

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.

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CAN Europe letter calls on the European Council to support an ambitious EU 2040 climate target ahead of COP30

To: President of the European Council, António Costa

Heads of State and Government of the EU Member States

In view of the 23-24 October European Council, we call on you to support an ambitious domestic EU 2040 climate target aligned with 1.5°C science, and equity. As shown by this summer's record heatwaves and devastating wildfires, the effects of increasing global warming are dramatically felt in both the EU and the rest of the world. The recent report by the European Environment Agency (EEA) indicates that between 1980 and 2023 weather- and climate-related extreme events caused over 240,000 fatalities and EUR2023 738 billion in the EU-27, with over EUR2023 162 billion in costs from 2021 to 2023 alone. While delaying climate action will imply dramatic costs for society and the economy, as highlighted by the European Climate Risk Assessment, acting promptly and decisively will bring a wide range of benefits: following a more ambitious pathway, the EU could gain at least €1 trillion by 2030. Meanwhile, the latest EU barometer confirmed that European citizens regard climate action as a key priority. With COP30 fast approaching, it is critical that the EU demonstrates its commitment to the Paris Agreement by showcasing an ambitious, science and equity-aligned 2040 target and NDC.

The 90% net 2040 target proposed by the European Commission's amendment proposal to the European Climate Law already lags behind a science-aligned and fair EU contribution. Both the Commission's own Impact Assessment and the European Scientific Advisory Board on Climate Change (ESABCC) in fact recommend a 90-95% net domestic target, and indicate that higher ambition levels are the most beneficial and better reflect equity principles. Earlier this year, coalitions of businesses, investor groups, local and regional authorities, trade unions and civil society groups called for an "at least 90%" net target. Thousands of European citizens are currently calling for the EU to uphold ambitious climate targets without loopholes. CAN Europe reiterates that, to align with the 1.5°C temperature limit and equity, the EU should achieve domestic net zero emissions by 2040 at the latest, based on at least 92% gross reductions compared to 1990 levels.

Ahead of COP30, it is critical that the EU demonstrates leadership by delivering an ambitious NDC under the Paris Agreement that lives up to the Union's responsibility as a historic emitter and affluent region that can drive ambitious climate action by other large emitters. In its recent Advisory Opinion, the International Court of Justice (ICJ) also made it clear that to comply with the obligations under the Paris Agreement, the content of the NDC must be an "adequate contribution" to the achievement of the 1.5°C objective following clear criteria, to be assessed in light of the principle of common but differentiated responsibilities and respective capabilities. To this end, the domestic 2035 NDC target must be derived from an ambitious 2040 target.

The ICJ further reaffirmed the duty of cooperation, including through scaled up financial assistance, technology transfer and capacity-building, to enable developing countries to fulfil and enhance their NDCs effectively in line with Paris Agreement goals. **We urge all EU Member States to announce, before or at**

¹https://www.corporateleadersgroup.com/news/business-and-investors-call-eu-set-greenhouse-gas-emissions-reduction-target-least-90-2040 and https://caneurope.org/hac-2040-letter/; **COP30, how they will scale up their individual climate finance contribution between now and 2030** (in line with the USD 300billion goal of the New Collective Quantified Goal (NCQG) for 2035), including a substantial increase of grants, to contribute to at least a tripling of adaptation finance, and new contributions to the Fund to Respond to Loss and Damage.²

Regarding the EU 2040 climate target debate, we are also concerned about discussed flexibilities. Ambitious EU climate targets should be underpinned by a <u>robust policy framework and appropriate enabling conditions</u>:

- The inclusion of international carbon credits (Article 6 of the Paris Agreement), even if only from 2036 onwards, will severely undermine the ambition and environmental integrity of the EU contribution, while only delaying and increasing the cost of the transition, weakening investment certainty within the EU and competitiveness, with far-reaching financial implications for the EU and Member States. These financial risks would even be exacerbated if Article 6 credits were to be integrated into the EU Emissions Trading System (ETS). Therefore, while CAN Europe resists the inclusion of credits in the EU target, we stress the importance of not considering them for carbon market compliance.
- Allowing more flexibility for Member States to meet sectoral targets risks weakening incentives
 for progress in key sectors like transport, buildings, or agriculture, undermining the core logic of
 economy-wide decarbonisation. National-level binding targets must continue to play a key role.
- Full implementation of the European Green Deal as a minimum requirement, the overachievement of the EU 2030 climate target in line with science, is critical towards the neutrality goal for the EU economy. Even though some targets have improved on paper (in the final NECPs) Member States are still Lacking commitment and necessary measures and financing to deliver. An ambitious and stable EU framework is essential to empower stakeholders e.g. local authorities and businesses to invest in the transition. We urge you not to support attempts to weaken elements of the agreed 2030 climate and energy framework, as we are currently observing around the ETS2 for example, and not to lower social and environmental protection rules and safeguards.

Exactly ten years after the historical adoption of the Paris Agreement, all eyes are on the EU to deliver an ambitious EU 2040 target and NDC ahead of COP30. We also ask you to confirm your participation at the COP30 leaders' summit on 6-7 November in Brazil in order to show your commitment to the Paris Agreement, announce new national pledges of action to progress just transitions and unlock benefits for people and planet, and advance alliances and partnerships for collaborative climate action. This is the concrete signal of the EU's commitment to the Paris Agreement that EU citizens, businesses and the international community are waiting for.

Yours sincerely,

Chiora Marknell

Chiara Martinelli, Director, Climate Action Network Europe

² CAN Europe letter on ECOFIN Climate Finance Conclusions, Oct 2025: https://caneurope.org/letter-to-eu-finance-ministers-on-climate-finance-conclusions-2025/

