

To:
Heads of governments
Council President
Commission President
Ministers of Environment
Ambassadors from Member States to the EU

We write to you on behalf of Bellona Europa, Carbon Market Watch and Fern - organisations specialising in negative emissions. We would like to urge you to uphold the integrity of the EU's 2030 climate target, in support of the European Parliament's momentous position adopted last week, and in favour of an ambitious and absolute emissions reduction target for 2030.

It is most worrying that the European Commission is leaning towards **blurring** the 2030 climate target, through the inclusion of yet to be defined 'carbon removals' in the proposal to raise the EU's 2030 greenhouse gas reduction target to at least -55%. Furthermore, the accompanying Impact Assessment only assessed net targets (i.e. including removals), revealing that this idea has been in the making for some time. This was not made explicit in the public consultations and therefore **lacks legitimacy and weakens the democratic process**.

The European Parliament has explicitly rejected the idea of combining emission reductions and carbon removals in one target. Their approach would guarantee the credibility -- and ambition -- of the EU's trajectory to climate neutrality by 2050 and is a significant improvement from the European Commission proposal.

Climate targets should serve to provide certainty and send a strong signal to market actors of the importance of reducing emissions. The inclusion of carbon dioxide removals in the target risks diluting both climate mitigation efforts and the benefits of removing carbon from the atmosphere. Both emission reductions and removals serve critical roles in the EU's path to climate neutrality, yet to achieve that goal **they must progress independently of each other**.

To ensure the EU can reach climate neutrality, it will be key to:

- Keep the accounting of removals and emissions reductions separate to ensure both advance at the necessary scale and independent of each other, while avoiding confusion and perverse incentives;
- Develop robust definitions and verification methods for removals;
- Ensure that the removed carbon is atmospheric and is stored in a manner intended to be permanent.

In addition to absorbing carbon, ecosystems such as forests and wetlands are crucial for biodiversity and climate resilience, and must be protected. However, natural carbon sinks are particularly sensitive to 'reversals' (where carbon is released back into the atmosphere) through extreme weather events such as droughts, floods and wildfires. These events are likely to increase in frequency and intensity due to climate

change. This means emissions removals through natural sinks are always temporary and reversible -- another reason why combining removals and emission reductions into the same target is such a mistake.

There are inherent limitations to the deployment of carbon removal processes, such as natural impacts, technological barriers, economics, social acceptance and equity, to name a few. How much carbon we can realistically remove is very likely to fall short of expectations. **Including such uncertainties into the EU's targets creates confusion and can lead to inaction in reducing emissions.**

Carbon removals (including through so-called Carbon Farming) and related governance structures are still to be defined, but removals already appear as core elements of the Commission's proposal. A robust definition of carbon removal and reliable verification methods are an absolute necessity before removals targets can be put in place. In the absence of a separate target, we may end up with car manufacturers selling petrol cars and paying farmers to continue their business-as-usual, without carbon being removed or emissions being reduced.

For the above mentioned reasons and to have a clear 2030 emission reduction target, we call on the European Council and the Environment Council to support an absolute emissions **reduction target, which excludes carbon removals.**

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