



Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With 200 member organisations active in 40 European countries, representing over 1,700 NGOs and more than 40 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.

6 FEBRUARY 2025

European Climate Law Amendments and Nationally Determined Contributions

To European Commission President Ursula von der Leyen,

To European Commissioner for Climate, Net Zero and Clean Growth, Wopke Hoekstra

Dear President von der Leyen, dear Commissioner Hoekstra,

Exactly one year ago, on 6 February 2024, the European Commission released its proposal for a 2040 emission reduction target, in accordance with the European Climate Law. Since then, throughout 2024, the climate crisis has continued to unfold, with record temperatures in Europe and globally, devastating extreme events such as storms, heavy rains and wildfires, causing human suffering and massive damages to the European societies and economies and our nature, both in Europe and the rest of the world.

The due date agreed by all Parties to the Paris Agreement, including the EU, to submit the next iteration of their Nationally Determined Contributions (NDC) no later than 9 months ahead of COP30 is 10 February 2025. First countries, including the COP30 host Brazil, and the United Arab Emirates, Switzerland, Canada and the UK, have already submitted their NDCs with 2035 targets.

We acknowledge the inclusion of the proposed 2040 target in the Competitiveness Compass. However, with this letter the CAN Europe network would like to express its concern that to date neither a proposal for amendments to the European Climate Law nor a draft NDC with a proposed 2035 target have been put on the table by the European Commission. We witness from conversations with members of the European Parliament as well with Member States that this situation hampers a serious, decision-oriented political discussion and substantively moving forward. We also receive concerns from outside Europe that a delay and an insufficient level of ambition in the EU's NDC might undermine ambitious global climate action, and the block's reputation. **Therefore, we encourage you to move forward and release those critical proposals as soon as possible in order to drive the policy process forward. This would also provide the necessary climate ambition orientation for the Clean Industrial Deal which the Commission is currently preparing.**

Media reporting and statement by officials of the Polish Presidency of the Council of the European Union point to considerations that the EU might pursue a 2035 target, for example in case a decision on a 2040 target is delayed further, based on a straight line between the 2030 target (55% net reductions compared to 1990 levels) and the 2050 climate neutrality goal. This would only result in an approximate reduction of net 66.25% 2035 target. **Such a weak NDC would be a damaging signal to international efforts for the goals of the Paris Agreement**

and also risks to slow down implementation efforts by 2030, as the EU's current targets are wholly insufficient and only compatible with a temperature trajectory of around 3°C.¹

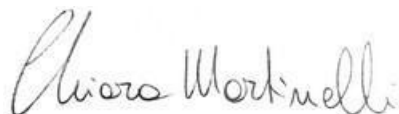
CAN Europe reiterates that, to align with the 1.5°C temperature limit and equity, **the EU should achieve domestic net zero greenhouse gas emissions by 2040 at the latest, based on at least 92% gross emission reductions compared to 1990 levels. CAN Europe calls for an EU 2035 climate target in the NDC of at least 94% net emission reductions by 2035 (including at least 82% gross emission reductions) and an enhanced 2030 target (at least 65% gross emission reductions, equating to 76% net emission reductions)**².

As a key element to underpin those targets in the NDC, the EU needs to develop plans to phase-out coal by 2030, fossil gas by 2035 and oil by 2040 and simultaneously accelerate the deployment of renewable energy, focusing on wind and solar, and energy efficiency measures to reach a fully renewables based energy system by 2040. Further, the future targets should reflect three separate and distinct targets and policies for a) gross emissions reduction, b) net carbon dioxide sequestration in the land use (LULUCF) sector and c) permanent industrial carbon dioxide removals based on a thorough assessment of their sustainable scale-up, taking into account risks, benefits and trade-offs.

While delaying climate action will imply dramatic costs for society and the economy, as highlighted by the devastating climate impacts registered across Europe, acting timely and decisively will bring a wide range of benefits: following an ambitious decarbonisation pathway aligned with the 1.5°C temperature goal, the EU could gain at least €1 trillion already by 2030³. Continuing and accelerating the implementation of the European Green Deal is essential for modernising Europe's economy and protecting citizen health, ramping up competitiveness, lowering household energy bills, shaping a clean industrial transformation, and building energy and socio-economic security through a just transition.

We stand ready to engage further on the content and ambition of the European Climate Law Amendments and the NDC.

Yours sincerely



Chiara Martinelli, Director

¹ <https://climateactiontracker.org/countries/eu/>

² <https://caneurope.org/content/uploads/2024/02/2024.09.24-Updated-Position-Paper-on-EU-climate-targets-and-equitable-GHG-budget.docx.pdf>

³ https://caneurope.org/content/uploads/2024/01/CAN-Europe-co-benefits-of-climate-action_REPORT.pdf