



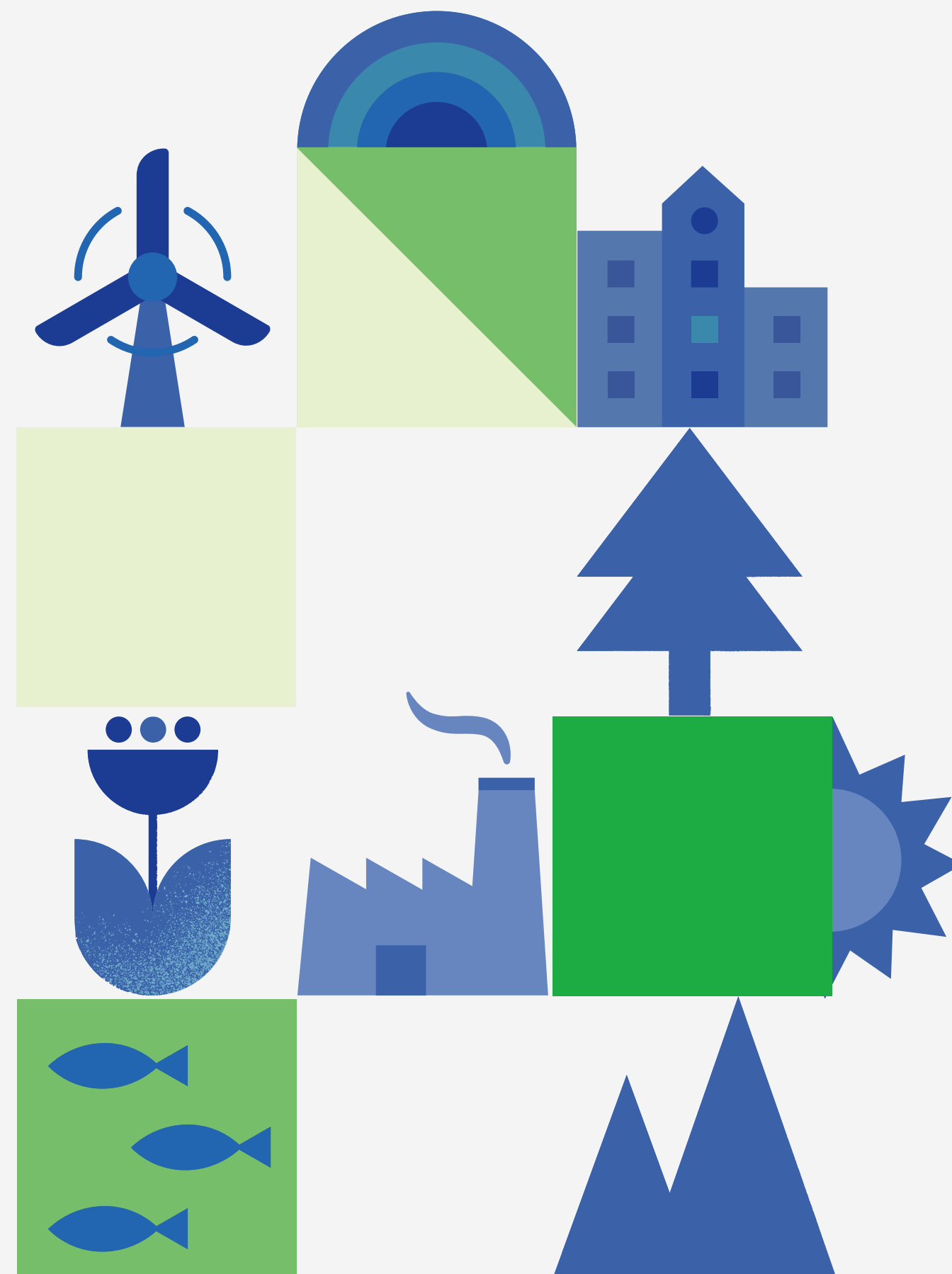
CLIMATE ACTION NETWORK EUROPE

PERSPECTIVES ON THE (MISSING) EU NDC

26/06/2025

Sven Harmeling, CAN Europe

SB 62 session Bonn



On the agenda

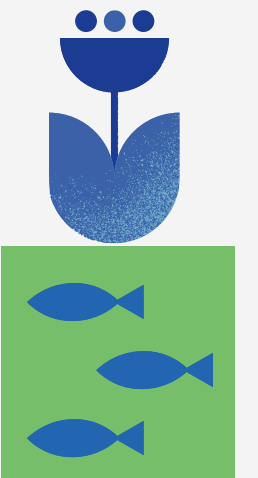
- Why has the EU not submitted its NDC yet?
- What EU's NDC/2040 target MAY look like?
- What EU's NDC/2040 target SHOULD look like?



Climate Action Network Europe



Why has the EU not submitted its NDC yet?



17 June ENVI Council

- Official summary on COP30 debate: “Most of ministers agreed that Europe needs to keep its climate leadership leading by example. Therefore, it is necessary to agree rapidly on an NDC which is ambitious, realistic, science-based, and in line both with the Paris agreement 1,5° target, and with the EU’s 2050 climate neutrality aspiration. Many delegations insisted in the coherence between the NDC objectives and the 2040 target of the forthcoming climate law. However, several ministers warned that NDC objectives should not hinder the competitiveness of the European industry. [...] Many ministers insisted that NDCs must take into consideration the social consequences of the climatic transition”
- Work on NDC on technical level is well advanced, but political agreement on key numbers missing
- 18 September: ENVI Council scheduled to adopt NDC

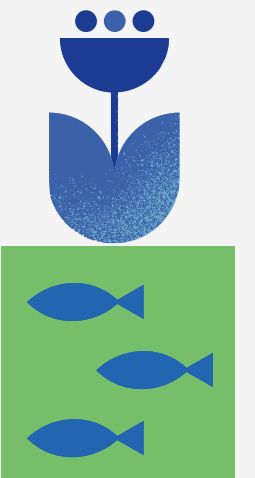


2040 target debate drags on...

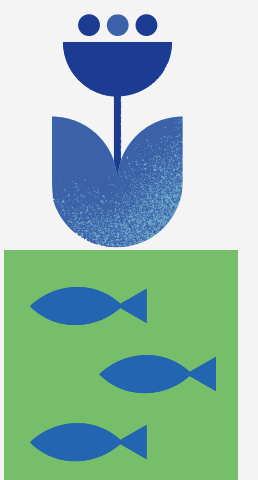
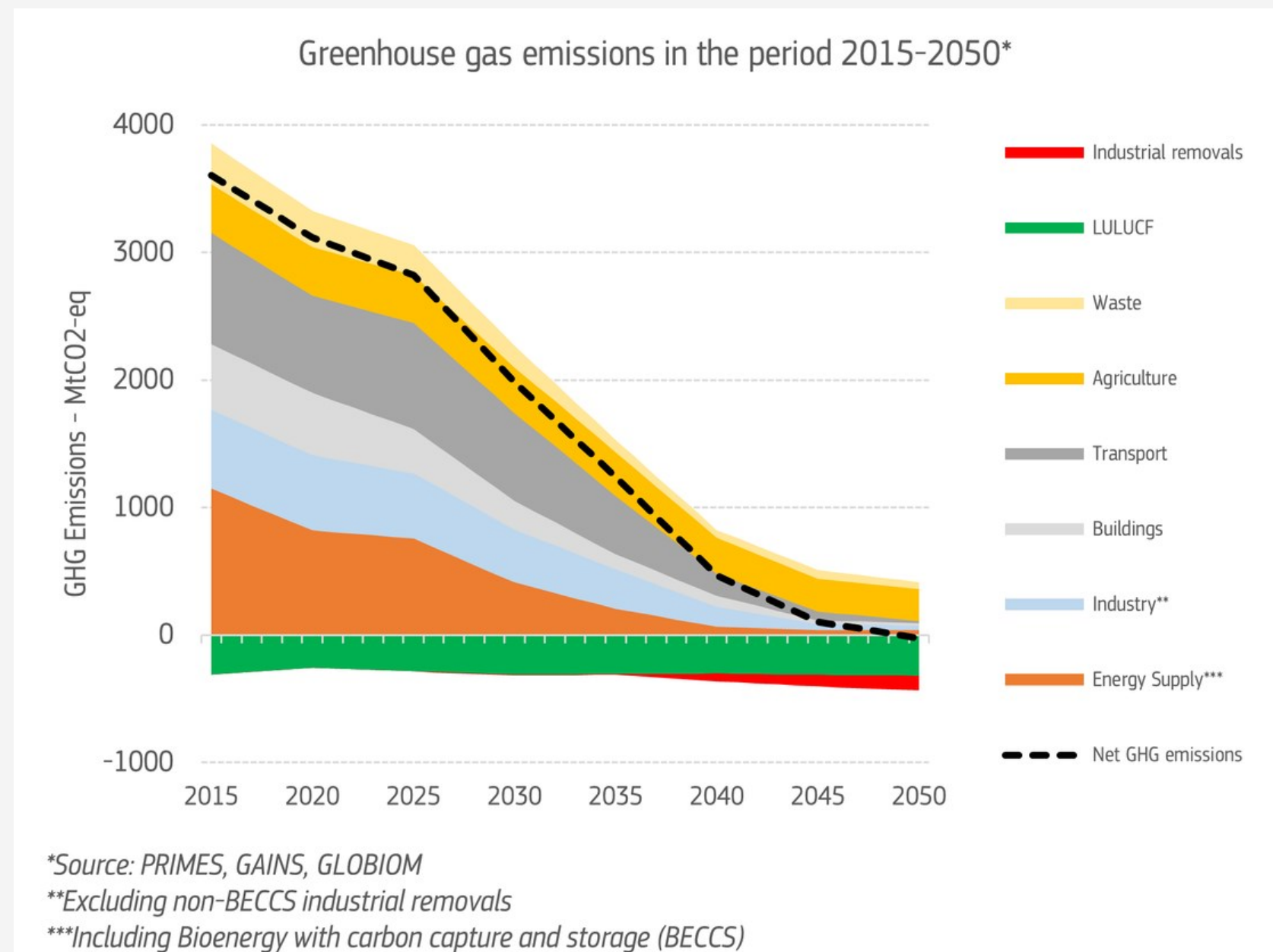
- European Commission proposed in Feb 2024 that the EU should pursue a target of 90% net emission reductions by 2040 compared to 1990, building on the 55% for 2030
- Logic for NDC: agree 2040 target in EU legislation, and derive 2035 numbers as a straight line btw 2030 and 2040 targets
- various political debates at minister and technical levels focused on enabling conditions, how to ensure this supports and not undermines competitiveness etc
- Since months EC was awaited to formally put the EU Climate Law amendment for 2040 on the table, but postponed it due to lack of political agreement, new date 2 July!
- at Heads of State meeting, Macron expected to attack 2040



What EU's NDC/2040 target MAY look like?



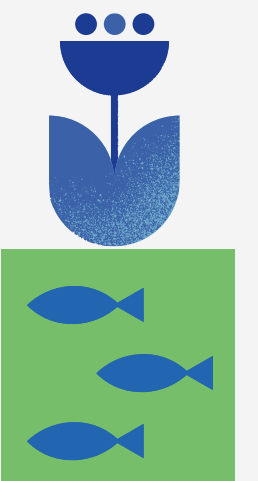
EC impact assessment on proposed 2040 90% target



What do we expect the proposal to include for post-2030?

as of 26 June 2025

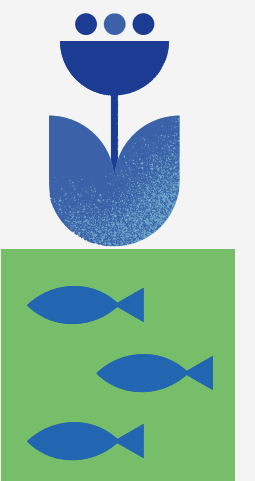
1. **International credits contributing to the 90% net target:** up to 3/5 %, “high quality”, timing not clear (only for 2036 onwards?), further aspects to be elaborated further through legislative package
2. **Relying more on removals:** inclusion in ETS to be proposed? likely no numbers and no specific target; more CDR to compensate for less LULUCF
3. **Providing flexibility between sectors:**
 - non-achievement of LULUCF not to be punished?



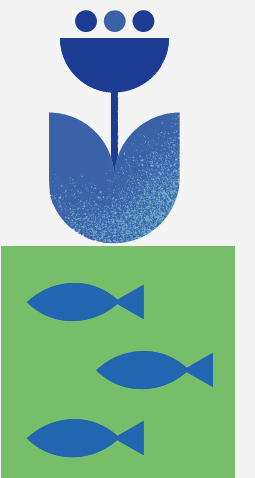
Lack of 2040 agreement would weaken 2035 NDC

2035 options

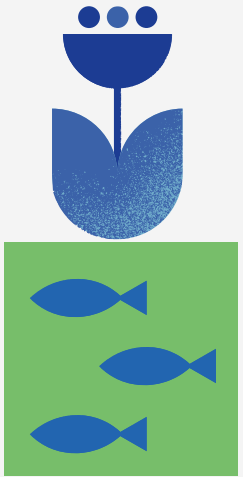
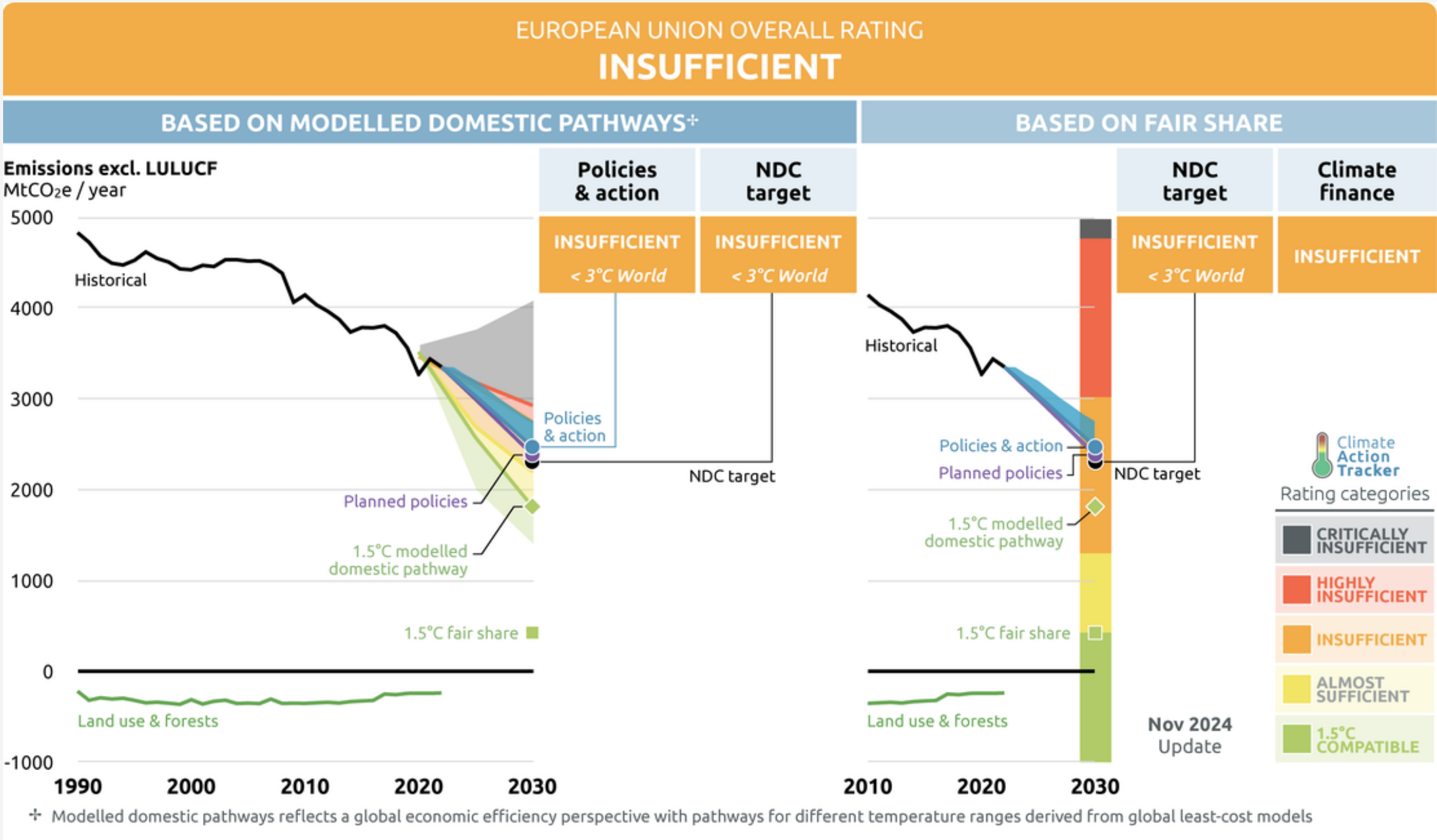
1. 90% target for 2040 implies **72.5% for 2035 NDC** (straight line btw 2030 and 2040)
 2. **66.25% for 2035 NDC** (straight line btw 2030 target and 2050 climate neutrality, if no 2040 agreement now)
 3. some sort of range within those numbers, with big risk of ending up in reality with lower end of range
- tbd: international credits *likely* in 2040 target (not good!), but not necessarily in 2035 NDC



What EU's NDC/2040 target **SHOULD** look like?



Climate Action Tracker on EU



CAN Europe asks for 2040/NDC: 3 targets

Overall net domestic reductions:

2030: at least 76%

2035: 94%

2040: 100%

net negative thereafter

1. Gross reductions:

2030: at least 65%

2035: 82%

2040: 92%

2. natural sinks:

2030: 600 Mt

2035: tbd

2040: tbd

3. permanent industrial removals

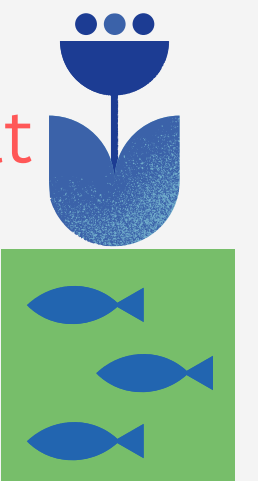
2040: tbd

(result of a rigorous impact assessment conducted in a holistic and interdisciplinary manner)



Further critical elements for EU NDC

- **Energy:** phase-out dates for the various fossil fuels, preferably for coal 2030, for fossil gas 2035, and for oil 2040; commitment to a 100 per cent renewable energy system by 2040
- Binding targets for energy savings are another critical element
- inclusion of sustainable consumption and production aspects in the NDC
- EU must align its NDC with the Global Goal on Adaptation
- Biodiversity and ecosystem protection
- Equity and just transition aspects
- Countering climate disinformation
- Fundamental role of civil society and local levels
- Climate finance for global south: Increase critical, but NDC unlikely to be the tool for that
- BUT no proper NDC specific consultations with civil society by the EU



Conclusion:

- Net zero by 2040 would be EU's best choice in terms of environmental, social and economic benefits, and global responsibility, 90% not fully sufficient
- Achieving even higher reductions by 2030 than planned is possible and would make further progress towards 2040 easier, but deregulating environmental rules which protect Europe's people under the label of "simplification" will not serve that purpose
- **N**ational Energy and Climate Plans for 2021-2030 are fundamental documents that combine the targets, policies and measures planned by EU Member States to achieve their climate and energy commitments, , but yet insufficient
- weeks until mid-September still critical to influence EU for better outcome

