EU Governance for CO2 Removals in EU law: What could a removal target look like?

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What we have (almost)

• **Combined** target for climate neutrality by 2050
  • Legally binding – if EU Climate Law is adopted
  • Collective target for EU – if adopted as COM proposed

• **Combined** target 55 % by 2030 including reductions *and* removals – if adopted as COM proposed

• No-debit target LULUCF
What we don’t have

• No separate EU removal target
  • No clarity / quantification of climate neutrality
  • 2050 climate neutrality through 100 % reductions and no CDRs or 80 %, and 20 %?

• Only collective EU target, no MS targets?

• No sufficient LULUCF target

• No legally binding nature restoration target
Why is this a problem?
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• Combined targets obscure that
  • Removals and reductions are fundamentally different:
    • No full substitution: 1 CDR ≠ 1 AEA or 1 EUA
    • No better sink than oil, gas, and coal in the ground
    • Verification and compliance
  • Where to invest and research: reductions or/and removals?
  • Responsibilities for reducing emissions and increasing removals
  • CDR options play a role for achieving temperature goals already before 2050
  • Removals are different: some are sustainable, proven, affordable, permanent, some not so much (yet).

• LULUCF no debit rule insufficient
• Non-binding nature restoration goals ineffective
What is the solution?

**EU climate targets**
for 2030, (2040) and 2050, in ECL: separate, legally binding, quantified, enforceable

**Emissions reduction target**
minimum of x Gt and / or y % (compared to 1990)

**Separate climate targets for Member States**, replicating the EU target design, taking account of national circumstances

**CDR target**: maximum of x Gt or y % of overall EU climate efforts, primarily through ecosystem restoration but open to other eligible CDR concepts.
Thank you!
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What are the other options?

• ETS, Climate Action Regulation:
  • CDRs and AEAs / EUA are distinctively different
  • Separate schemes, including trading.
  • Discount factors to address this problem, e.g. 10 CDR units equal an AEA or EUA.

• Involving MS
  • Quantified non-binding reference values
  • MS pledge system