BRIEFING - SEPTEMBER 2025

Driving Change: Creating the EU's Ambitious 2040 Climate Commitment

T&E's response to the European Commission consultation on the European Climate Law amendment

In view of the European Commission's initiative to amend the European Climate Law, this briefing sets out T&E's key recommendations for **a 2040 EU climate target that accelerates and deepens the process started with the European Green Deal and its objective to decarbonise the continent by 2050**.

Key recommendations

Adopt an EU climate target of at least a 90% cut in domestic net greenhouse gas emissions by 2040. T&E calls for an EU climate target of at least a 90% reduction in domestic net greenhouse gas emissions by 2040 (compared to 1990). Starting from 2036, to increase the fairness and equity of its contribution to global climate efforts, the EU could consider including within its domestic net 90% reduction target the acquisition of a limited amount of high-quality, high-permanence international carbon credits characterised by stringent eligibility criteria. If these stringent criteria cannot be guaranteed, international carbon credits should not form part of the EU's target. A strong target is key both to ensure an ambitious updated EU Nationally Determined Contribution (NDC) to the Paris Agreement ahead of COP30, and for the EU's climate policy architecture beyond 2030.

Define a realistic split between emissions reductions and carbon dioxide removal. Whilst the Commission's initiative acknowledges that *"priority should be given to domestic reductions in greenhouse gas emissions, complementing it by increased removals"*, the 2040 target should define a realistic split between domestic reductions and domestic removals to enhance clarity and minimise overreliance on unproven carbon removal technologies. Given the technical and cost uncertainties surrounding engineered removal technologies, this split should be set at the lower end of what is currently assessed to be possible, and as the technologies are deployed this split can be revised based on empirical performance and cost data. Further, the use of carbon removals should be explicitly defined for use within hard-to-abate sectors.

Decarbonise the transport sector to reach the 2040 EU climate target. T&E's Road to Zero scenarios show that the transport sector can cut its emissions by about 70% by 2040 compared to the 1990 baseline. Aside from the existing regulations, which mainly focus on accelerating electrification of road vehicles, carbon pricing, as well as ReFuelEU Aviation and FuelEU Maritime (FEUM) which cover the aviation and shipping sectors respectively, we advocate for transport system efficiency measures as well as a reduction of transport demand where possible.

Strengthen key measures to reach the 2040 target. An ambitious 2040 target is crucial for Europe's transport sector, which alone will account for about 45% of EU emissions in 2030. To reach the 90% net reduction target, the EU must resist pressure to weaken its 2030-2035 zero-emission cars targets and the ETS2, while maintaining the ambition of green fuel targets for ships and planes. We also call upon the EU to introduce an ambitious regulation to electrify corporate fleets, tax the aviation sector, and strengthen truck CO_2 targets.

Include non-CO_2 aviation effects in the climate policy architecture. The Commission must account for non-CO_2 aviation effects and mitigation measures for the 2030–2050 GHG budget, the 2040 target, and the design of policy tools to meet EU's climate goals. Contrail warming - the most significant of aviation's non-CO_2 emissions - must be mitigated to stay on track with the Paris Agreement's temperature goals.

Introduction: what's at stake for EU's climate ambition

Delivering a strong 2040 EU climate target will bring about several benefits for the EU, as it will **boost further investment in the clean energy transition and enhance industrial competitiveness**. The target can ensure the predictability and policy stability investors demand, helping to move away from wasted investments in fossil fuels and to align capital flows with the **EU's net-zero trajectory**.

Moreover, it will bolster energy independence and diversification. Transitioning away from imported fossil fuels will significantly enhance energy security. A strong 2040 target is **a matter of energy security** that could save Europe billions of euros on fossil fuel imports. In the European Commission's own **impact assessment** on the 2040 target, the reduction in oil is between 150 Mtoe and 200 Mtoe depending on the scenario, meaning that **between $75 and $100 billion per year in oil could be saved - most of which would be imported**. This shift has already shown results: in response to Russia's war of aggression against Ukraine, in 2023, Europe avoided approximately €59 billion in fossil fuel import costs thanks to clean energy production, and investments in renewables reached nearly **€110 billion**.

At the same time, the road to a climate-neutral economy will lead to the creation of **numerous green jobs** **in different sectors**, from clean energy technologies to electric vehicles and charging infrastructure, sustainable construction, green fuels and circular economy.

Finally, with a strong 90% target, the EU will commit to stay the course for climate neutrality, **deliver the Paris Agreement** and continue engaging with the international community to cut emissions worldwide.

1. Adopt an EU climate target of at least a 90% cut in domestic net greenhouse gas emissions by 2040

Europe is the **fastest-warming continent** in the world. The worsening **triple planetary crisis** (climate change, pollution and biodiversity loss) needs immediate and decisive action. The **European Green Deal** and the **"Fit for 55" package (Ff55)** set the path for the deep transformation that the EU economy must undergo to become genuinely sustainable and boost energy security and competitiveness. The EU can only remain on track for the intermediate 2040 target and the 2050 climate-neutrality goal if the legislative framework for achieving the 2030 climate and energy objectives is strengthened and fully implemented.

T&E calls for an EU climate target of **at least a 90% reduction in domestic net greenhouse gas emissions by 2040** (compared to 1990). Starting from 2036, to increase the fairness and equity of its contribution to global mitigation, the EU could consider including within its domestic net 90% target the acquisition of a **limited amount of high-quality, high-permanence international carbon credits characterised by stringent eligibility criteria**. These should be considered only after a **detailed impact assessment carried out by the Commission** outlining the risks and benefits of a possible limited contribution of credits towards the 2040 target. They should support partner third countries in pursuing greenhouse gas (GHG) reduction trajectories compatible with the Paris Agreement's objective of holding the increase in the global average temperature to well below 2°C and of pursuing efforts to limit it to 1.5°C above pre-industrial levels. They should be used cumulatively over the period 2036-2040.

The Commission should adopt a legislative proposal outlining **stringent eligibility criteria for international carbon credits, as well as guidelines for their purchase by Member States**. Key eligibility criteria should include a guarantee that the EU and third countries purchase and use credits that contribute to GHG emission reduction targets compatible with the Paris Agreement's objective to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels. Moreover, the projects underpinning those credits should put in place transformative activities, while the net removal benefits generated by these credits should be measurable, verifiable, transparent, and **respect human rights**. **If these stringent criteria cannot be guaranteed, international carbon credits should not form part of the EU's target.**

Having said that, while Article 6 of the Paris Agreement introduces new rules intended to create credible systems for both offsetting and international carbon markets, experience to date highlights **serious challenges**. A key concern is double counting, where the same carbon credits

are claimed by more than one actor. Additionally, empirical evidence has shown that **carbon credits have not brought the expected results in the past**. Between 2008 and 2020, companies covered by the EU Emissions Trading System (ETS1) were permitted to purchase international credits, and more than 1.6 billion were used and problems arose. **Many of the underlying projects failed to deliver genuine emissions reductions**, and **some were linked to fraud, too**. The abundance of cheap credits also lowered the EU carbon price, making it easier for companies to continue polluting and slowing down domestic emissions cuts. In light of these shortcomings, the EU decided to stop accepting international credits after 2020.

As a reminder, the ambition of a 90% net reduction target for 2040 is not only supported by the Commission's own **impact assessment**, which does not consider the role of international carbon credits, but also by the European Scientific Advisory Board on Climate Change (ESABCC), which has recommended a **90-95% net target for 2040** that should not include international credits. Also, the 90% net target is enshrined in the **Clean Industrial Deal** (CID) and in the **Competitiveness Compass**.

Moreover, the **exclusion of carbon credits from the EU ETS1 is crucial** for the achievement of the target, as they would represent **a threat to the EU's domestic climate ambition and international credibility**.

An ambitious intermediate 2040 EU climate target is fundamental to accelerate and deepen the process started with the **European Green Deal** and **provide long-term planning and investment certainty for people and businesses**. A strong, science-based target would also ensure a **just and socially fair transition for all**, especially for those **vulnerable groups that are the most negatively affected by the effects of the climate crisis**.

Importantly, a solid 2040 target is key both to ensure an ambitious updated **EU Nationally Determined Contribution (NDC) to the Paris Agreement** ahead of COP30, and for the **EU's climate policy architecture beyond 2030.**

2. Define a realistic split between emissions reductions and carbon dioxide removal

Whilst the Commission's initiative acknowledges that "*priority should be given to domestic reductions in greenhouse gas emissions, complementing it by increased removals*", the 2040 target should define a **realistic split between reductions and removals to enhance clarity and minimise overreliance on unproven carbon removal technologies**. Given the technical and cost uncertainties surrounding engineered removal technologies, this split should be set at the lower end of what is currently assessed to be possible, and as the technologies are deployed this split can be revised based on empirical performance and cost data. Further, the use of carbon removals should be explicitly defined for use within hard-to-abate sectors.

Carbon removals cannot be considered as an alternative to mitigation because their inherent characteristics don't make them equivalent to emissions reduction. Research shows that the climate does not respond symmetrically to emissions and removals. Because of the non-linear

behaviour of the Earth system, the **climate impact** of emitting one tonne of carbon cannot simply be neutralised by removing one tonne of carbon from the atmosphere. This applies to both nature-based removals and CDR technologies. Moreover, all land-use removals are reversible due to human activities and force majeure events (such as fires or droughts), while the permanence of technological carbon removals also remains uncertain.

The potential deployment of carbon removals remains limited and uncertain, due to several environmental, economic, social and technological constraints, and cannot replace the deep emissions cuts needed to align with the 2050 climate-neutrality goal, as reiterated by the **estimates** of the ESABCC. According to their scenarios, after applying environmental risk thresholds, the maximum deployment of LULUCF removals was estimated at about 273-422 $MtCO_2$/yr by 2040, while the maximum removal potentials from bioenergy with carbon capture and storage (BECCS) and direct air carbon capture and storage (DACCS) accounted for 48-179 $MtCO_2$/yr by 2040. Similarly, the **Commission's impact assessment** calculated up to 400 $MtCO_2$/yr by 2040, consisting of 317 $MtCO_2$/yr from LULUCF net removals and 75 $MtCO_2$/yr from industrial removals.

The balance between emissions reductions and removals must be clearly defined to avoid an overreliance on engineered carbon removal offsets, which may not fully materialise. This balance can be revised over time as such technologies are deployed and more evidence of their effectiveness becomes available.

3. Decarbonise the transport sector to reach the 2040 EU climate target

Achieving the **maximum emissions reduction of the transport sector**, the largest portion of the GHG emissions and the only sector that has seen its emissions increase since 1990 in the EU, is of the utmost importance for an ambitious 2040 climate target.

T&E's **Road to Zero scenarios** show that **the transport sector can cut its emissions by about 70% by 2040 compared to the 1990 baseline**. This emissions reduction would make a 90% reduction in domestic net greenhouse gas emissions by 2040 (compared to 1990) possible.

Our **research** shows that the Ff55 policies for transport would deliver on a 30% reduction in 2040 compared to the 1990 baseline (see Figure 1). Owing to transport's increase in emissions since 1990, **the Ff55 policies would not bring transport emissions below their 1990 levels in 2030.** Our findings highlight that the Ff55 package would halve road transport emissions compared to 1990. However, **aviation and shipping emissions would increase by 13% over the same period**, decreasing by about a quarter from 2005.

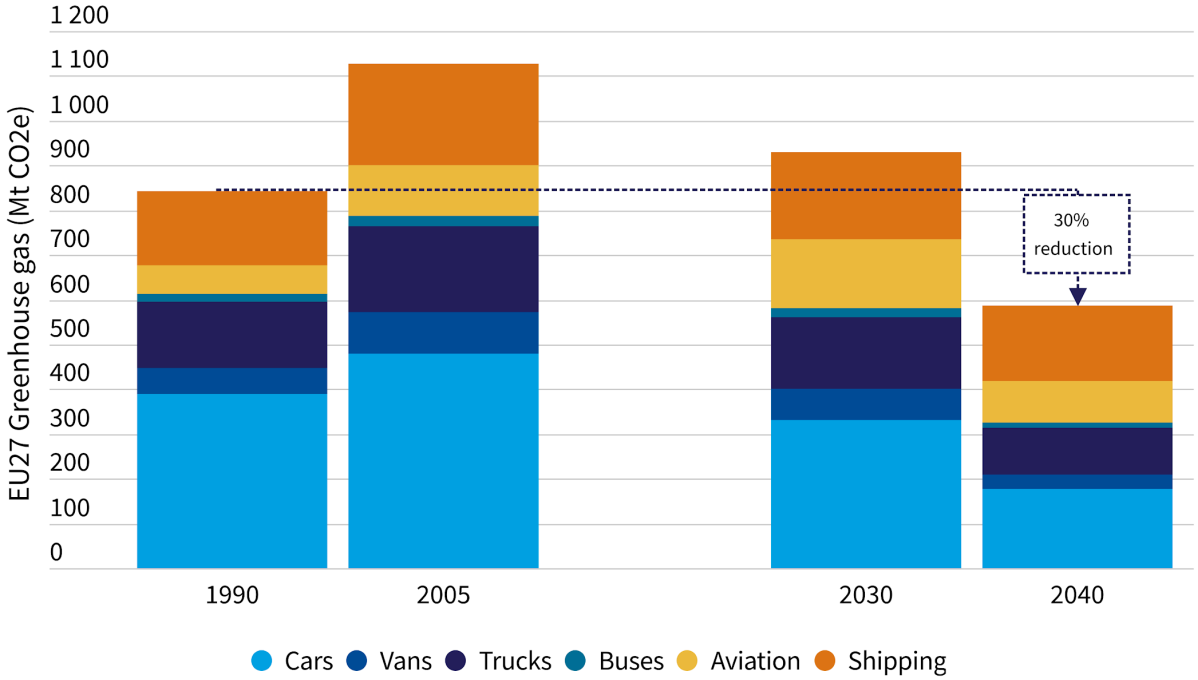

Figure 1: T&E transport modelling of Ff55 policy package

T&E's Road to Zero scenarios show that the **transport sector can cut its emissions by around 70% by 2040 compared to the 1990 baseline** (see Figure 2). Aside from the existing regulations, which mainly focus on accelerating electrification of road vehicles, as well as ReFuelEU Aviation and FuelEU Maritime (FEUM) which cover the aviation and shipping sectors respectively, we call for **transport system efficiency measures**.

Examples of the transport system efficiency targets across different modes include:

- **A 22% reduction of car activity**. This is assumed to be the result of road pricing via the ETS2, public transport expansion, reduced space for cars in cities, additional homeworking measures, car-free days, lower speed limits and a shift to public transport and cycling.
- **Halving corporate air travel, reducing elite flying (private jets and frequent flying) and placing a cap on leisure air travel** by prohibiting airport expansion.
- **Slow steaming of ships and a ban on fossil fuel imports**, resulting in the shipping sector's share of emissions that are linked to the transport of coal, oil, and gas to be phased out. In 2024, fossil fuels (petroleum oils, liquefied natural gas, natural gas in gaseous state and coal) accounted for **15.4% of the total EU imports by tonnage**.
- **Lowering speed limits (80km/h) for trucks on motorways**, as well as retrofitting of aerodynamic devices and more efficient tyres, and operational efficiency through the Eurovignette.
- **An increased rail freight and inland waterway freight share of activity**.

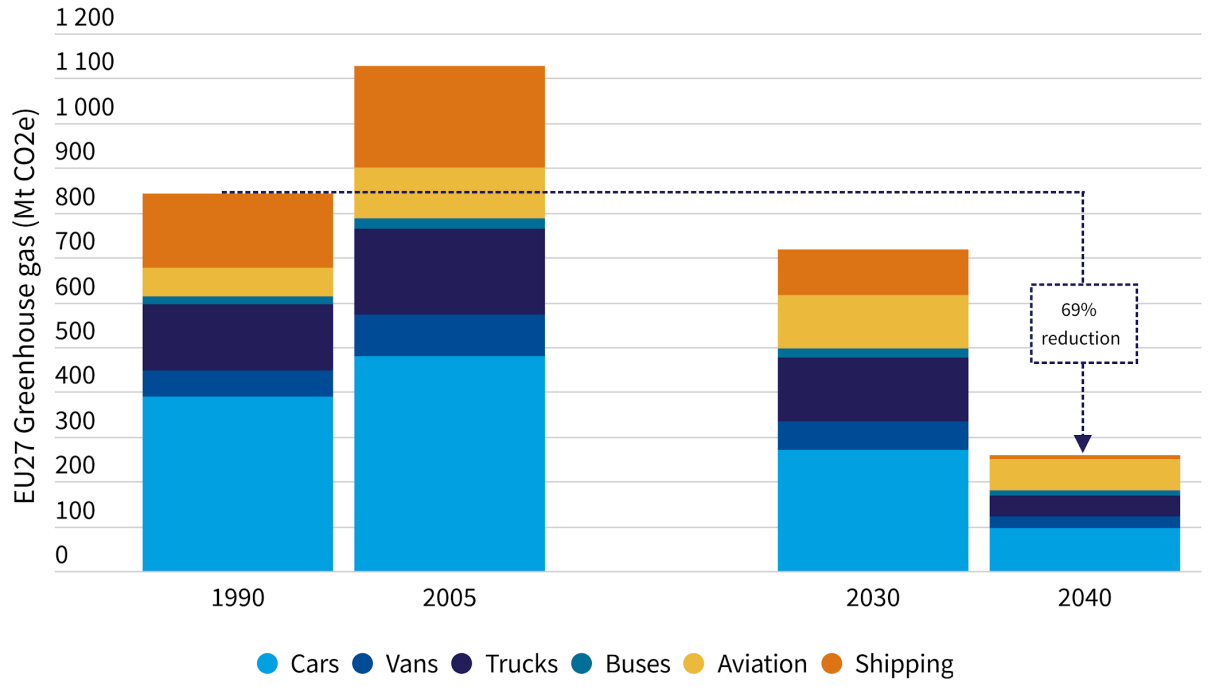

Figure 2: T&E transport modelling of Road to Zero scenario

To examine where our transport scenarios would get us in terms of economy-wide reductions, we used both the 1.5TECH and 1.5LIFE **scenarios**[1] for non-transport sectors from the Commission's **Clean Planet for All**. We then compared the results and included 51 $MtCO_2$ of CDR from the 1.5TECH scenario, which is the highest amount of all scenarios modelled by the Commission. On this basis, our scenario achieves 87% emissions reduction compared to 1990, while Ff55 would reduce emissions by 79% (see Figure 3). Based on more recent studies that assessed other sectors, we assume that more rapid emission reductions are possible in other sectors.

This leads us to recommend that the target of at least a 90% reduction in domestic net greenhouse gas emissions by 2040 (compared to 1990) is possible and feasible.

[1] These two scenarios aim at carbon neutrality, including LULUCF sinks, in 2050. The 1.5TECH scenario relies on the increasing contribution of all technologies by steep technology development, as well as on the deployment of biomass with carbon capture and storage (BECCS). The 1.5LIFE scenario relies less on these technologies and more on changes to consumption patterns and lifestyles.

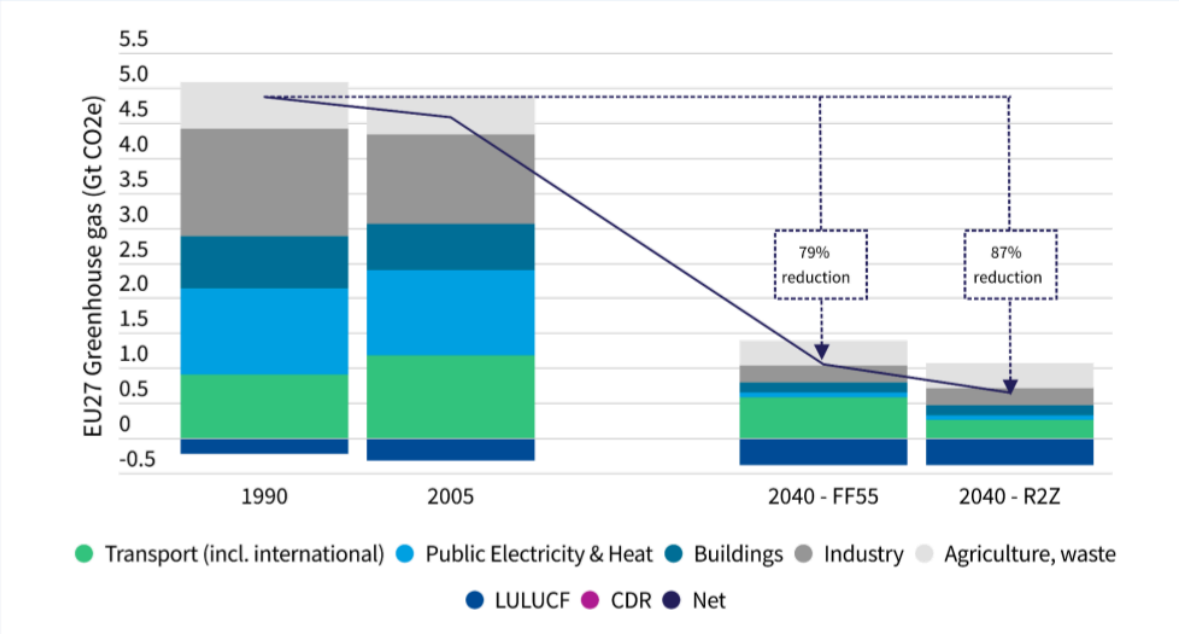

Figure 3: T&E transport modelling of Road to Zero scenario. CDR is graphically invisible.

For road transport, a life-cycle assessment (LCA) perspective clearly shows why **electrification is the only viable climate solution for cars**. Electric vehicles in Europe already emit more than three times less CO_2 than equivalent petrol cars when both production and use-phase emissions are taken into account. By contrast, **many crop-based biofuels are even worse for the climate than fossil fuels once the impacts of indirect land use change are included**. They also put pressure on food security and commodity prices, by diverting resources such as wheat, corn or vegetable oils away from food supply chains. Also, the "advanced" biofuels are available solely in very limited quantities and are best reserved for hard-to-decarbonise sectors. For cars, the evidence is clear: **biofuels cannot deliver the deep emissions cuts needed**, while **electrification offers a scalable and sustainable pathway** (see more: Fuels for cars: a dead end for industry, consumers and the environment).

4. Strengthen key measures to reach the 2040 target

An ambitious 2040 target is crucial for **Europe's transport sector which alone will account for about 45% of EU emissions in 2030**. To reach the 90% net target, the EU must resist pressure to weaken its 2030-2035 zero-emission cars target and **the ETS2, while maintaining green fuel targets for ships and planes.** It will also have to introduce ambitious measures to **electrify corporate fleets**, **tax the aviation sector, and strengthen truck CO_2 targets.**

For **cars,** the current **2023 car CO_2 regulation**, including the 2030 target and the 2035 internal combustion engine (ICE) phase-out, is the single most important emission reduction measure, as it will reduce **emissions by 57% in 2040 compared to 2015**. To achieve a 90% reduction in 2040, the EU will need to move beyond focusing solely on new sales and **clean up the entire car fleet**. The EU's 2040 strategy should focus on accelerated electrification via **corporate fleets**,

and account for scrappage schemes and e-retrofits, instead of relying on fuels for the legacy fleet. To accelerate the phase-out of the oldest ICEs, the EU could implement sales or circulation restrictions on used ICEs after a certain age. Finally, actions are needed to prevent the growth of car use by limiting new road building, shifting car use to other modes, and increasing car occupancy.

In 2027, the EU will introduce the **ETS2**, which will levy a carbon price on diesel, petrol and heating fuels. The ETS2 is essential to meet the EU's climate objectives, which cannot be achieved without putting a price on carbon emissions. The total number of allowances available is capped and gradually reduced each year, aiming for a **43% reduction in emissions by 2030 compared to 2005 levels**. In a **recent report**, T&E has calculated how a **targeted spending of the ETS2 revenues** generated by Member States could boost the green and just transition, therefore **reducing emissions and contributing to the achievement of the 2040 target.** If the carbon price were to be consistent at €55/tCO2 (inflation-adjusted reference price of €45/tCO2), the ETS2, including the Social Climate Fund (SCF), will represent **almost €300 billion in revenues between 2026 and 2032**. At EU level, road transport represents about 58% of total ETS2 emissions. T&E therefore recommends spending around half of the budget available, at least during the first years, for **investments on social transport measures that would significantly reduce road transport emissions.**

A strong 2040 target cannot be achieved without **electrifying corporate fleets**. T&E welcomes the reference in the 2040 target's proposal to the upcoming initiative to **Decarbonise Corporate Fleets**. In **our analysis**, we observed how shippers can drive the transition to zero-emission trucking and call upon the Commission to **set zero-emission (ZE) procurement targets on large shippers**, rather than truck operators. Despite accounting for only 0.2% of EU companies, large companies with more than 250 persons employed generate over half of the net turnover. Strong ZE procurement targets for large shippers have the potential to drive zero-emission truck (ZET) uptake, provide demand certainty to truck manufacturers and charging providers, and support transport companies in their transition.

Furthermore, to meet the EU's 2040 climate targets and ensure a fair, effective decarbonisation of the shipping sector, **the EU ETS1 must be preserved and strengthened, while making necessary alignments alongside the International Maritime Organization's Net Zero Framework (IMO NZF).** The IMO NZF, expected to be adopted in October 2025, represents the first global climate framework to significantly reduce emissions from international shipping. However, if fully implemented as agreed, it will still miss the IMO's own climate targets under the 2023 GHG Strategy, as well as the **EU's forthcoming 2040 economy-wide 90% emission reduction climate target**. This necessitates the Ff55 legislation to go beyond the IMO NZF's ambition. **Carbon pricing under the ETS has an essential role to play in capping and pricing emissions unabated by the IMO**.

In parallel, **the EU ETS for aviation must also be reformed to help meet the 2040 target**. Currently, the carbon pricing scheme for aviation only prices emissions on intra-EEA flights. T&E **analysis** shows that the EU ETS covered only 64 $MtCO_2$ emissions in 2024. If the EU and UK ETS

were applied to all departing flights, more than 100 supplementary $MtCO_2$ emissions would have been covered. Taking this and free allowances into account, 70% of CO_2 emissions were not covered by European carbon markets. The scheduled review of the legislation in 2026 is a chance to address this deficiency and **expand the scope to all departing flights and therefore apply carbon pricing to a larger portion of European aviation emissions.** These flights should be included in the scope of the 2040 target, T&E says.

Other measures to increase the taxation of the aviation sector include the introduction of a **kerosene tax** (via the Energy Taxation Directive), a **VAT on international aviation** that is under consideration for the **VAT package for travel and tourism**, or ambitious ticket taxes at national level. These must all be considered as part of the 2040 target.

Green fuel mandates for aviation and shipping (RefuelEU Aviation and FuelEU Maritime) must not be weakened and the targets must stay in place. In addition, the EU should put in place **public financing mechanisms** to support the most sustainable aviation and shipping fuels (e-fuels) to ensure the mandates are reached.

5. Include non-CO_2 aviation effects in the climate policy architecture

It is estimated that non-CO_2 aviation effects represent **at least half of aviation's climate impact**. These effects were recognised by the **IPCC** over 25 years ago. Yet, **there is hardly any legislation regulating non-CO_2 aviation effects in the EU or worldwide. We must both address aviation's CO_2 and non-CO_2 effects if we are to effectively reduce aviation's overall climate footprint.** Even if we meet our GHG emission reduction targets, **contrail warming and other non-CO_2 aviation effects must also be mitigated to stay on track with the Paris Agreement's temperature goals**. Crucially, research in the area shows that **mitigation solutions** can be deployed at scale in the coming decades, especially for contrails. The EU's action to reach climate neutrality by 2050 and its 2040 goals should therefore incorporate and strengthen the mitigation of CO_2 and non-CO_2 GHGs from aviation.

This is possible via different legislative avenues:

- **By integrating non-CO_2 aviation effects in the EU ETS**: since January 2025, the EU requires aviation's non-CO_2 emission data collection through a Monitoring, Reporting and Verification (MRV) scheme under the ETS1. Although the geographical scope of the MRV was regretfully reduced to EEA-only for 2025 and 2026, it remains a key tool for better understanding and measuring non-CO_2 aviation effects. **The automatic expansion of the scheme to full scope in 2027, as intended in the EU ETS, is pivotal.** By the end of 2027, the Commission is expected to deliver a report on the results of the MRV and, if appropriate, to make a legislative proposal to address non-CO_2 aviation effects. Addressing non-CO_2 aviation effects under the ETS (and in other legislative texts relating to climate and aviation) will be key to climate mitigation.
- **By adapting the European Air Traffic Management (ATM) for contrail avoidance**: the current European ATM system must be modernised and adapted to support

contrail-avoiding operations. This could involve updating the environmental and climate (K)PIs of the Single European Sky II+ Charging and Performance Scheme to include non-CO_2 emissions and updating the ATM Masterplan with concrete actions on contrail avoidance.

A final, possible legislative avenue is the **inclusion of contrails and non-CO_2 GHG emissions in climate targets** (such as the **NDCs** and the EU's climate targets).

Additional climate targets must ensure appropriate levels of coverage in both setting direct reduction targets and ensuring the polluter pays principle (PPP). **The Commission must account for non-CO_2 emissions and mitigation measures for the 2030–2050 GHG budget, the 2040 target, and the design of policy tools to meet EU climate goals.**

The European Climate Law indicates a clear aspiration for the EU to support the global temperature goals enshrined in the Paris Agreement. In light of growing scientific consensus on harmful impacts of non-CO_2 GHG effects, failure to include them undermines the aspiration of the law and is out of kilter with the science. But both the 2040 and the 2050 targets take the form of emission reduction targets by **reference to a closed list of GHGs**. This list mirrors the non-CO_2 GHGs defined in the **Kyoto Protocol**, rather than the more expansive definition found in the United Nations Framework Convention on Climate Change (**UNFCCC**). No obligation currently exists to include climate forcing agents such as water vapour, NOx, sulphur dioxide or soot particles within the 2040 target. Therefore, we advocate for the **inclusion of a hard-edged legal obligation for the 2040 target** to address these emissions in the text of the European Climate Law to indicate that it also refers to non-CO_2 GHG aviation effects. This can be done in two ways:

1. By **amending Article 1 of the European Climate Law** to indicate that the binding climate objectives set out in the Regulation do not refer exclusively to the closed Annex V List. A definition of non-CO_2 aviation effects for EU legislative purposes already exists at **Article 3(v) of the EU ETS Directive**, as amended, and the European Climate Law could refer to this definition in addition to the Annex V List in amending the scope of the Regulation under Article 1.
2. By **amending the Annex V List itself** to include nitrous oxides other than N2O, sulphur dioxide, and water vapour from aircraft exhausts and contrails. This could be done via a delegated act of the Commission but only in accordance with a decision adopted by the Parties to the UNFCCC and the Paris Agreement (Regulation 2018/1999, Article 26(6)).

Conclusion: looking ahead

The **scientific consensus** clearly states that to prevent irreversible climate change we must drastically reduce emissions and phase out fossil fuels. The 2024 European State of the Climate (ESOTC) **report** reiterates that action to avoid irreversible damages to the environment, the ecosystems and human habitats must be intensified. In this context, the EU and its countries with higher historical responsibility and capability to act are required to act faster.

With the US abandoning the Paris Agreement, the EU needs to **lead by example** by putting in place a **solid, ambitious 2040 climate target and the updated EU NDC**. T&E calls for a target of **at least 90% reduction in domestic net greenhouse gas emissions by 2040 (compared to 1990).** Starting from 2036, the EU could consider including within its domestic net 90% target the acquisition of a limited amount of high-quality, high-permanence international carbon credits, characterised by stringent eligibility criteria.

Decarbonising the transport sector is central to this effort. T&E's Road to Zero scenarios demonstrate that **a 70% cut in transport emissions by 2040 is feasible** by accelerated electrification, efficiency measures, and systemic shifts in how people and goods move. **The achievement of this transformation is a prerequisite for meeting a 90% net climate target by 2040.**

Moreover, delivering on a robust 2040 target will require decisive measures across key sectors, from **preserving the ETS1 and ETS2 to maintaining 2030-2035 zero-emission cars targets, electrifying corporate fleets, taxing aviation fairly, and strengthening CO_2 standards for trucks, ships, and planes.** Taken together, these actions will not only protect Europe's climate ambition and credibility but also enhance its energy security, reduce dependence on fossil fuel imports, and strengthen the EU's economy.

Further, we highlight that an EU comprehensive climate policy must **also include non-CO_2 aviation effects**. Current legislation neglects these impacts, despite the well-documented warming effects of contrails and methane emissions. Including non-CO_2 gases, especially contrails, in the European Climate Law's scope is essential to ensure credibility, uphold the PPP, and align with the regulation's commitment to the Paris Agreement's temperature goals.

Equally important is **maintaining the integrity of emission reduction targets by defining a realistic split between emissions reductions and carbon dioxide removal**. While removals may have a role to play in managing residual emissions in the longer term, they cannot substitute for deep, climate mitigation targets. Overreliance on removals would introduce risks, from impermanence to ecosystem trade-offs, and weaken the clarity of Europe's climate ambition. **Specific frameworks for removals are needed to complement, not dilute, binding reduction targets.**

Further information

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