

Revision of national targets and flexibilities in the EU climate policy framework after 2030

Fields marked with * are mandatory.

Introduction

The European Climate Law (ECL) sets an EU climate target to reduce the EU's economy-wide net greenhouse gas (GHG) emissions by 55% from 1990 levels by 2030. This is a binding target for the EU as a whole, as the ECL does not set specific obligations for each Member State. Moreover, it is a net target, as its scope includes both emissions and removals. In December 2025, both co-legislators reached a provisional agreement supporting a legally binding 2040 target of 90% net emission reductions compared to 1990. The agreement also requires the Commission to reflect an adequate contribution towards the 2040 climate target of high-quality international credits of up to 5% of 1990 EU net emissions. This target will give people, businesses and investors greater predictability to plan ahead.

The achievement of the current 2030 target is supported by the EU climate policy framework, which is designed to reduce net GHG emissions in a fair and cost-effective manner, while promoting a just transition, increasing competitiveness and supporting environmental sustainability in all Member States. At the core of this framework are three main components, covering different sectors and using different mechanisms: the Effort Sharing Regulation (ESR), the Land Use, Land Use Change and Forestry Regulation (LULUCF-R) and the EU emissions trading systems (ETS 1 and 2).

The ESR sets binding annual emission limits for each Member State. The limits cover emissions from transport, buildings, agriculture, waste and non-CO₂ emissions in the energy and industrial ETS 1 sectors to ensure gradual and equitable emission reduction. The revised LULUCF-R introduced an EU-wide net carbon removal target for 2030, which is broken down into binding national net removal targets for the land use sector, in order to drive transformative action and investments. For both instruments, national targets are aligned with the EU 2030 climate target. It is up to Member States to define and implement the national policies in the relevant economic sectors to reach the targets. These policies are outlined in the national energy and climate plans (NECPs).

The ETS is an EU-wide market-based system applicable to companies that encourages the reduction of emissions by setting an EU-wide emissions cap while allowing the trading of company obligations, thus putting a price on emissions and fostering a competitive market for efficient low-carbon technologies. The system also requires its proceeds to be invested in order to tackle climate change and adapt to its impacts. ETS 1 covers

sectors such as power generation and industry, some aviation, and maritime. ETS 2, which follows a similar market-based approach, will be operational in 2028 and will cover emissions from fuel combustion in buildings, road transport and additional sectors (mainly small industry not covered by ETS 1). Both ETSS are indifferent as to where in the EU the emission reductions happen.

These legislative pillars of EU climate policy are complemented by a governance framework set by the [Regulation on the governance of the energy union and climate action](#) ('the Governance Regulation'), which lays down regular reporting, monitoring and planning requirements to ensure compliance and increase energy security, competitiveness and sustainability across the EU. In addition, the [Carbon Removals and Carbon Farming Regulation](#) sets out rules for the reliable certification of robust and sustainable carbon removals and soil emission reductions. It includes both carbon farming (LULUCF and, potentially, agriculture), permanent removals (such as direct air capture, biogenic carbon capture and storage, and biochar) and carbon storage in buildings.

As the national climate targets are set only up to 2030, the Commission has started the process of reviewing and potentially revising those targets in line with the EU's 2040 climate target. The aim is to design a new climate framework that achieves the EU 2040 climate target, while fostering competitiveness and environmental sustainability and ensuring cost-effectiveness and solidarity. The initiative will also look at how to ensure greater flexibility to help Member States achieve their targets in the most effective way. Moreover, the framework should also support nature-based removals and biodiversity, further develop the circular economy and a sustainable bioeconomy and secure the related supply chains in the long term, including in the face of climate change. Helping foresters and farmers to adopt improved land management practices so as to increase the resilience of the European land sector is one key example.

In this context, the Commission is launching a public consultation to gather views and evidence on different policy options related to the setting of national climate targets compatible with the EU 2040 climate target. The questions cover issues such as the problems to be addressed, the objectives of EU intervention, the setting and governance of national targets and possible EU enabling measures to support national climate action, particularly in the agriculture and forestry value chains.

This initiative seeks to gather diverse perspectives and insights from all stakeholders, reflecting on existing policy approaches and exploring new avenues to design an effective climate policy framework for after 2030. The policy options addressed in this questionnaire are linked to parallel public consultations on the revision of the [Governance Regulation](#) and on the role of [international credits](#) as part of the policy framework after 2030.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority

- Trade union
- Other

* First name

Alexis

* Surname

Kuhl

* Email (this won't be published)

alexis.kuhl@europanel.org

* Organisation name

255 character(s) maximum

European Panel Federation

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

572064811767-22

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

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| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States
Minor Outlying
Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and
Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic
Republic of the
Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and
Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

Role/position

100 character(s) maximum

Senior Climate & Environment Adviser

In which sector do you / your members operate?

- Public sector / government – International level
- Public sector / government – National level
- Public sector / government – Regional level
- Public sector / government – Subregional level
- Financial and insurance sector

- Research and education
- Social economy
- Energy sector
- Energy-intensive industry / Steel
- Energy-intensive industry / Non-ferrous metals
- Energy-intensive industry / Cement
- Energy-intensive industry / Chemicals and fertilisers
- Energy-intensive industry / Glass and ceramics
- Energy-intensive industry / Pulp and paper
- Energy-intensive industry / Other
- Transport / Aviation
- Transport / Maritime
- Transport / Road transport
- Transport / Rail
- Transport / Other
- Construction/buildings
- Providers of monitoring, reporting and verification services
- Waste management
- Agriculture
- Food industry
- Forestry
- Other

Please provide a short description of your activities in the above-mentioned sectors

50 character(s) maximum

Wood-based panels manufacturing and advocacy.

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

To what extent are you familiar with the national targets and rules set out in the Effort Sharing Regulation (ESR), the Regulation on land use, land use change and forestry (LULUCF) and related EU policies?

	Very familiar	Familiar	Only partially familiar	Not familiar
* Effort Sharing Regulation (ESR)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulation on land use, land use change and forestry (LULUCF)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU emissions trading system (ETS 1)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU emissions trading system (ETS 2)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulation on carbon removals and carbon farming (CRCF)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulation on the governance of the energy union and climate action	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Renewable Energy Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Part 2: Problems and objectives

1) To what extent do you agree that the following problems are negatively impacting the achievement of the EU climate objectives?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* There is a lack of alignment between the ESR and LULUCF-R targets and the national climate targets set by Member States themselves, including in the way they are governed.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The efforts currently being made by Member States to achieve climate neutrality are insufficient.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Progress made towards EU climate targets has been uneven across Member States.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There is a lack of coordination between the national targets set by the ESR and LULUCF-R and public spending.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There is a lack of effective economic incentives for economic operators in the agriculture and forestry value chains to invest in carbon farming and increase climate resilience.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There is a lack of effective economic incentives for industry to invest in permanent carbon removals or carbon storage in products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* There is a lack of effective reporting and accounting systems for emissions and removals in agriculture and forestry value chains.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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What other problems, or combination of problems, should be considered?

500 character(s) maximum

Insufficient recognition of long-lived harvested wood products as carbon storage. Limited integration of cascading use principles into climate policies. Inconsistent rules on biogenic carbon accounting. Competition for wood from energy uses reduces material substitution benefits. Fragmented, siloed policies and weak coordination, alongside pressure on the LULUCF sink and declining forest sink capacity, further undermine coherent action.

2) To what extent do you agree that the following objectives should guide EU climate policy after 2030?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Ensure that all Member States contribute to the 2040 EU climate target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Ensure that all economic sectors contribute to the 2040 EU climate target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Provide a simple and effective monitoring and compliance mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Design a simple, cost-efficient and flexible EU 2040 climate policy framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Ensure consistency between national climate targets and related energy targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Foster investments to promote the competitiveness of the EU economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Promote a fair and just transition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Foster investments in the infrastructures needed for the green transition (e.g. electricity grids, carbon capture and storage, electrification of transport)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Increase environmental sustainability and strengthen links with nature and biodiversity protection policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Promote a competitive, resilient, circular and low-carbon bioeconomy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Encourage and reward climate action taken by farmers and foresters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other objectives, if any, should be considered?

500 character(s) maximum

Recognise and incentivise long-term carbon storage in products such as wood-based materials. Prioritise material substitution of fossil-based and carbon-intensive products. Integrate cascading use of biomass into climate policy. Ensure secure and sustainable access to renewable raw materials. Harmonise EU rules for biogenic carbon accounting and promote circular use of renewable resources to maximise climate benefits.

Part 3: National targets

Setting of national targets

3) To what extent do you agree with the following options for the setting of national climate targets for 2040 (which could cover emission reduction and/or removals; see Q5)

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* National climate targets should be binding, as they currently are under the ESR and LULUCF-R, and they should add up to the EU domestic climate target.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* National targets should combine accountability and flexibility, for example by setting a core target and an additional contribution with more flexibility.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Instead of binding national climate targets, there should be contributions by Member States to an EU-wide target, similar to the model applied under the current Renewable Energy Directive.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

A balanced EU framework should combine binding overall EU targets with flexible national pathways reflecting national circumstances. Mechanisms allowing cross-border cooperation, tradable efforts, and recognition of product-based carbon storage should be integrated. Targets should reward early action and enable sectoral contributions, particularly from the circular bioeconomy and long-lived harvested wood products.

4) To what extent do you agree with the options below concerning the distribution of climate action among Member States?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The distribution of national targets should be based mainly on the cost-effectiveness of climate mitigation efforts.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of national targets for GHG emission reduction should be based mainly on solidarity, i.e. the relative capacity of Member States to act (e.g. GDP per capita).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The distribution of national targets should be based on a combination of cost-effectiveness and solidarity.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The distribution of LULUCF targets should continue to be based on the national share of total EU-managed land.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The distribution of national targets should promote convergence, with a view to achieving climate neutrality by 2050.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The distribution of national targets should take into account national circumstances, including the relative share of the different economic sectors covered.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Distribution should also reflect real mitigation potential, carbon storage in products, and sustainable biomass availability. Flexibility mechanisms enabling cooperation between Member States should be expanded to ensure the most efficient and cost-effective decarbonisation pathways across the EU.

Scope of national targets

5) To what extent do you agree with the following options regarding national climate targets for 2040?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Each Member State should have a single net national emission reduction target (including carbon removals).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Each Member State should have separate national targets for emission reduction and removals.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There should be no national targets. The EU should focus only on comprehensive measures at EU level to achieve the EU-wide climate target.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

A dual framework should combine binding national emission reduction targets with distinct targets for removals, including recognition of long-term carbon storage in products such as harvested wood products. Flexibility mechanisms should allow cooperation between Member States. Removals targets should differentiate between nature-based and technological removals to ensure transparency and to avoid substituting genuine emission reductions.

6) To what extent do you agree with the following options regarding the scope of possible national targets for 2040 covering emission reductions?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Member States should have national emission reduction targets covering all emitting sectors.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National emission reduction targets should not include emissions covered by ETS 1.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* National emission reduction targets should not include emissions covered by ETS 1 and ETS 2.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

National targets should concentrate on non-ETS sectors, while ETS 1 and ETS 2 emissions remain governed exclusively at EU level to avoid overlap. Accounting rules should ensure consistency between EU and national frameworks and recognise the role of product-based carbon storage.

7) To what extent do you agree with the following options regarding the scope of national carbon removal targets for 2040?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* National net removal targets should cover only the LULUCF sector.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National net removal targets should cover the LULUCF and agriculture sectors (AFOLU).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* National removal targets should cover both the LULUCF sector and permanent carbon removals.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should have two distinct national carbon removal targets: one covering the LULUCF sector and another for permanent removals.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Targets should also explicitly recognise carbon storage in long-lived harvested wood products as a distinct category within LULUCF. A three-pillar approach could be considered: AFOLU removals, product-based carbon storage, and technological removals, each with dedicated accounting rules. This would ensure transparency, avoid double counting, and better reflect the contribution of the circular bioeconomy to EU climate objectives.

8) In the revised European Climate Law, the co-legislators have agreed to support a legally binding 2040 target of 90% net emission reductions, with a domestic target of 85% and up to 5% international credits. To what extent do you agree with the following options regarding the interaction of international credits and national targets?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
National targets should have a domestic component – to be achieved through climate action within each Member State - and an external component - to be achieved through the purchase of international credits by each Member State.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should be able to balance domestic and international emission reduction efforts, provided that the provisions of the European Climate Law are complied with.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

National targets should be domestic. International credits should be procured at EU level, for example through an EU purchasing facility, with Member States contributing to their financing.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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What other option, or combination of options, should be considered?

500 character(s) maximum

International credits should only complement, not replace, ambitious domestic action. Their use should be strictly additional, based on high environmental integrity and robust accounting rules. Priority should be given to EU-based emission reductions and removals, including carbon storage in products. Any external credits should be centrally governed at EU level to avoid distortions of competition and ensure transparency.

Compliance with and flexibility of national targets

9) How would you rank the following policy options concerning compliance with national climate targets after 2030?

	First choice	Second choice	Third choice
Annual compliance. This option requires defining a precise trajectory for Member States to follow each year to reach their national 2040 targets, with flexibilities.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Multi-year approach. Under this option, compliance is based on the average net GHG emissions or removals over a number of years, e.g. two periods of five years.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Final-year compliance. Under this option, only compliance with the target at the end of the compliance period matters, meaning that GHG emissions or removals in the final year need to be at least equal to the relevant national target in 2040. There could also be intermediate assessment (e.g. in 2035) or assessment over the few final years.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

A hybrid system should be considered: multi-year compliance as the main rule, combined with indicative annual milestones and a mid-term review to track progress. Additional flexibilities should be available for sectors with natural variability such as LULUCF, while maintaining safeguards to ensure continuous efforts.

10) To what extent do you agree that the following measures would provide sufficient flexibility for Member States to deliver on their targets, while safeguarding environmental integrity?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Type of flexibility: Member States should benefit from flexibilities similar to those currently available under the ESR and LULUCF-R, without major changes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Within the overall EU target, Member States should be able to compensate each other's reduction and removal efforts.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Member States should have the option to compensate efforts to reduce GHG emissions with efforts to increase carbon removals and vice versa.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Type of flexibility: Member States should have the option to compensate efforts to reduce GHG emissions with efforts to increase permanent carbon removals and vice versa.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to flexibility: Member States should benefit from more flexibility if they make real efforts to achieve a predefined set of common key performance indicators, e.g. to be reported in the context of the future national energy and climate plans (NECPs).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Access to flexibility: Member States should be given some flexibility to achieve their core target and different, wider flexibility for their additional contribution.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>* Access to flexibility: Access to flexibility to address impacts of natural disturbances, changes in forest growth or allowing for appropriate structural measures to increase long-term resilience should be based on Member States' policies and measures rather than being linked to achievement of the EU target.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>* Access to flexibility: Access to flexibility should be subject to safeguards ensuring that climate measures are not achieved through ecosystem degradation, loss of biodiversity or short-term reductions in biomass or soil carbon and that flexibility supports the long-term resilience of soils and forests.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Flexibility mechanisms should also recognise product-based carbon storage, particularly long-lived harvested wood products, as a contribution to national targets. Cooperation mechanisms between Member States should be expanded, including tradable efforts and joint projects. Any flexibility between reductions and removals must be limited and transparent, with strict safeguards to ensure that genuine emission reductions remain the priority.

11) How can the collective achievement of the EU target be fostered by enabling Member States to support each other's efforts to reduce emissions and achieve their binding targets?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
<p>* Member States can currently support each other by bilateral trading of emission allocations with limited ex post price transparency. Member States should have flexibility similar to the current one, without major changes.</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Transparency in bilateral trading possibilities and actual trading should be increased.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There should be increased EU facilitation of bilateral trading and/or of collective achievement of the EU target (e.g. through an EU facility).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Member States should have increased possibilities to support projects in other Member States.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, should be considered?

500 character(s) maximum

Cooperation mechanisms should explicitly include joint projects for product-based carbon storage, such as long-lived harvested wood products. Flexibility tools should ensure environmental integrity, transparent pricing and equal access for all Member States, particularly for bioeconomy and circular economy investments.

12) To what extent do you agree with the following measures to address insufficient progress by Member States towards meeting their national targets and related intermediate milestones?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Member States should be required to undertake additional measures based on recommendations from the Commission.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Member States should make financial contributions to an EU purchasing facility to support emission reduction or carbon removal projects taking place within their own national territory.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should make financial contributions to an EU purchasing facility that invests in emission reduction or carbon removal projects taking place across the EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>* Member States should make financial contributions to an EU facility that invests in high-quality emission reduction or carbon removal projects carried out in non-EU countries.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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What other option, or combination of options, should be considered?

500 character(s) maximum

Corrective mechanisms should prioritise additional domestic measures and EU-based investments before any external action in non-EU countries. Support facilities should also finance projects that deliver long-term carbon storage in products, notably harvested wood products. Access to EU support should be conditional on credible national plans and milestones, with transparency and safeguards to ensure environmental integrity and to avoid substitution of real emission reductions.

Part 4: Improved monitoring, reporting and verification, EU enabling measures for the agri-food and forestry value chains, and review of the CRCF Regulation

In the current policy framework, emission reductions are supported through national targets, carbon pricing for sectors covered by ETS 1 and ETS 2, and sectoral legislation (e.g. CO₂ standards for cars). Emission reductions and carbon removals generated in the agriculture and forestry sectors are supported through national targets, the common agricultural policy and the Regulation on carbon removals and carbon farming (the CRCF). The latter will be reviewed in 2026 to assess the possibility of including emission reductions from sustainable livestock management in the scope of the CRCF certification framework. In addition, the review could be an opportunity to clarify how the CRCF Regulation can be used not only for certifying additional climate benefits, through the issuance of certified units, but also for reporting good climate and sustainability performance, without the issuance of certified units, for the purpose of scope-3 reporting within the agri-food and forestry value chains.

Meanwhile, the recently adopted strategic framework for a competitive and sustainable EU bioeconomy introduced the initiative of exploring an EU Buyers' Club to kick-start the CRCF market by giving a clear demand signal for carbon farming and permanent carbon removals.

13) To what extent do you agree with the following options to strengthen EU-wide enabling measures to promote climate action in the agriculture and forestry supply chains?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
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* There is no need for EU enabling measures to promote carbon farming.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The EU should facilitate a voluntary EU Buyers' Club to pool demand from private companies for the purchase of CRCF credits (certified units) without any further public support.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The EU should set up a voluntary EU-wide facility for purchasing CRCF credits (certified units). Companies, national governments and the EU could use this facility to jointly finance action on carbon farming.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

EU measures should also recognise carbon storage in long-lived harvested wood products as part of CRCF enabling actions. The CRCF should support not only the issuance of tradable units but also verified reporting of climate performance for scope-3 purposes. Dedicated EU support is needed for monitoring and methodologies adapted to forestry and wood-based value chains. Enabling measures must ensure robust accounting, additionality and avoidance of double counting.

14) To what extent do you agree with the following options to amend the Carbon Removals and Carbon Farming Regulation?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
The scope of the CRCF Regulation should be expanded to include the reduction of livestock emissions (i. e. emissions from enteric fermentation and from manure management).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>The CRCF Regulation should be reviewed to allow for the voluntary certification of good climate and sustainability performance, without the issuance of certified units, for the purpose of scope-3 reporting within the agri-food and forestry value chains.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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What other option, or combination of options, if any, should be considered?

500 character(s) maximum

The CRCF should explicitly recognise and certify carbon storage in long-lived harvested wood products as a distinct category. Methodologies must be adapted to product-based storage, recycling and cascading use of biomass. The Regulation should prioritise robust MRV rules, prevention of double counting, and alignment with LULUCF accounting. Support for scope-3 reporting should be complemented by EU guidance to ensure comparability across value chains.

15) To what extent do you agree with the following options to support policy planning, as well as harmonisation of monitoring for carbon removals in agriculture and forestry and non-CO₂ emissions from agriculture, that would foster cost savings, investments and simplification for Member States and economic operators?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
<p>* National monitoring systems should be made prompter and more accurate so as to better reflect climate action on the ground and allow measures to be planned cost-effectively.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>* The EU should work to improve integration of national and company GHG inventories and carbon markets.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>* National investments in improved monitoring systems should be further recognised and rewarded in the context of national targets.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

EU monitoring frameworks should also cover product-based carbon storage, particularly long-lived harvested wood products, using harmonised methodologies across Member States. The EU should develop common digital tools, and data systems should ensure interoperability between CRCF certification, LULUCF reporting and corporate scope-3 accounting to avoid duplication or double counting.

16) To what extent do you agree with the following options aimed at better promoting Harvested Wood Products (HWPs) and carbon storage in products?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Requiring more detailed national reporting for HWPs, including the provision of data on product-specific carbon content, service lifetimes and production or consumption statistics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Implementing new standardised statistics relating to novel long-lived products such as engineered wood (e.g. cross-laminated timber) and other wood-based bioproducts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Requiring Member States to carry out national wood supply and use assessments, including consideration of impacts on the condition of forest ecosystems, biodiversity and long-term resilience, to provide better information for optimal choices on forest protection and timber utilisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Requiring Member States to report HWPs produced from imported biomass	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

EU policies should formally recognise long-term carbon storage in wood-based panels and other durable products within climate targets and CRCF methodologies. Harmonised EU default values for service lifetimes and carbon content should be developed. Monitoring should reflect cascading use and material substitution benefits. Incentives should promote the use of recycled wood and circular product design to maximise storage and avoid premature release of biogenic carbon.

Contact

CLIMA-NATIONAL-TARGETS@ec.europa.eu