

Energy, Environment & Transport

The case for separate targets in the EU's 2040 climate strategy

As EU policymakers prepare to announce the specifics of the 2040 target, there is a clear risk the EU's climate ambition could be undermined through a poor design, write Eadbhard Pernot, Mark Preston Aragones and Fabiola De Simone.



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Feb 2, 2024



06:30



4 min. read



Content type: Opinion



Euractiv is part of the Trust Project


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With the potential to shape the European Union's future climate policy, the upcoming 2040 climate target stands as a pivotal milestone in the EU's pathway towards climate neutrality. As EU policymakers prepare to announce the specifics of the 2040 target, there is a clear risk the EU's climate ambition could be undermined through a poor design.

Currently, the European Climate Law sets a net emissions reduction target for 2030 of

at least 55% below 1990 levels – and determines a maximum amount that natural sinks, like trees or soils, can contribute to that overall target. This means that, in reality, the 2030 target translates into 52-54% gross emission reductions once we exclude absorption of carbon by the land sink.

While this 'net' approach provides a broad framework, **there is a need for a more transparent strategy**, that separates climate targets and policies for three distinct end vours: (1) gross greenhouse gas emission reductions, (2) net carbon dioxide sequestration in the land sector, and (3) permanent carbon dioxide removals.

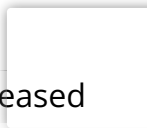
The benefits of separating these targets are manifold.

Firstly, it avoids the potential slowdown of emissions reduction efforts. By treating land sequestration and permanent removals as substitutes for decarbonisation, net targets risk deferring actual cuts in emissions, leading to a phenomenon known as "mitigation deterrence." This could result in emission reductions being delayed or replaced by promises of future removals or sequestration. It is worth noting that the aggregation of emissions and absorptions from the land sink into a net number is already a compromise from the past, given it papers over the degradation of the EU's natural sinks, **which have been declining**.

Secondly, setting separate targets establishes a sustainable role for removals and the land sink. Relying heavily on sequestration and removals to meet climate targets could undermine the primary objective of reducing emissions. Separating land-based sequestration and permanent removals from emissions reduction targets ensures a more balanced and accountable approach, while enabling policymakers to tailor specific policies and measures to enhance progress in those sectors without undermining decarbonisation.

Thirdly, distinct targets enable better governance for land-based sequestration and permanent removals. Both activities have unique challenges and potential negative impacts on biodiversity and local communities. Addressing them separately allows for tailored governance frameworks that maximise benefits (e.g. ecosystem restoration, biodiversity protection, resilience to climate change and soil health) and address risks, fostering trust and transparency.

This separation also provides clarity for land-based carbon sequestration and permanent removal project developers, who often face regulatory uncertainty. Maintaining a separate land-based sequestration target while incentivising nature restoration efforts allows for flexibility without burdening landholders excessively. At the same time, setting a target for permanent removals reduces regulatory risk and supports investment in the sector.

Last but not least, keeping separate targets and policy frameworks clarifies the fundamental principle that emissions reduction and removals are inherently different. Carbon emissions have a lasting and often irreversible impact once released 

into the atmosphere. While sequestration and removals can mitigate this damage, they cannot undo emissions.

In **the European Commission's public consultation on the 2040 target**, a majority of respondents agreed that EU policymakers should adopt three separate targets. More than 100 organisations and academics reiterated this position by signing an **open letter** calling for a separation of targets in the EU climate architecture.

As the Commission prepares to publish the EU 2040 climate strategy, it must prioritise the principle of distinct targets and uphold this approach in subsequent proposals, ensuring clarity, accountability, and effective climate action.

By embracing separate targets, the EU can pioneer a more nuanced and effective climate policy, setting a precedent for other regions to follow. As we navigate the complexities of a changing climate, it is imperative to advance strategies that maximise benefits, mitigate risks, and accelerate the transition to climate neutrality, and negative emissions thereafter.

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