

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
- <u>Combined</u> target 55 % by 2030 including reductions <u>and</u> removals – if adopted as COM proposed
- No-debit target LULUCF





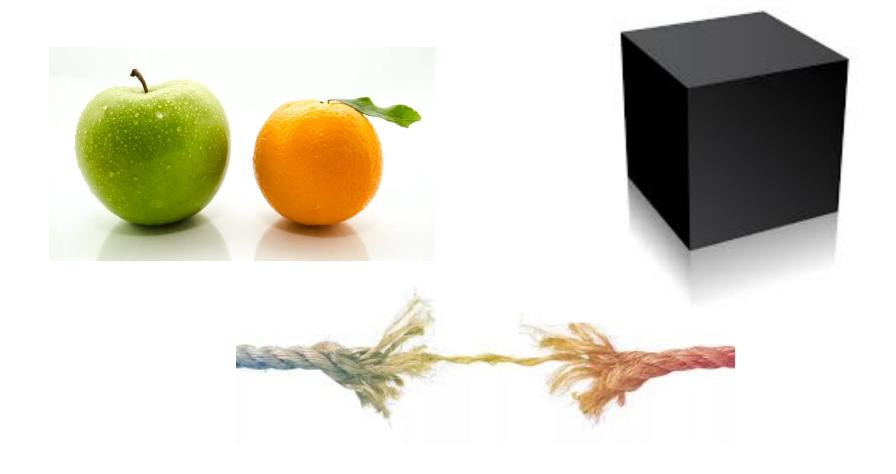
What we don't have

- 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 probler ?

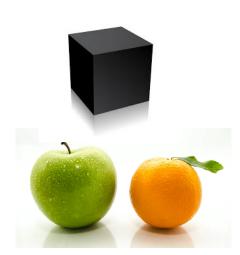




Why is this a problem?

- 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)

CDR target:

maximum of x Gt or y % of overall EU climate efforts, primarily through ecosystem restoration but open to other eligible CDR concepts

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



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