

**To: Environment Ministers of EU Member States**

**Cc: Commission President, Executive Vice-President for the Clean, Just and Competitive Transition, and Commissioners for Environment, Water Resilience and a Competitive Circular Economy, Climate, Net Zero and Clean Growth, Energy and Housing, Health and Animal Welfare and the Chair of the European Parliament Environment Committee**

## **Meeting of the EU Environment Council Meeting on 4 November in Brussels – recommendations from environmental citizens organisations**

Brussels, 30 October 2025

Dear Minister,

On behalf of the European Environmental Bureau, Europe's largest federation of environmental citizens organisations, we are writing to share our recommendations ahead of the forthcoming EU Environment Council.

A few days ago, UN Secretary-General António Guterres stated that **humanity will not be able to keep global warming below 1.5°C** in the near term. The last decade has already been the warmest on record, with 2023 and 2024 being the hottest years ever recorded. He warned that “overshooting is now inevitable”, with **devastating consequences such as triggering tipping points** in the Amazon, the Arctic and oceans. The recent European Environment Agency's (EEA) report indicates that between 1980 and 2023 weather- and climate-related extreme events caused over 240,000 premature deaths and EUR 738 billion damage in the EU-27. Guterres emphasised that the longer emissions remain high, the greater the risk of irreversible damage. A new UN report analysing updated national climate targets (NDCs) also shows some progress, but **not at the speed or scale needed to meet the Paris Agreement goals**. Simon Stiell, Executive Secretary of UN Climate Change, said the world is entering a “new era” of climate action, but “we have a serious need for more speed” and fairness in implementation.

A stark reminder of the urgency comes from this week's devastation from [hurricane Melissa](#), one the most powerful hurricanes ever measured in the Caribbean. 80-90% of roofs were destroyed in Jamaica. The category 5 storm also led to mudslides and many deaths. Jamaica's Prime Minister Andrew Holness lamented the "total devastation" of the country. In Haiti, twenty people lost their lives, including ten children. Cuba, the Bahamas and other countries have been struck too. These types of impacts will not be one-off freak events, or once-in-a-century disasters, but a constant threat and warning of what not tackling climate change implies to human lives and communities.

These warnings come just before the **COP30 climate summit in Brazil**, where countries are expected to present stronger commitments and strategies to reduce emissions and adapt to climate impacts. The **EU's leadership is paramount** to the success of COP30. The EU's current trajectory is **not yet fully compatible** with limiting warming to 1.5°C: an ambitious 2040 target, and its rapid

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implementation can help close this gap. Delays in formalising the 2040 target have raised **questions about the EU's leadership and lack of urgency**. What we need is a **science-based climate target for 2040**, and an **ambitious Nationally Determined Contribution (NDC) for the EU** as a key element to propel the EU to assume a leadership role at the global level, and to ensure momentum at COP30.

We invite you to take our concerns into account during the final preparations as well as at the Council meeting itself.

### 1. European Climate Law amendment

Being responsible for around one-fifth of total global CO<sub>2</sub> emissions since the Industrial Revolution and as one of the wealthiest regions globally, the EU has a responsibility in setting a credible path to drastically cut climate-altering emissions - keeping the increase in global warming to below 1.5°C by the end of the century.

As shown in our [Paris Agreement Compatible \(PAC\) scenario](#), the EU can and should achieve climate neutrality by 2040. It is not only technically feasible, but also a wise investment. If Europe had increased decarbonisation efforts a decade ago, it could have unlocked at least €1 trillion in direct benefits by 2030. The faster fossil fuels are phased out, the more energy security and economic gains Europe stands to achieve (please see the Paris Agreement Compatible (PAC) scenario's [executive summary](#) prepared by CAN Europe).

The Commission's amendment proposal to the European Climate Law lacks the appropriate levels of ambition, contradicting both the Commission's own Impact Assessment and the [advice](#) of the European Scientific Advisory Board on Climate Change (ESABCC). By upholding a strong position in Council discussions, you have a chance to align this key piece of EU legislation with the most compelling scientific evidence, making EU climate action a vector of increased health and economic benefits.

***We call upon the Environment Council to:***

- **Agree on an ambitious domestic EU target of at least 90% net emission reduction by 2040** – heeding the calls of science, of [civil society organisations](#) and of [thousands of European citizens](#).
- **Introduce three separate targets for gross emissions cuts, industrial removals, and nature-based sequestration** – ensuring clarity and transparency.
- **Exclude the use of international carbon credits** (Art. 6 of the Paris Agreement) – aligning with the calls by the [ESABCC](#) and [civil society](#).

### 2. EU submission of an updated Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC)

Far from being the climate leader that the world needs after the exit of the US, the EU is now in the embarrassing situation of lagging behind in submitting its NDC. The EU must show leadership by setting an ambitious NDC as soon as possible under the Paris Agreement ahead of COP30. This is the Union's responsibility as a historic emitter and wealthy region and can encourage other major emitters to take ambitious action on climate change. In its recent Advisory Opinion, the International Court of Justice also [made it clear](#) that to comply with the obligations under the Paris Agreement, the content of the NDC must be an “adequate contribution” to the achievement of the 1.5°C objective following

clear criteria, to be assessed in light of the principle of common but differentiated responsibilities and respective capabilities.

***We call upon the Environment Council to:***

- **Present an ambitious NDC at the UN Secretary-General's High-Level Special Event on Climate Action at COP30.**
- **Align the domestic EU NDC for 2035 with a robust – i.e. 90% or more net emissions reduction – 2040 climate target.** This translates to a more-than-linear target for 2035, as mitigation efforts will become more difficult as we move towards 90%. Hence, only an EU-NDC of more than 72.5% will be credibly compatible with 90% in 2040.

We understand that certain Member States are concerned about potential high prices in the EU's carbon pricing scheme for transport and heating, the Emissions Trading System 2 (ETS2). We have [analysed the proposals](#) for a reform of the Market Stability Reserve of the ETS2. While we welcome the Commission's announcement of concrete proposals for early auctions and frontloading of revenues from ETS2, we are concerned that announced proposals to reform the Market Stability Reserve will lead to significant increases in emissions from ETS2. Forecast high prices signal persistent high demand for emissions. Increasing the supply of allowances cannot be the answer. Technological solutions in these sectors are available, national-level policies to support electrification are essential, and national carbon floor prices in wealthy countries can help stabilise ETS2 prices without increasing emissions.

Finally, we are concerned that the commitments to tackle the climate crisis are not reflected in the EU budget. In the MFF proposal, the 30% climate spending target risks not providing sufficient funding to drive decarbonisation, depollution and nature restoration across the Union. Under the last MFF, 30% were earmarked for climate and environment, with a separate target for biodiversity. The new 30% target represents a reduction in spending, with the risk of leaving biodiversity and nature restoration aside. The latter is, however, a key tool to protect and enhance carbon sinks such as peatlands, and to create cost-efficient and nature-positive protections against climate risks, such as flood plain restoration.

The proposed funding amounts are neither adequate nor proportionate to the scale of the climate crisis. Additional funding is needed both for mitigation and adaptation. On adaptation, this requires funding for nature restoration to support ecosystem and climate resilience. Without the LIFE Programme and without ringfencing nature funding, there is a very real risk that there will be insufficient funding for nature-based solutions for climate resilience, undermining human security.

We thank you in advance for your attention and we remain available to discuss with you these practical visions and look forward to working together to create an agenda of hope and progress.

Yours sincerely,



Patrick ten Brink  
Secretary General



Patrizia Heidegger  
Deputy Secretary General