



ROYAL NORWEGIAN MINISTRY OF
CLIMATE AND ENVIRONMENT

The Minister

Commissioner for Climate,
Net Zero and Clean Growth,
Mr. Wopke Hoekstra

Your ref

Our ref
26/293

Date
8 June 2026

The EU climate policy framework after 2030 – comments from Norway

Norway refers to the public consultations from the European Commission regarding revision of national targets and flexibilities in the EU climate policy framework after 2030 and international carbon credits. The European Union and Norway have a close cooperation on climate policy. The development of the EU climate architecture is therefore important to Norway, and we thank the Commission for the opportunity to provide our input. Our views on the public consultation regarding national targets, flexibilities and international carbon credits are presented through the attached non-paper.

Key messages in our non-paper:

- The European Union and Norway have a close cooperation on climate policy. The development of the EU climate architecture is therefore important to Norway.
- Norway welcomes the EU's continued strong ambitions in the development of the EU climate policy architecture.
- Norway does not support national emission reduction targets covering all emitting sectors in the EU climate policy framework. National emission reduction targets should not include emissions covered by the ETS 1.
- All sectors and countries should continue to contribute in accordance with their respective capabilities. Norway supports differentiated national targets where countries with higher GDP per capita should assume more ambitious targets. Countries should have access to flexibility in meeting those targets to increase cost-efficiency. Norway welcomes that the Commission, when developing its proposal for a post 2030 climate architecture, will look at how to ensure greater flexibility to help states achieve their targets in the most effective way.

- The existing regulatory framework for LULUCF has revealed certain shortcomings. It is important that a new framework for the LULUCF sector takes these weaknesses into account. The LULUCF sector has unique characteristics which must be considered when defining targets for the sector. LULUCF is characterised by, inter alia, large natural fluctuations in annual removals and emissions of greenhouse gases, and technical difficulties in measuring and predicting said removals and emissions. Norway would also like to underline the need for a long-term approach in the LULUCF sector, especially when it comes to managed forest land. On the other hand, Norway believes that changes in land use change, especially reduced conversion from natural areas to settlement, could have significant impacts also in the short term.
- The sourcing of biomass from sustainably managed forests, and its subsequent use in BECCS, must be reflected in the ambition level and regulatory framework for the LULUCF sector beyond 2030, while keeping the ecologic integrity of the forest ecosystem.
- It is important to differentiate between temporary and permanent removals. Only permanent carbon removals should be linked to emission reductions and should be eligible to contribute to the ambitions in both the ETS 1 and the ESR. Norway supports the view that states – also before 2030 – should be allowed to use permanent carbon removals to fulfil their targets under the ESR. Permanent carbon removals should be included in the ETS post 2030.
- Norway has a long history of utilising market based cooperation with developing countries to safeguard the achievement of our climate targets. Norway encourages the EU to closely assess how it can involve the private sector in market-based cooperation with developing countries through Article 6, including to examine positive and negative sides of opening for credit use within the ETS 1.

Our views on the public consultation regarding the ETS post 2030 were presented in our letter of 8 July 2025.

Norway welcomes the EU's continued strong ambitions in the development of the EU climate policy architecture. In the upcoming legislative proposals, it is important to ensure predictability and long-term investment certainty, inter alia in order to reduce risks for market actors that have already made investment decisions. Norway is looking forward to the opportunity to comment on the Commission's draft post 2030 climate legislation expected in Q3 2026 (ETS) and Q4 2026 (climate policy framework) and we stand at the Commission's disposal should there be any need for input during the Commission's work to prepare the draft legislation.

Yours sincerely



Andreas Bjelland Eriksen