

# Open letter calling for a firewall between carbon emissions, land sequestration and 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

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, carbon sequestration in the land use (LULUCF) sector and permanent carbon dioxide removals (CDR). This must be done across the entire EU climate policy architecture, including the 2040 target, the updated nationally determined contributions of the EU and its member states (EU NDC), and all other forthcoming climate targets and their implementation.

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 CDR 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 CDR methods, whose feasibility, scalability and impacts are still uncertain. Separating LULUCF sequestration from emissions reduction targets and establishing a fair and sustainable target for CDR

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 CDR.** On the one hand, land-based carbon sequestration is vulnerable to human or natural disturbances, but if enhanced through nature restoration activities, it has multiple benefits for biodiversity and ecosystems. On the other hand, CDR has 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 and land requirements. Both types of activities can negatively affect 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 CDR methods experience uncertainty due to a lack of strategic vision and policy. Maintaining the separate LULUCF target while incentivising nature restoration activities without counting the carbon allows for nature protection without placing excessive burden on landholders. At the same time, setting explicit targets for permanent CDR would better support developers by reducing regulatory risk and providing long-term clarity, in turn supporting investment.
- 5) **Demonstrating that emissions and removals are different.** Once released into the atmosphere, CO<sub>2</sub> 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 CDR 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 pulling it out of the atmosphere is greater 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, the updated EU NDC and any other subsequent climate target.