Brussels, 8 January 2024

TO: European Commission and ESABCC
Wopke Hoekstra, Commissioner for Climate Action
Ottmar Edenhofer, Chair European Scientific Advisory Board on Climate Change

# Open letter calling for a firewall between carbon emissions, land sequestration and permanent removals in the EU

**The European Union must explicitly separate targets and policies for emissions reductions, carbon sequestration in the land sector and permanent removals in its post-2030 climate framework**

Dear Commissioner Hoekstra and Professor Edenhofer,

Currently, the European Climate Law sets a maximum amount for removals occurring from natural sinks that can be used to achieve the 2030 net emissions reduction target of at least 55% compared to 1990 levels.

The 2030 target establishes partial separation, and building on this sensible and precautionary approach, the undersigned urge EU policymakers to set separate and distinct targets and policies for gross greenhouse gas emissions reduction, net carbon dioxide sequestration in the land use (LULUCF) sector and permanent carbon dioxide removals. This must be done across the entire EU climate policy architecture, including the setting and implementation of the 2040 target, and the updated nationally determined contributions of the EU and its member states (EU NDC).

The EU must move beyond a 'net' approach when establishing its future climate targets. The current 55% net reduction target is misleading, as, when excluding LULUCF from emissions, it equates to around 52-54% of reduction.

## Benefits of separation

Setting independent and distinct targets for emissions reductions, land sequestration, and carbon removals is beneficial for several reasons:

1) **Avoiding a slow down of emissions reduction efforts.** Net targets treat carbon sequestration in the land sector and permanent removals as substitutes for emissions reductions. This risks so-called "mitigation deterrence", i.e. emission cuts being delayed or replaced by current or promised future removals or sequestration.

2) **Identifying a sustainable role for removals.** Depending heavily on carbon sequestration and removals to meet future climate targets deflects from necessary emissions reductions and undermines the objective of limiting global warming, while increasing the cost of achieving net negative emissions in the future. This is the case for both land-based sequestration activities, which take time to absorb carbon and are susceptible to extreme events, and for most of the novel permanent removal methods, whose feasibility, scalability and impacts are still uncertain. Separating LULUCF sequestration from emissions reduction targets and establishing a fair and sustainable

target for permanent removals maximises the benefits of both activities and ensures accountability while guaranteeing decarbonisation is at the forefront of EU climate policy.

3) **Providing better governance for land-based sequestration and permanent removals.** On the one hand, land-based carbon sequestration is vulnerable to human or natural disturbances, but if enhanced through nature restoration activities and sustainable agricultural and forestry practices, it has multiple benefits for biodiversity and ecosystems. On the other hand, permanent removals have a higher potential to effectively supplement climate change mitigation by securing millennia of storage permanence, but its deployment at scale can be limited due to technological constraints, and energy, land and water requirements. Both types of activities can negatively affect biodiversity and the rights of local communities and indigenous peoples. Addressing these activities separately through distinct targets and dedicated governance frameworks helps provide a safer regulatory space to maximise the benefits and address the risks while increasing trust and transparency.

4) **Enhancing certainty for project developers.** Today, developers of high-quality land-based carbon sequestration activities and permanent removal methods experience uncertainty due to a lack of strategic vision and policy. Maintaining the separate LULUCF target and incentivising nature restoration activities and sustainable agricultural and forestry practices without quantifying the carbon, beyond LULUCF accounting, allows for nature protection and carbon sequestration without placing excessive burden on landholders. At the same time, setting explicit targets for permanent removals would better support developers by reducing regulatory risk and providing long-term clarity, in turn supporting investment.

5) **Demonstrating that emissions reduction and removals are different.** Once released into the atmosphere, CO2 emissions have a permanent and often irreversible impact on the Earth's climate, ecosystems and human health. If done well, land-based carbon sequestration and permanent removals can help limit this damage, but they cannot undo them (if done badly, they can actually increase emissions). The effect of emitting carbon and then removing it from the atmosphere is more detrimental than not emitting it in the first place. Keeping targets and policy frameworks separate helps clarify this physical principle.

## Our demands

We urge EU policymakers to align with what the majority of respondents (54%) to the European Commission's public consultation on the EU Climate Target for 2040 advocated for: **three separate targets for greenhouse gas emissions reductions, land-based sequestration and permanent carbon removals.**

In particular, at this stage, we call on the European Commission to place the principle of three distinct targets at the heart of its upcoming Communication on the EU climate target for 2040 and its accompanying impact assessment.

Furthermore, the Commission should uphold the separation approach in subsequent proposals surrounding the setting and implementation of the 2040 target, and the updated EU NDC.

The undersigned,

**Academics and scientists** (in alphabetical order):

| Name | Affiliation |
|---|---|
| Jonas Allesson | Lund University |
| Sjoerd Bakker | Radboud University |
| Jelle Bijma | Alfred-Wegener-Institut, Helmholtz-Zentrum für Polar- und Meeresforschung |
| Timothée Bourgeois | NORCE Norwegian Research Center |
| Alina Brad | University of Vienna |
| Johanna Braun | Potsdam Institute for Climate Impact Research |
| Wim Carton | Lund University |
| Selene Cobo | ETH Zurich |
| Mark Cooper | University of California, Davis |
| Danny Cullenward | Kleinman Center for Energy Policy, University of Pennsylvania |
| Kate Dooley | University of Melbourne |
| Kate Ervine | Saint Mary's University |
| Jens Friis Lund | University of Copenhagen |
| Jesse Jenkins | Princeton University |
| Injy Johnstone | University of Oxford |
| Wolfgag Knorr | Lund University |
| Bård Lahn | University of Oslo |
| William Lamb | Mercator Research Institute on Global Commons and Climate Change (MCC) |
| Moritz Laub | ETH Zurich |
| Chieh-Yu Lee | University of Groningen |
| Simon Lewis | University College London |
| Wolfgang Lucht | Potsdam Institute for Climate Impact Research and Humboldt University Berlin |
| Laura Marín-Samper | University of Las Palmas de Gran Canaria |
| Nils Markusson | Lancaster University |
| Duncan McLaren | UCLA School of Law |

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|---|---|
| Lucrezia Nava | City University of London |
| Andreas Oschlies | GEOMAR |
| Paul Price | Dublin City University (Adjunct Staff) and eNGOs |
| Gaurav Sant | UCLA's Institute for Carbon Management |
| JP Sapinski | Université de Moncton, Canada |
| Manfred Sargl | University of the Bundeswehr Munich |
| Etienne Schneider | University of Vienna, Department of Development Studies |
| Volker Sick | Global CO2 Initiative at the University of Michigan |
| Gertjan Sonnemans | Utrecht University |
| Doreen Stabinsky | College of the Atlantic |
| Nixon Sunny | Imperial College London |
| Bronislaw Szerszynski | Lancaster University |
| Samantha Eleanor Tanzer | Delft University of Technology |
| Matthew Tarduno | University of Illinois at Chicago |
| Juanita von Rothkirch | ETH Zürich |
| Stefano F. Verde | University of Siena |
| Constanze Werner | Potsdam Institute for Climate Impact Research |

**Research institutes, think tanks and research consortia** (in alphabetical order)

Carbon Drawdown Initiative

Environmental Justice Network Ireland

Institute for Carbon Removal Law & Policy, American University

Institute for Sustainable Development

NEGEM

NewClimate - Institute for Climate Policy and Global Sustainability

Oeko-Institut e.V.

Sandbag Climate Campaign ASBL

Third Generation Environmentalism (E3G)

Zero Emissions Platform

**Companies and business associations** (in alphabetical order):

Aether Diamonds

Airhive

Arca

Bakz4ever

Biocare

Blue Dot Change

Carbo Culture

Carbon-Based Consulting LLC

Carbonaide

CarbonBuilt

Carbonfuture

Climact

Climate Action Platform - Africa

ClimateStrategy

Climeworks AG

Clo Carbon Cymru

Consult Climate

Deutscher Verband für negative Emissionen (DVNE)

Direct Air Capture Coalition

Earthbilt

Equatic

EuroCommerce

German Biochar e.V.

NEG8 Carbon

Nori, Inc.

Parallel Carbon

Patch

Planetary Technologies

Reverce

#SustainablePublicAffairs

Terrafixing Inc.

Thallo

**Non-Governmental Organisations** (in alphabetical order):

Bellona Europa

BEUC, The European Consumer Organisation

Break Free From Plastic

Carbon Balance Initiative

Carbon Market Watch

CarbonPlan

Centre for Grower-centric Eco-value Mechanisms

Clean Air Task Force

ClientEarth

Climate Action Network (CAN) Europe

Climate Action Network (CAN) International

Climate Litigation Network

Comité Schone Lucht

ECOS

European Environmental Bureau

Friends of the Earth Ireland

Global Citizen

Green Transition Denmark

Greenpeace Germany

Iceland Nature Conservation Association

L'Observatoire du Principe Pollueur-Payeur

Leefmilieu

LIFE Education Sustainability Equality e.V.

Naturskyddsföreningen - Swedish Society for Nature Conservation

Natuur & Milieu

Natuurpunt

Oxfam EU

remove

SEO/Birdlife

Tapp Coalition

Terraset

Transport&Environment

Unweltinstitut München e.V.

Urgenda

WISE Netherlands

WWF European Policy Office

ZERO - Association for the Sustainability of the Earth System

**Logos below**

**Logos of companies, institutes and organisations supporting this call** (in alphabetical order):


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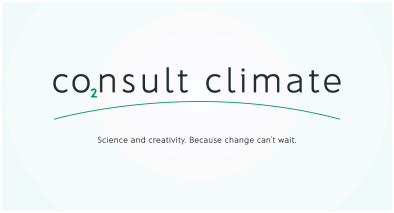
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