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.

29 October 2025

CAN Europe letter calls on Member States to finally agree on an ambitious EU 2040 climate target and NDC ahead of COP30

To: Environment and Climate Ministers of the EU Member States

In view of the 4th November Environment Council and building on the conclusions of the European Council on 23rd October, we urge you to finally agree on an ambitious domestic EU 2040 climate target and Nationally Determined Contribution (NDC) in line with 1.5°C science, and equity, ahead of COP30. There is no further time to waste for the EU to demonstrate real commitment and global leadership in the fight against climate change, as shown by the increasing impacts of global warming felt both in 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 cost EUR2023 738 billion in the EU-27, with over EUR2023 162 billion 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 timely 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.

The 23rd October European Council conclusions provide the mandate for the ENVI Council to promptly agree on the 90% net climate 2040 target put forward by the European Commission's amendment proposal to the European Climate Law. It is important to highlight that **this target level 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 most beneficial and better reflect equity principles.
- In a recent letter, over 2000 scientists call on EU leaders to follow the ESABCC advice to safeguard Europe's future, seizing the socio-economic opportunities to the pathway to climate neutrality.
- Stakeholders across all sectors - businesses and investors, local and regional authorities, and civil society groups - are also calling for the EU to agree on a 2040 target of at least 90%[1].
- 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 <u>domestic net zero</u> emissions by 2040 at the latest**, based on at least 92% gross reductions compared to 1990 levels.

Considering the specific amendments proposed for the European Climate Law, we would like to stress the following:

- **With regard to the proposed amendment for Article 5a (and its reflection in recital 8a), CAN Europe continues to reject any inclusion of international carbon credits** (Article 6 of the Paris Agreement), as it would severely undermine the ambition and environmental integrity[2] of the EU contribution, while only delaying and increasing the cost of the transition. Each year, to buy

[1] https://www.corporateleadersgroup.com/news/business-and-investors-call-eu-set-greenhouse-gas-emissions-reduction-target-least-90-2040 and https://caneurope.org/content/uploads/2025/09/Second-draft-HAC-letter-Sept-2025-.pdf;

[2] The earliest Article 6 deals already testify to problems: Switzerland-Thailand, Switzerland-Ghana, and Guyana, for example. An assessment of the first batch of credits that will be issued under Article 6.4 also uncovered that they likely account for 26x more carbon credits than what would reflect reality. First wave of Article 6 carbon credits misfire spectacularly - Carbon Market Watch

international credits the EU would need to transfer outside of its borders up to tens of billions of euros that would have otherwise been invested in domestic decarbonisation, accompanying social measures and genuine international climate finance. If it all, its inclusion should be considered only as a potential safeguard, and come as late and as limited as possible below the level proposed by the European Commission, based on proper impact assessments. The use of international credits should not be imposed on Member States that do not want to use them; those which make use of credits the least should be rewarded. We support the proposed exclusion of international credits from ETS compliance.

- **It is premature to decide in the European Climate Law amendment process on a major deviation from the current policy architecture**, namely to allow for a limited amount of emissions in the ETS after 2039 (as reflected in recital 8a). This would prejudice the outcomes of the required impact assessments underpinning legislative proposals on the expense of the system's environmental integrity and would create confusing signals for those businesses who have invested under the assumption of the current ETS reduction factor.
- **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.
- As also recommended by the ESABCC**, three separate and distinct targets and policies need to be established for the framework underpinning the 2040 target: 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.
- We urge that **current harvesting levels and practices as the main drivers of declining sinks** in the land sector, over which national governments have control, should be **explicitly mentioned** in the new Article proposals 5.cb (in Danish presidency EUCL version as of 25 October).
- Regarding the possible **integration of permanent carbon dioxide removals (CDR) within the ETS (as considered by the amendments for Article 5b (and reflected in recital 7), we call this specific element to be decided at a later stage in the framework of the discussion on the post-2030 policy package, after a proper impact assessment is undertaken**. Including CDR in the ETS risks turning it into an offsetting mechanism rather than a tool for real emission cuts. It is unlikely to incentivise high-quality removals, and with the CRCF's weak standards, it risks becoming yet another policy tool fuelling biomass use at the expense of the already declining LULUCF sink.
- **Full implementation of the European Green Deal as a minimum requirement, and preferably 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 to resist attempts to weaken elements of the agreed 2030 climate and energy framework.

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 few days ahead of COP30**. In its recent Advisory Opinion, the International Court of Justice 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 and must not be lower than 72.5%, the upper end of the [intended range communicated by the EU to the UNFCCC in September].[3]
Member States reaching this agreement at the 4th November ENVI Council is the last chance for the EU to prove at this critical summit its concrete commitment to the Paris Agreement that EU citizens, businesses and the international community are calling for.

Yours sincerely,

Chiara Martinelli, Director, Climate Action Network Europe

[3] CAN Europe calls for a **domestic 2035 climate target of at least 94% net emission reductions by 2035**, including at least 82% gross emission reductions (based on the proposed climate neutrality by 2040 at the latest).