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EU land-use sector needs a realistic and indicative climate goal

The land-use sector provides Europe with sustainable biomass that can substitute fossil or carbon-intensive products, materials and energy, also contributing to the transition to a circular and climate-neutral bioeconomy, in accordance with the EU Climate Law and the objectives of the EU Bioeconomy Strategy.

In Europe today, emissions covered by the EU Emissions Trading System and the Effort Sharing Regulation amount to around 3 billion tonnes - roughly 15 times higher than the currently estimated LULUCF sink. Evidently, the post-2030 climate framework also needs to focus primarily on phasing out fossil emissions, while allowing the land sector to continue providing climate solutions.

To achieve this, Europe needs **realistic and indicative LULUCF targets**, clearly separated from both emission reductions and permanent removals. While the outcomes in the land sector remain highly uncertain, also the political system at EU or national level possesses in fact a limited ability to control these outcomes, as the European Commission has pointed out in, for example, the Impact Assessment to the 2040 Climate target. Indicative targets with a sufficient level of flexibility enable the Member States to conduct active measures without getting stuck in uncertain projections.

This is not a technical nuance. It is basic reality: the LULUCF sink is to a large extent driven by weather and other natural factors, making its size inherently difficult to predict with precision. Nature cannot be adjusted in the way industrial, or energy production processes can.

In 2023, the reported LULUCF sink was 198 Mt, while the European Environmental Agency projects 199 Mt in 2040 with additional land use sector measures. This implies that, even with additional measures already planned by Member States, the 2040 sink would be “approximately equivalent” to the sinks reported today. Although numbers mentioned are highly unpredictable, it seems challenging, if not impossible altogether, to increase future carbon sinks in the land-use sector.

The Impact Assessment accompanying the 2040 climate target is partly outdated, but its analysis remains valid. It clearly indicates the high uncertainty of the future LULUCF sink. The projected range spans from under 100 Mt to around 300 Mt in 2040 (Impact Assessment on the 2040 Climate Target, p. 134). Similar ranges are reflected in national projections from several Member States.

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In practice, LULUCF policy is being developed under significant uncertainty. Main risk lies in setting overly high binding expectations for the land sink. This could both weaken the focus on fossil emission reductions and create a climate framework that does not add up in practice. At worst, it places unnecessary pressure on the land use sectors including agriculture and forestry, essential for supplying renewable raw materials to the bioeconomy.

With the information available today, an indicative LULUCF-target could be set between 100 and 150 million tonnes, but to be practically feasible it needs to be built up from the Member States' own projections, granted that the competent authorities have the capability of doing relevant projections.

Finally, we stress that the voluntary Carbon Removal Certification Framework (CRCF) should not be linked to climate framework obligations as a KPI or activity-based target. It was negotiated as a voluntary instrument and must remain so. It is still highly uncertain whether the delegated acts and draft measures presented so far will strengthen carbon sinks in forests or wood products. The methodologies are narrow in scope and complex, and any real incentive for businesses or landowners remains unclear. If the Commission plans to incorporate CRCF into the climate framework, the delegated acts on carbon removal certification should first be reassessed from this perspective.

Europe needs a stronger, thriving bioeconomy to help achieve its goals of overall competitiveness and resilience, and we look forward to supporting the Commission in delivering these objectives.

Paula Lehtomäki

Chief Executive Officer
Finnish Forest Industries Federation

Viveka Beckeman

Director General
Swedish Forest Industries Federation

Henrik Välja

Chief Executive Officer
Estonian Forest and Wood Industries
Association

Sigrid Eckhardt

Managing Director
Austropapier – Association of the Austrian
Paper Industry

Dieter Lechner

Deputy Managing Director
Association of the Austrian
Wood Industries

Artūrs Bukonts

Executive Director
Latvian Forest Industry Federation