

To EU Legislators,

The European Climate Law, currently being negotiated, could make Europe the first climate neutral continent and will bear significant influence for how stakeholders around the world will seek to meet their climate goals.

It is therefore of paramount importance that the proposed architecture embraces transparency and clarity on the 2030 climate target by developing the necessary governance framework for negative emissions separate to the framework for emission reductions.

Switching from an emission reduction target to a combined 'net' target, before developing a sound methodology to properly verify carbon removals, could result in bad accounting and climate plans that fail to reflect reality.

It is clear that carbon removals play a significant role in climate plans¹ and efforts must be made now so that future deployment can be trustworthy and scalable. Carbon removals must be credible before they can be relied upon to balance out residual emissions.

There are many inherent complications to the deployment of permanent, durable and verifiable carbon removal processes. The permanence of storage, risk of reversals, and unintended side-effects are key issues to bear in mind, along with the lack of business models, social acceptance or considerations of equity. Therefore, expectations must be managed and efforts must be made to prevent an overreliance on negative emissions.

This can be achieved with a separate aspirational target for removals that would allow these to be developed and monitored within their own framework, ensuring that ambitious emission reductions are upheld while providing much-needed space for innovation and clarity for investors.

The EU must think carefully about the example it would set in the international arena if it were to adopt a net target for 2030. By combining reductions and removals too early, Europe risks encouraging carbon-intensive companies and high-emitting forest-rich countries to further delay action by explicitly encouraging them to use uncertified carbon removals to compensate the majority of their emissions.

Last year, the European Parliament supported a 60% target for emissions reduction by 2030, without removals, whereas the Council agreed on a 55% net target. On the basis of the above, we urge you as European Legislators to adopt separate targets to ensure short term GHG reductions, and additionally support the development and deployment of robust and sustainable carbon removals.

With urgency and gratitude,

The Signatories

¹ https://www.negemproject.eu/wp-content/uploads/2021/02/NEGEM_D_8_1-1.pdf

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