provided that the provisions of the European Climate Law are complied with.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National targets should be domestic. International credits should be procured at EU level, for example through an EU purchasing facility, with Member States contributing to their financing.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

CAN Europe continues to reject any inclusion of int. credits in the EU climate policy framework. If any int. credits are to enter the framework, they should be used only as a potential last resort by individual Member States based on appropriate justification, and come as late and in as limited a way as possible. Their use should not be mandatory for Member States, strongly disincentivised, and excluded from the ETS. The framework must be designed to reach at least 90% net by 2040 domestically.

Compliance with and flexibility of national targets

9) How would you rank the following policy options concerning compliance with national climate targets after 2030?

	First choice	Second choice	Third choice
Annual compliance. This option requires defining a precise trajectory for Member States to follow each year to reach their national 2040 targets, with flexibilities.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Multi-year approach. Under this option, compliance is based on the average net GHG emissions or removals over a number of years, e.g. two periods of five years.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Final-year compliance. Under this option, only compliance with the target at the end of the compliance period matters, meaning that GHG emissions or removals in the final year need to be at least equal to the relevant national target in 2040. There could also be intermediate assessment (e.g. in 2035) or assessment over the few final years.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Binding decarbonisation trajectories ensures the highest environmental integrity. A multi-year budget/averaging approach carries significant risks (e.g. enables overreliance on uncertain future reductions/removals, weakens transparency and monitoring). It also fails to account for the increased warming effect of earlier emissions that stay longer in the atmosphere. If applied, it would need to be designed as 2-years budgets/averaging and be combined with an abatement factor (1.08 multiplier).

10) To what extent do you agree that the following measures would provide sufficient flexibility for Member States to deliver on their targets, while safeguarding environmental integrity?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Type of flexibility: Member States should benefit from flexibilities similar to those currently available under the ESR and LULUCF-R, without major changes.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Within the overall EU target, Member States should be able to compensate each other's reduction and removal efforts.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Member States should have the option to compensate efforts to reduce GHG emissions with efforts to increase carbon removals and vice versa.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Member States should have the option to compensate efforts to reduce GHG emissions with efforts to increase permanent carbon removals and vice versa.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to flexibility: Member States should benefit from more flexibility if they make real efforts to achieve a predefined set of common key performance indicators, e.g. to be reported in the context of the future national energy and climate plans (NECPs).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Access to flexibility: Member States should be given some flexibility to achieve their core target and different, wider flexibility for their additional contribution.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to flexibility: Access to flexibility to address impacts of natural disturbances, changes in forest growth or allowing for appropriate structural measures to increase long-term resilience should be based on Member States' policies and measures rather than being linked to achievement of the EU target.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to flexibility: Access to flexibility should be subject to safeguards ensuring that climate measures are not achieved through ecosystem degradation, loss of biodiversity or short-term reductions in biomass or soil carbon and that flexibility supports the long-term resilience of soils and forests.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Flexibility must remain limited, transparent and subject to strict safeguards. Potential less risky options include the trading of efforts between Member States, as far as emission reductions, biogenic sequestration and permanent removals are kept separate. While limited flexibility may be justified to address genuine national circumstances and natural disturbances, expanding flexibilities or introducing two-level target structures risks hollowing out binding commitments.

11) How can the collective achievement of the EU target be fostered by enabling Member States to support each other's efforts to reduce emissions and achieve their binding targets?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
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* Member States can currently support each other by bilateral trading of emission allocations with limited ex post price transparency. Member States should have flexibility similar to the current one, without major changes.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Transparency in bilateral trading possibilities and actual trading should be increased.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be increased EU facilitation of bilateral trading and/or of collective achievement of the EU target (e.g. through an EU facility).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should have increased possibilities to support projects in other Member States.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

CAN Europe rejects the use of int. credits (Art. 6 of Paris Agreement) to achieve the EU climate targets as it would compromise the ambition and environmental integrity of the EU climate contribution (assessments show that int. credits in most cases do not reflect real emission reductions/removals), while only delaying and increasing the cost of the transition. Trade of emission allocations between EU MS is a preferred option as long as no offsetting emission reductions with removals is allowed

12) To what extent do you agree with the following measures to address insufficient progress by Member States towards meeting their national targets and related intermediate milestones?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Member States should be required to undertake additional measures based on recommendations from the Commission.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Member States should make financial contributions to an EU purchasing facility to support emission reduction or carbon removal projects taking place within their own national territory.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should make financial contributions to an EU purchasing facility that invests in emission reduction or carbon removal projects taking place across the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should make financial contributions to an EU facility that invests in high-quality emission reduction or carbon removal projects carried out in non-EU countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

The current ESR and LULUCF enforcement mechanisms of the 1.08 multiplier and corrective action plans should be maintained and applied every two years. Additional mechanisms could include financial incentives (e.g. fines to a “climate action fund” or requiring a higher share of EU funds (NRPPs) to climate action) and automatic corrective measures, including infringement procedures. Such a fund should not be designed or used as an offsetting mechanism.

Part 4: Improved monitoring, reporting and verification, EU enabling measures for the agri-food and forestry value chains, and review of the CRCF Regulation

In the current policy framework, emission reductions are supported through national targets, carbon pricing for sectors covered by ETS 1 and ETS 2, and sectoral legislation (e.g. CO₂ standards for cars). Emission reductions and carbon removals generated in the agriculture and forestry sectors are supported through national targets, the common agricultural policy and the Regulation on carbon removals and carbon farming (the CRCF). The latter will be reviewed in 2026 to assess the possibility of including emission reductions from sustainable livestock management in the scope of the CRCF certification framework. In addition, the review could be an opportunity to clarify how the CRCF Regulation can be used not only for certifying additional climate benefits, through the issuance of certified units, but also for reporting good climate and sustainability performance, without the issuance of certified units, for the purpose of scope-3 reporting within the agri-food and forestry value chains.

Meanwhile, the recently adopted strategic framework for a competitive and sustainable EU bioeconomy introduced the initiative of exploring an EU Buyers' Club to kick-start the CRCF market by giving a clear demand signal for carbon farming and permanent carbon removals.

13) To what extent do you agree with the following options to strengthen EU-wide enabling measures to promote climate action in the agriculture and forestry supply chains?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* There is no need for EU enabling measures to promote carbon farming.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The EU should facilitate a voluntary EU Buyers' Club to pool demand from private companies for the purchase of CRCF credits (certified units) without any further public support.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The EU should set up a voluntary EU-wide facility for purchasing CRCF credits (certified units). Companies, national governments and the EU could use this facility to jointly finance action on carbon farming.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

EU Buyers Club or other coordinated instruments can be very useful to mobilise finance, but their role must remain financial and must not substitute mitigation action. As all removals and reductions generated under the CRCF “shall contribute to the achievement of the Union’s NDC and its climate objective”, buyers cannot use units in corporate accounts, as they cannot be double-counted. We remain concerned about CRCF quality and consider land-based action best supported by activity-based finance.

14) To what extent do you agree with the following options to amend the Carbon Removals and Carbon Farming Regulation?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The scope of the CRCF Regulation should be expanded to include the reduction of livestock emissions (i. e. emissions from enteric fermentation and from manure management).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The CRCF Regulation should be reviewed to allow for the voluntary certification of good climate and sustainability performance, without the issuance of certified units, for the purpose of scope-3 reporting within the agri-food and forestry value chains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

Livestock emissions are structurally embedded in production systems and demand patterns; meaningful reductions require systemic changes rather than credit-based solutions. MRV uncertainty risks overstating mitigation potential and weakening regulatory incentives. The CRCF should be reviewed to be aligned with Article 6 , and regarding the environmental impact of increased biomass use, including the impact on land degradation and ecosystem restoration, as outlined in the CRCF Review Article 18.

15) To what extent do you agree with the following options to support policy planning, as well as harmonisation of monitoring for carbon removals in agriculture and forestry and non-CO₂ emissions from agriculture, that would foster cost savings, investments and simplification for Member States and economic operators?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* National monitoring systems should be made prompter and more accurate so as to better reflect climate action on the ground and allow measures to be planned cost-effectively.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The EU should work to improve integration of national and company GHG inventories and carbon markets.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* National investments in improved monitoring systems should be further recognised and rewarded in the context of national targets.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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What other option, or combination of options, if any, should be considered?

500 character(s) maximum

Reporting can improve transparency, but we already know enough to act. Uncertainty in land-based accounting is inherent, while activity-based support enables a more holistic approach, including biodiversity, resilience and adaptation, not only CO₂. Integrating national and corporate inventories carries many risks e.g. blurred accountability and weakened target integrity. Linking monitoring investments to target compliance would reward accounting improvements rather than emission reductions.

16) To what extent do you agree with the following options aimed at better promoting Harvested Wood Products (HWPs) and carbon storage in products?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Requiring more detailed national reporting for HWPs, including the provision of data on product-specific carbon content, service lifetimes and production or consumption statistics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Implementing new standardised statistics relating to novel long-lived products such as engineered wood (e.g. cross-laminated timber) and other wood-based bioproducts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring Member States to carry out national wood supply and use assessments, including consideration of impacts on the condition of forest ecosystems, biodiversity and long-term resilience, to provide better information for optimal choices on forest protection and timber utilisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>* Requiring Member States to report HWPs produced from imported biomass</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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What other option, or combination of options, if any, should be considered?

500 character(s) maximum

Improved HWP transparency, including imports, is important, but expanding categories will create perverse incentives. Climate policy must prioritise maintaining and restoring forest carbon stocks and ecosystem resilience rather than adding further logging incentives. JRC: “in the short-to-medium term, the potential additional benefits of HWP and material substitution, are unlikely to compensate for the reduction in the net forest sink associated with the increase in harvesting’.

Contact

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