

Swedenergy's feedback on public consultation for 'National targets and flexibilities in the EU climate policy framework after 2030 – review'

The European Commission reviews how the EU climate policy framework should be designed for the period after 2030, in line with the political agreement on a binding 2040 target of a 90% net reduction in greenhouse gas emissions compared to 1990 levels. During 2026, the Commission gathers views through public consultation on different policy options related to the setting of national climate targets compatible with the EU 2040 target.

Summary

Swedenergy generally welcomes the ambition to establish a clear, long-term and predictable climate policy framework that provides stable planning conditions for companies, investors and member states. At the same time, the post-2030 framework must be simple, cost-effective and flexible, and designed so that climate action, competitiveness and security of energy supply reinforce each other. Experience with the current framework shows that governance needs to be better aligned with how different sectors operate and with the instruments already in place at EU level.

Swedenergy:

- Highlights EU ETS 2 as a central pillar post-2030 and calls for a review of national effort-sharing targets to avoid overlap and inefficiency.
- Underlines that emission reductions must remain the priority, with carbon removals used carefully and clearly differentiated by type and permanence.
- Supports flexibility mechanisms between member states, provided they preserve environmental integrity.
- Calls for strong integration of climate policy with EU energy, industrial and competitiveness policies, alongside investment incentives for key infrastructure.

Swedenergy considers it essential that all member states contribute to achieving the 2040 target, but that the distribution of efforts should be based on a combination of cost-effectiveness and solidarity, taking national circumstances into account. In this context, Swedenergy highlights the importance of the new emissions trading system for buildings and road transport (EU ETS 2), which will enter into force in 2028 and introduce an absolute emissions cap for large parts of today's effort sharing sectors. If the EU ETS 2 functions as intended, its role should be fully reflected in the post-2030 architecture, and the scope and design of national targets under the Effort Sharing Regulation should be reviewed to avoid overlapping or inefficient regulation.

Regarding carbon removals, Swedenergy underlines that both emission reductions and removals will be necessary to meet the 2040 target. However, the framework must maintain a clear distinction between nature-based and technological removals, as well as between permanent and non-permanent solutions. Shortfalls in emission reductions should not be compensated by increased ambition for the land-use sector. Domestic mitigation efforts should remain the priority, and

international carbon credits should only be used as a last resort, under strict safeguards to ensure high quality, credibility and robust monitoring, reporting and verification.