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

A Eurelectric consultation response paper

April 2026

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal:

WG Climate Change & Decarbonisation

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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-CO_2 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 (selected)
- 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 (selected)
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority

- ◯ Trade union
- ◯ Other

* First name

Anton

* Surname

Koninckx

* Email (this won't be published)

akoninckx@eurelectric.org

* Organisation name

255 character(s) maximum

Union of the Electricity Industry - Eurelectric aisbl

* 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.

4271427696-87

* 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
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- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
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- Barbados
- Belarus
- Belgium
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- Bolivia
- Dominican Republic
- Ecuador
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- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
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- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
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- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
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- 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
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- Burkina Faso
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- 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
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- 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

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

Role/position

100 character(s) maximum

Policy Advisor - Climate, Renewables & Storage

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
- [x] 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

Trade association representing electricity sector

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

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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**
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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)	●	○	○	○
* Regulation on land use, land use change and forestry (LULUCF)	○	●	○	○
* EU emissions trading system (ETS 1)	●	○	○	○
* EU emissions trading system (ETS 2)	●	○	○	○
* Regulation on carbon removals and carbon farming (CRCF)	●	○	○	○
* Regulation on the governance of the energy union and climate action	●	○	○	○
* Renewable Energy Directive	●	○	○	○

* Energy Efficiency Directive	◉	○	○	○

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.	○	○	○	◉	○	○
* The efforts currently being made by Member States to achieve climate neutrality are insufficient.	○	○	◉	○	○	○
* Progress made towards EU climate targets has been uneven across Member States.	○	○	○	◉	○	○
* There is a lack of coordination between the national targets set by the ESR and LULUCF-R and public spending.	○	○	○	○	◉	○
* 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.	○	○	○	○	○	◉
* There is a lack of effective economic incentives for industry to invest in permanent carbon removals or carbon storage in products.	○	○	○	○	◉	○

* There is a lack of effective reporting and accounting systems for emissions and removals in agriculture and forestry value chains.	○	○	○	○	○	◉

What other problems, or combination of problems, should be considered?

500 character(s) maximum

Current framework lacks: (1) certainty that CRCF credits can be used for compliance; (2) integration between project-level MRV and national inventories; (3) mechanisms to aggregate demand across buyers. Without addressing demand uncertainty, supply-side measures (CAP, CRCF certification) will not achieve scale.

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	○	○	○	○	◉	○
* Ensure that all economic sectors contribute to the 2040 EU climate target	○	○	○	○	◉	○
* Provide a simple and effective monitoring and compliance mechanism	○	○	○	○	◉	○
* Design a simple, cost-efficient and flexible EU 2040 climate policy framework	○	○	○	○	◉	○
* Ensure consistency between national climate targets and related energy targets	○	○	○	○	◉	○
* Foster investments to promote the competitiveness of the EU economy	○	○	○	○	◉	○
* Promote a fair and just transition	○	○	○	○	◉	○

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

What other objectives, if any, should be considered?

500 character(s) maximum

- Competitiveness and affordability by balancing climate efforts with cost efficiency, while preserving effective price signals
- Security of energy supply
- Stability of the energy system (grid, dispatchable sources, storage)
- Flexibility of regulatory framework and the targets to adapt to shocks and geoeconomic reality

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.	○	○	●	○	○	○

* National targets should combine accountability and flexibility, for example by setting a core target and an additional contribution with more flexibility.	○	○	○	◉	○	○
* 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.	○	○	◉	○	○	○

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

500 character(s) maximum

National targets risk fragmented, cost-ineffective outcomes due to diverse approaches, uneven incentives & limited coordination across MS. If national targets are set, negative impacts from market fragmentation and barriers to cross-border efforts and trade should be addressed, and cross-border GHG accounting rules between MS must be clarified.

For removals, the distinction between nature-based and technological removals, as well as permanent and non-permanent removals, must be kept.

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.	○	○	○	○	◉	○
* 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).	○	○	◉	○	○	○
* The distribution of national targets should be based on a combination of cost-effectiveness and solidarity.	○	○	○	◉	○	○

* The distribution of LULUCF targets should continue to be based on the national share of total EU-managed land.	○	○	○	○	○	◉
* The distribution of national targets should promote convergence, with a view to achieving climate neutrality by 2050.	○	○	○	○	◉	○
* The distribution of national targets should take into account national circumstances, including the relative share of the different economic sectors covered.	○	○	◉	○	○	○

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

500 character(s) maximum

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).	○	○	◉	○	○	○
* Each Member State should have separate national targets for emission reduction and removals.	○	○	◉	○	○	○
* There should be no national targets. The EU should focus only on comprehensive measures at EU level to achieve the EU-wide climate target.	○	○	◉	○	○	○

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

500 character(s) maximum

Whatever the target architecture may be for the non-ETS-covered sectors, efforts must focus on mitigation first and removals second. For removals, the distinction between nature-based and technological removals, as well as permanent and non-permanent removals, must be kept.

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.	○	●	○	○	○	○
* National emission reduction targets should not include emissions covered by ETS 1.	○	○	○	○	●	○
* National emission reduction targets should not include emissions covered by ETS 1 and ETS 2.	○	○	○	●	○	○

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

500 character(s) maximum

The 2040 climate target architecture should ensure that all economic sectors contribute fairly to the EU’s decarbonisation efforts – both ETS and non-ETS sectors. No sector should shoulder an unfair burden to compensate for the lack of emissions reduction in other sectors. ETS2 sectors can be left out of the ESR scope once ETS2 has proven successful.

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.	○	●	○	○	○	○

* National net removal targets should cover the LULUCF and agriculture sectors (AFOLU).		X				
* National removal targets should cover both the LULUCF sector and permanent carbon removals.				X		
* Member States should have two distinct national carbon removal targets: one covering the LULUCF sector and another for permanent removals.			X			

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

500 character(s) maximum

Emissions reduction should be prioritised over removals. Policies and monitoring must keep the distinction between nature-based and technological removals, as well as permanent and non-permanent removals, safeguarding the ‘like for like’ principle. That said, cost-efficiency must be the main driver in achieving the EU's climate ambitions. Carbon removals should remain voluntary for companies.

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.		X				
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.					X	

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.				X		

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

500 character(s) maximum

As intended by the 2040 Climate Law, international carbon credits can be used to reach EU and national climate goals, alongside domestic mitigation efforts (which should retain priority). These credits should be subject to strong guardrails, ensuring credibility, high quality, and robust MRV.

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.		X	
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.	X		
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.			X

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

500 character(s) maximum

Like the current approach, emissions should be tracked annually, but compliance checks should happen every five years. This ensures a balance between the necessary flexibilities, while providing timely opportunity to adjust decarbonisation pathways if decarbonisation efforts prove insufficient. Market liquidity and flexibility could be also ensured by "intertemporal flexibility" – borrowing emissions from future periods, compensated by future removals.

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.	○	○	○	○	◉	○
* Type of flexibility: Within the overall EU target, Member States should be able to compensate each other’s reduction and removal efforts.	○	○	○	◉	○	○
* 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.	○	○	○	◉	○	○
* 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.	○	○	○	◉	○	○
* 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).	○	○	◉	○	○	○
* Access to flexibility: Member States should be given some flexibility to achieve their core target and different, wider flexibility for their additional contribution.	○	○	◉	○	○	○
* 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.			X			
* 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.			X			

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

500 character(s) maximum

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
* 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.				X		
*						

Transparency in bilateral trading possibilities and actual trading should be increased.	○	○	●	○	○	○
* There should be increased EU facilitation of bilateral trading and/or of collective achievement of the EU target (e.g. through an EU facility).	○	○	●	○	○	○
* Member States should have increased possibilities to support projects in other Member States.	○	○	○	●	○	○

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

500 character(s) maximum

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.	○	○	○	●	○	○
* 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.	○	○	●	○	○	○
* 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.	○	○	○	●	○	○

* 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.	○	○	◉	○	○	○

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

500 character(s) maximum

EU money should be invested in EU projects first. The level of a MS's financial contribution to an EU purchasing facility must be independent of the EU's investment location in reduction or removal projects in order to prevent Member States from benefiting from cheap international credits instead of taking domestic action.

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. CO_2 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

* There is no need for EU enabling measures to promote carbon farming.	○	○	○	○	○	◉
* 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.	○	○	○	○	○	◉
* 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.	○	○	○	○	○	◉

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

500 character(s) maximum

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).	○	○	○	○	○	◉
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.						

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

500 character(s) maximum

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-CO_2 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
* 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.	○	○	○	○	○	●
* The EU should work to improve integration of national and company GHG inventories and carbon markets.	○	○	○	○	○	●
* National investments in improved monitoring systems should be further recognised and rewarded in the context of national targets.	○	○	○	○	○	●

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

500 character(s) maximum

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	○	○	○	○	○	◉
* Implementing new standardised statistics relating to novel long-lived products such as engineered wood (e.g. cross-laminated timber) and other wood-based bioproducts	○	○	○	○	○	◉
* 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	○	○	○	○	○	◉
* Requiring Member States to report HWPs produced from imported biomass	○	○	○	○	○	◉

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

500 character(s) maximum

Contact

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