



Ursula von der Leyen

President of the European Commission

Maroš Šefčovič

Executive Vice-President

Wopke Hoekstra

European Commissioner for Climate Action

6th February 2024

Subject: Response to 2040 EU climate target proposal, methane must be addressed

Dear President Von Der Leyen,

Dear Executive Vice-President Šefčovič,

Dear Commissioner Hoesktra,

We, a coalition of non-profit organisations working on methane mitigation, are writing in response to the recent communication on *Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just, and prosperous society*. While we welcome the ambitious target of a net reduction of greenhouse gas by 90%, we are concerned at the removal of the proposed 30% reduction target for non-CO2 emissions in agriculture, present in earlier drafts of the proposal. Incorporating explicit targets and measures for reducing methane emissions, across sectors, is critical to ensure the proposal's success, including in agriculture - the largest source of the EU's methane emissions. We call on the European Commission to ensure this is included in future work.

Methane, responsible for a third of warming experienced today, is over 80 times more potent than carbon dioxide over a 20-year period. While carbon dioxide (CO2) remains in the atmosphere for centuries, methane's impact is significant over a shorter period, making immediate reductions crucial for near-term climate goals, as well as instrumental to prevent crossing irreversible tipping points. Addressing methane emissions can yield rapid and substantial climate benefits due to its shorter atmospheric lifetime and will be essential to prevent warming over 1.5 °C. Prioritising methane in its 2040 target is also an opportunity for the European Union to show its commitment to strengthening the Global Methane Pledge in the future, which sets a collective goal of reducing global methane emissions by 30% by 2030.

To deliver on the 2040 climate target, the pathway should include methane mitigation as a central component, with specific measures across sectors:

First, the pathway should include a methane reduction target of at least 44% by 2040, reflecting the findings of the IPCC.¹ A methane target would set the baseline for mitigation measures, providing a clear objective to guide the measures adopted as well as ensuring effective resource allocation while establishing a reference point to track progress. Intermediate targets to reduce domestic methane emissions by at least 30% by 2030 must also be implemented across member states, as committed to in the Global Methane Pledge.

Second, to deliver on the target, specific mitigation measures should be included in the 8 building blocks for the agriculture, waste, and energy sectors. These must include urgent measures to support a shift towards healthier diets, comprehensive technical measures that respect animal welfare, food waste reduction, and mandatory mitigation measures on imported fossil fuels.

Third, to assess both implementation and overall progress, and as a tool to build strategies and prioritise highest-emitting sources and sectors, the 2040 pathway should prioritise methane monitoring and reporting. To date, methane emissions have largely escaped scrutiny from regulators, resulting in significant underreporting. In the agricultural sector in particular, the political window of opportunity must be used in the short and medium term to anchor ambitious methane reduction targets and accompany technical reduction measures as well as a dietary shift, for a future proofed policy.

The window to stay below 1.5 degrees of temperature increase is rapidly closing, and urgent methane reductions across sectors will be essential to ensure we avoid climate tipping points and see immediate reductions in warming. We hope to see this reflected in the future work of the next European Commission.

We would welcome the opportunity to discuss this matter further with you or your staff via an in-person or online meeting.

We thank you for your consideration of this matter.

Yours sincerely,

Nusa Urbancic, CEO, Changing Markets Foundation
Jürgen Resch, Executive Director, Deutsche Umwelthilfe e.V.
Mary Rice, Executive Director, Environmental Investigation Agency
Aline Maigret, Head of Policy, Zero Waste Europe

¹ IPCC (2023) *Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, H. Lee and J. Romero (eds.)]. Page 4.

Methane reduction measures to be included in the 8 building blocks:

In the agriculture sector, responsible for 53% of the EUs methane emissions,² comprehensive technical reduction measures must be accompanied by dietary shift and implemented as quickly as possible.³ This must be accompanied by specific reference to reduction of non-CO2 emissions, including methane in the 2040 target. This will better future-proof agriculture policy and ensure a just transition for farmers as well as measures to support vulnerable citizens impacted by food insecurity. Shifting diets would also ensure fairer and more sustainable land use, improved health, and reduction of other emissions associated with meat production, including CO2 and nitrous oxide. Reduction of food waste must also be seen as a benefit for action on climate, air quality and animal health, due to the reduction of unnecessary production. Carbon removal through soils alone will not be sufficient to offset the warming caused by ruminant emissions, with current data showing grassland carbon stocks would need to increase by 25-2000% globally to do this effectively at current emission rates.⁴

In the waste sector, as outlined in the latest European Scientific Advisory Board on Climate Change report, key initiatives to reduce food waste in the EU are still missing.⁵ Targets for ambitious food waste reduction in line with the SDG 12.3 must be included in the 8 building blocks of the 2040 target proposal to fill a central and ongoing policy gap on emissions reductions. Additionally, it is crucial to establish targets for separate collection of biowaste to prevent its disposal in landfills. The waste sector is responsible for 26% of the EU's methane emissions.⁶

In the energy sector, although the EU Methane Regulation establishes the foundation for methane mitigation in the oil, gas and coal sector, it doesn't include specific mitigation measures (leak detection and repair and limits to venting and flaring) on imported fossil fuels. Making up the largest share of emissions associated with EU fossil fuel consumption, we therefore call on the next Commission to push for an extended effort on mitigation across the entire fossil fuel supply chain, imports included.

² [European Commission, Factsheet Methane Strategy, October 2020](#)

³ [Deutsche Umwelthilfe e.V., Methane Mitigation in the EU's agricultural sector, 2022; Changing Markets Foundation, High Steaks: how focusing on agriculture can ensure the EU meets its methane reduction targets, 2023.](#)

⁴ [Wang et al., Risk to rely on soil carbon sequestration to offset global ruminant emissions, Nature Communications 14, Article number: 7625, 2023.](#)

⁵ [European Scientific Advisory Board on Climate Change, Focus on immediate implementation and continued action to achieve EU climate goals, January 2024.](#)

⁶ [European Commission, Factsheet Methane Strategy, October 2020.](#)