



Corporate
Leaders Group
Europe



Roots revival: Why nature-based carbon removals are a key opportunity for Europe

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Executive summary

Europe's economy is deeply dependent on healthy ecosystems, and the European Union recently committed to sustaining its ambition to reduce its emissions to be on track with carbon neutrality by 2050. These climate and nature targets are mutually dependent.

With over 80 per cent of protected habitats in poor condition, widespread soil degradation and growing water stress, the continent's economic stability, food security and societal resilience are at stake. Businesses and financial institutions are already exposed. A significant share of corporate debt is vulnerable to nature-related disruption, reinforcing the need for credible strategies that strengthen both climate and nature outcomes. These challenges demand coordinated action across sectors, linking corporate leadership with clear policy frameworks and investment signals.

As a cross-sector group of leading companies, CLG Europe brings this business perspective into the debate, helping to shape practical approaches that strengthen both climate delivery and nature recovery. Nature-based carbon removals (NbCR) offer a critical tool – alongside rapid emissions reductions – to help close the gap between current climate trajectories and the EU's 1.5°C commitments. While not a substitute for decarbonisation, NbCR can address residual emissions in hard-to-abate sectors and deliver substantial co-benefits for biodiversity, climate adaptation and local communities. They are proven, scalable, relatively low-cost and politically palatable compared to engineered removals.

The policy landscape is shifting: the EU's 2040 climate target (90 per cent emissions reduction) and the Nature Restoration Law create both opportunities and pressures for high-integrity removals. The EU also recently adopted the Carbon Removal and Carbon Farming Regulation (CRCF), which sets quality criteria and monitoring processes to facilitate sustainable investment in carbon removals and address risks of greenwashing. As Europe seeks competitiveness in a global clean-tech race, sustainable land-use sectors – agriculture, forestry, fisheries – are increasingly strategic. Leading European companies already integrate NbCR into their climate strategies, demonstrating feasibility and value creation.

To ensure NbCR deliver genuine, lasting climate and nature benefits, CLG Europe members have defined a set of Business Principles for High-Integrity Nature-Based GHG Removals. These principles provide a framework for robust, science-aligned, socially just and financially viable deployment – essential for building trust with policymakers, investors and the public. They should inform all future policies that will have an impact on NbCR.

Introduction

The resilience of the European economy rests on the stability of both nature and climate. Nearly three-quarters of businesses in the euro area depend critically on ecosystem services provided by its natural resources – such as clean water, healthy soil and pollination – to maintain their operations.¹ This dependency extends directly into the financial sector, where 75 per cent of all bank loans are granted to companies with direct dependencies on these resources.²

While nature provides the resources, climate change increasingly threatens the ability to utilise them. The financial impact of climate-related extremes is accelerating. Between 1980 and 2024, the EU suffered €822 billion in economic losses, with a staggering €208 billion (roughly 25 per cent of the total) occurring in just the four-year window between 2021 and 2024.³ Today, 64 per cent of EU firms face direct, material financial risk to their bottom line due to climate change.⁴ Without a robust approach to preserving these systems, the very infrastructure of our food, energy and financial security remains at risk.

However, Europe is failing to meet its climate and nature targets. This is clear following the publication of the European Environment Agency's five-yearly 'state of play' report in September 2025,⁵ which sets out not only the overwhelmingly degrading state of European ecosystems but also the risks these pose to the stability and wellbeing of European societies. With more than 80 per cent of protected habitats in a poor or bad state, 60–70 per cent of soils degraded and 34 per cent of Europe's population affected by water stress, many

indicators make for bleak reading. Without a substantial, deep-rooted and economy-wide shift towards a more sustainable use of natural resources,

“the deterioration in the state of Europe's biodiversity and ecosystems is expected to continue, with future policy objectives unlikely to be met.”

This business briefing from CLG Europe will explore what high-integrity nature-based carbon removals are and how they can play an important role in achieving Europe's climate targets. It sets out how leading European businesses are already embedding these activities in their emissions reduction strategies and, given the likely expansion in such activities in the coming years, sets out the conditions for these removals to deliver effectively and holistically on sustainability, as laid out in the Business Principles for High-Integrity Nature-Based GHG Removals.⁶

Degraded ecosystems are a risky business

Increasingly, European companies are recognising the threat that degraded ecosystems represent to established business models and financial stability. In an assessment of eight major Dutch banks, four identified nature-related topics as having material financial risks to their business,⁷ while many major financial institutions are already taking action to understand and mitigate their nature risks.⁸ Companies of all sizes are affected: up to 28 per cent of small and medium-sized enterprise (SME) debt is exposed to high surface water dependencies, while over 10 per cent of long-term debt is exposed to flood risk.⁹ As more organisations assess their material links with nature, evidence is emerging of a strong business and economic case for nature protection and restoration in Europe.¹⁰

The connected climate and nature challenge

Land-use change (eg for intensive agriculture and urban development) and direct exploitation of wildlife have been the primary drivers of biodiversity loss to date,¹¹ but climate change is projected to become just as important as these by 2070.¹² Biodiversity loss from climate change will be substantial, especially at higher levels of warming. Plant and mammal species could be reduced by 19 per cent even with a 2°C rise in global mean temperature.¹³

But just as climate change will deliver increasingly negative impacts for biodiversity, a reduced abundance in ecosystem diversity will also impact our ability to effectively address climate change.¹⁴ Natural systems, both terrestrial and oceanic, in the past decade have removed over half of annual carbon emissions.¹⁵ However, human-induced land-use changes – both those that directly deplete biodiversity (eg deforestation) and those that degrade ecosystems (such as wetland degradation) – currently exceed the capacity of these ecosystems to capture carbon. As a result, land-use change is an overall net emitter of carbon.¹⁶ There is, however, an opportunity to reverse this trend through better management of land and ecosystems, and using well-thought-through nature-based solutions (NbS) to capture more emissions in the future.

Given the deep interconnections between climate and nature, it is clear that any proposed solution to one must consider its impacts on the other in order to be effective. Healthy ecosystems are a powerful tool in our efforts to mitigate the worst impacts of climate change.¹⁷ The role of ecosystems in helping adapt to a changing climate is undoubtedly important, as is the potential for NbS to play a greater role in addressing the root causes of climate change. It is here that this paper will focus, with a continued acknowledgement of the co-benefits of NbS for improved societal resilience, biodiversity and social development outcomes.

Nature-based solutions to climate change

The term ‘nature-based solutions’ (NbS) refers to a range of measures that employ natural systems with the aim of addressing major societal challenges such as climate change and biodiversity loss, while supporting sustainable development.¹⁸

Well-designed NbS can deliver multiple benefits for people and nature, but they go far beyond just planting trees (one of the most common examples) and can even come at the cost of carbon-rich and biodiverse native ecosystems (among other issues) if implemented poorly. Experts have suggested that four guiding principles can enable the sustainable provision of benefits to society by NbS:¹⁹



1

NbS are not a substitute for the rapid phase-out of fossil fuels.



2

NbS involve a wide range of ecosystems on land and in the sea, not just forests.



3

NbS are implemented with the full engagement and consent of Indigenous Peoples and local communities (IPLCs) in a way that respects their cultural and ecological rights.



4

NbS should be explicitly designed to provide measurable benefits for biodiversity.

The European policy landscape – risks and opportunities

The clean transition offers huge benefits for Europe,²⁰ but the question of how European innovators and industries can stay on course in the face of growing global competition – especially from Asia and the US – becomes more acute every day. In this context, a range of areas need to be explored: for instance, the EU's recently released bioeconomy strategy recognises the potential of bio-based sectors (such as agriculture, forestry and fisheries) in driving future competitiveness. Worth €2.7 trillion in 2023 and encompassing 8 per cent of EU jobs and 5 per cent of EU gross domestic product (GDP), the strategic importance of ensuring the future sustainability of these sectors is increasingly visible.²¹

The European Commission recognised this opportunity to “transform Europe’s economy, energy, transport and industries for a more sustainable future” in the 2019 European Green Deal,²² with measures setting the stage for innovation across the continent to scale and deliver green jobs, cleaner and cheaper energy and the economic growth that will lift living standards for millions of Europeans.²³

Leading businesses, including CLG Europe members, show consistent support for this agenda, with over 140 major businesses and investors from 18 countries recently calling on EU policymakers to secure the future competitiveness and technological leadership of the continent through a clear and effective roadmap for the Clean Industrial Deal, to give one example.²⁴

However, despite these opportunities, the policy debate surrounding nature – and, indeed, wider sustainability challenges – has become increasingly polarised and contested in recent years, as policymakers attempt to balance competing and irreconcilable interpretations of these risks.²⁵

Political pressures have led to some initially ambitious policies aimed at securing the future resilience of natural resources being watered down or scrapped altogether. The Nature Restoration Law, narrowly approved by the European Parliament and Council in 2024, is the first comprehensive legislation dedicated to reversing biodiversity loss, and as such is an important milestone. Given the European Commission statement that the benefits of restoration significantly outweigh the costs (for every euro invested, the return can be at least four euros, and in some cases up to eight euros²⁶) the economic rationale for investing in nature restoration is clear. Likewise, the long-term benefits of nature restoration in ensuring food security, climate resilience and resource sufficiency have helped counter perceived short-term threats to specific industries. The law was narrowly passed, helped by business support, solid economic and scientific backing, and sustained pressure from the concerned public and environmental groups. There is still significant political backlash, but this regulation bears the hope of European carbon sinks absorbing more emissions once it is implemented.

A critical recent development is the agreement of the EU's 2040 emissions reduction target²⁷ of 90 per cent emissions reduction (from 1990 levels). This includes increased flexibility in how member states can achieve this target, with up to 5 per cent of the reduction able to come from international carbon credits that effectively outsource emissions reductions to non-EU nations, a change which highlights the increased importance of ensuring the integrity of carbon removals. The role of domestic permanent carbon removals is recognised in the legislation, as is the need for “long-term protection and enhancement of natural carbon sinks and biodiversity”. This agreement sets the context for a likely increase in future use of nature-based carbon removals within Europe, which experts have been requesting for some time.²⁸

The role of nature-based carbon removals

Reducing emissions is the most fundamental step required to avert dangerous climate change, and mitigation efforts rightly remain a priority in many jurisdictions around the world.

However, it has become increasingly clear in recent years that despite some significant success in reducing emissions, global warming projections based on current policies stand at just below 3°C, far higher than the 1.5°C goal set out in the Paris Agreement.²⁹

As a result, increasing attention is being paid to the role of CO₂ removal measures, which are a key element of the 'net' in net-zero (allowing some residual emissions in hard-to-abate sectors to be somewhat balanced by the scaling up of removal strategies).

There are broadly two main groupings of carbon dioxide removal (CDR) technologies and practices:³⁰

Nature-based carbon removals (NbCR), which store CO₂ in soils or biomass.

Engineered solutions, which use novel technologies to convert CO₂ into stable minerals, or capture and store it underground (note that this does not include carbon capture and storage – CCS – which seeks to prevent carbon entering the atmosphere in the first place).

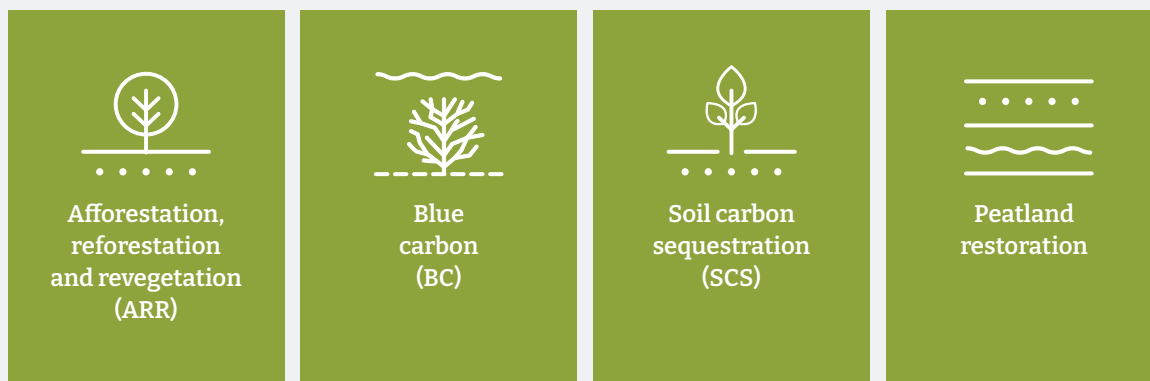
Both approaches have pros and cons, and have attracted much debate. Given the focus of this report on NbCR, this section will focus on solutions under that heading; the potential utility of engineered solutions in future climate scenarios is acknowledged but sits outside the scope of this work.

Climate scientists generally agree that

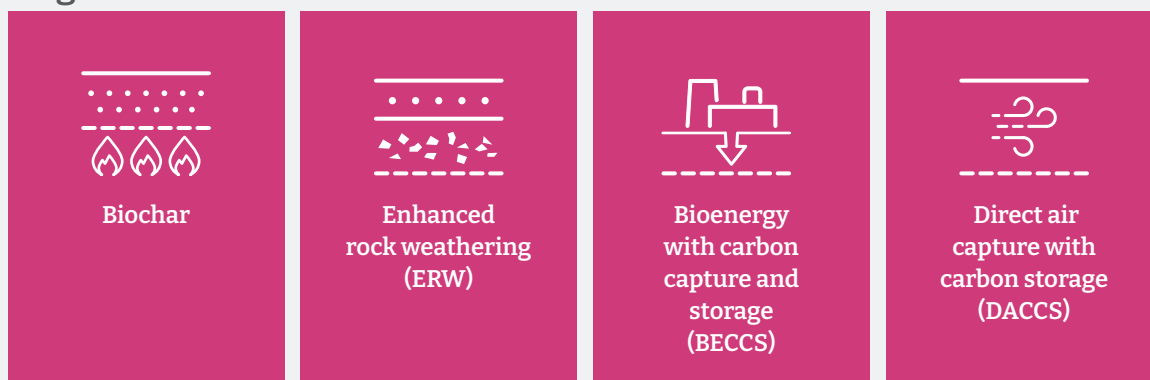
“Reaching net-zero GHG emissions and net-negative GHG emissions therefore involves at least two, and in most cases three, interlinked strategies: deep reductions in CO₂ emissions, the upscaling of CO₂ removal, and deep reductions in other GHG emissions.”³¹

Examples of CDR techniques³²

Nature-based



Engineered



It is important to emphasise that NbCR – or any form of CDR – are not standalone solutions to the climate crisis, and only have a role to play in tackling residual emissions once all measures to reduce emissions as far as is feasibly possible have been exhausted. Nature-based removals may also reduce some of the risks to ecosystem health associated with engineered CDR.³³

The mitigation hierarchy should be followed in line with good practice, with NbCR coming into play only once rapid, deep cuts to direct

and indirect value-chain emissions have taken place.³⁴ There are also challenges around, for example, land use and future disturbances (such as flooding or forest fires) making it harder to predict how long carbon drawn down by NbCR will remain stored (known as ‘permanence’), although when accompanied by ambitious emissions reductions, nature-based carbon storage still provides a climate benefit.³⁵

Given we know that CDR will be required to meet our climate goals (alongside deep emissions cuts), NbCR and their specific advantages have a role to play:

- **Natural solutions are proven to be effective at scale.**

Nature-based solutions (primarily afforestation/reforestation) make up around 99.9 per cent of the world's current removals capacity,³⁶ and remove about twice the amount of carbon annually as Japan currently emits.³⁷ According to the United Nations, in an ideal scenario, by 2050, removals could scale by at least five times this amount to remove at least 10 gigatons of carbon dioxide equivalent a year, more than current estimates suggest will be required to meet the Paris Agreement goals.³⁸

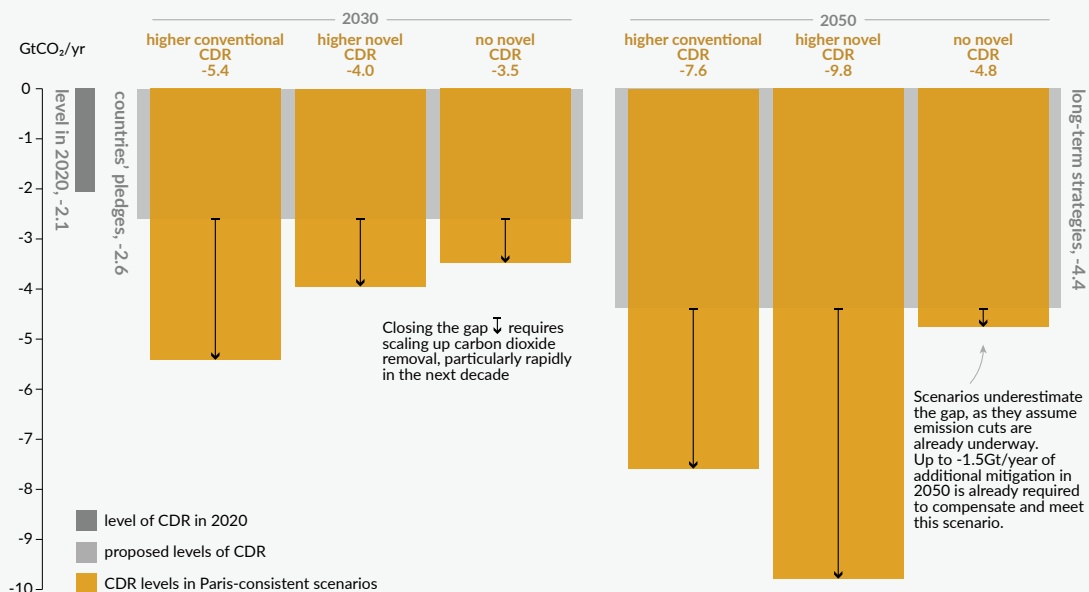
- **They can be initiated quickly and (relatively) cheaply.**

There is not just a need for rapid deployment of CDR *per se*, but a need to front-load this deployment as quickly as possible. Because many solutions require time to properly deliver emissions, starting the implementation as early as possible is necessary. As with many climate solutions, the quicker implementation can occur, the more effective it will be. Figure 1 shows that closing the gap between current CDR pledges and what is needed to reach the goals of the Paris Agreement requires significant scaling up of CDR, and that this needs to be particularly rapid within the next decade. Nature-based carbon removals can be started within months if so desired, and can be achieved for as little as \$10–15 per tonne sequestered.³⁹

Figure 1 – note that in this figure, 'conventional' CDR = nature-based and 'novel' CDR = engineered solutions. Reproduced from Smith et al. (2024) The State of Carbon Dioxide Removal.

There is a ↓ gap between proposed levels of carbon dioxide removal and what is needed to meet the Paris temperature goal

Carbon dioxide removal (GtCO₂/yr), proposed levels compared to **three Paris-consistent 1.5°C scenarios** in 2030 and 2050



Comparatively the cheapest engineered solutions at the moment start at \$60–70, rising to \$1,000, and have more barriers to starting at scale now. Finally, there are few technical or legal barriers to implementing NbCR, as these activities are often already widespread. However, it is worth reiterating that best practice guidelines should still be followed to avoid adverse impacts on biodiversity, local communities and other stakeholders.⁴⁰

- **The co-benefits derived from NbCR can be highly significant for biodiversity conservation, climate mitigation and adaptation, and human development.**

Different NbCR deliver different benefits: forest restoration, for example, can reduce landslide risk (with one study estimating a monetary value of €18,556 per hectare),⁴¹ while urban greening can provide flood regulation, mitigate heatwaves and contribute to local climate regulation. **NbCR can also play a critical role in climate adaptation and emissions reduction.** Degraded peatlands account for up to 5 per cent of global greenhouse gas emissions, making peatland rewetting and restoration a high-impact mitigation opportunity;⁴² an estimated 500,000 km² of peatland will need to be rewetted by 2050 to meet Paris Agreement targets.⁴³ Beyond emissions reductions, restored peatlands increase resilience to climate-related hazards such as floods and wildfires, delivering health and economic benefits through reduced fire incidence and property loss.⁴⁴ Similarly, mangroves provide substantial flood protection benefits – exceeding \$65 billion annually per year 45 – while storing more carbon per unit area than most other ecosystems.⁴⁶

- **Nature-based methods are generally politically palatable.**

It remains the case that certain NbCR techniques may give rise to conflicts, particularly around land use and therefore there is a requirement for robust policy frameworks for implementation that draw on community and stakeholder engagement. However, the majority of the public have an overall positive view of NbCR,⁴⁷ significantly more so than for other forms of CDR. This opens the door to a win-win for policymakers, who can be seen to be taking action to remove hard-to-abate emissions through methods that are widely supported by voters. There are several caveats to this; in order for trust to be built and maintained that effective action is being taken, the involvement of experts and a range of stakeholders in the design and implementation of NbCR policies and projects must be evidenced, and decision-makers have to engage in a candid discussion with citizens to ensure mutual understanding and shared ownership of projects. Adhering to the principles set out below is one way to ensure this is achieved.

Given these considerations, particularly the speed with which NbCR can be implemented and the co-benefits they can deliver, the rapid, urgent deployment of these measures should form a priority for European policymakers. In order to ensure the effective, lasting and just implementation of NbCR projects and identify where they are a suitable course of action in the first place, it will be critical for businesses to follow best practice principles - as outlined in the next section.

Business principles for robust, science-based NbCR

CLG Europe members have agreed on a clear set of principles that promote integrity, alignment with science, social inclusion and long-term financial viability. By following these principles, and encouraging industry peers to do likewise, businesses contribute to building trust with policymakers while demonstrating the viability of NbCR as a legitimate element of European climate and nature strategy.

Business Principles for High-Integrity Nature-Based GHG Removals

1 Additionality to mitigation first

2 Biodiversity-positive outcomes

3 Alignment with science

4 Lasting and resilient

5 Monitoring and disclosure of effective GHG impact

6 Ensure inclusion of local communities

7 Accountability and clear liability chain

8 Ensure alignment with existing legislation

9 Disclose long-term value and risk mitigation potential

10 Investments should be financially viable

The principles in action: examples from European businesses

VELUX and WWF

A strategy for past, present and future

In September 2020, the VELUX Group launched a landmark 20-year partnership with the World Wide Fund for Nature (WWF) to finance high-impact forest conservation and restoration projects.⁴⁸ The primary ambition of this collaboration is to reduce and remove 4.5 million tonnes of CO₂ by 2041.

This volume represents the equivalent of all Scope 1 and 2 emissions generated by the VELUX Group since its founding in 1941.⁴⁹ This commitment allows the company to take responsibility for its past impact while simultaneously demonstrating leadership in corporate sustainability through long-term nature-based solutions.

Crucially, this initiative is designed to go beyond value chain mitigation and operates independently of the Group's decarbonisation strategies. VELUX continues to pursue forward-looking **science-based targets (SBTi) to reduce current Scope 1, 2 and 3 emissions across its operations.**⁵⁰ The carbon units generated through the WWF partnership will not be used for offsetting or trading; instead, the **verified carbon units are retired with an aim to support the host countries' national climate targets.** This approach underscores the

VELUX model company objective, positioning sustainability as a prerequisite for future business relevance rather than a mechanism for regulatory compliance alone.

By decoupling these forest projects from its own science-based reduction targets, VELUX ensures that the climate impact is **additional** to, rather than a replacement for, value-chain decarbonisation. The strategy rigorously applies principles regarding **biodiversity** and **community inclusion**; projects aim to deliver triple benefits for climate, nature and people – ensuring that carbon sequestration simultaneously protects and restores high-value habitats and bolsters local economies through alternative livelihoods. Through a 20-year commitment and robust risk analysis, the initiative prioritises durability and resilience to ensure these nature-positive outcomes are secured for the long term.⁵¹

The partnership's portfolio focuses on tropical forest landscapes that offer this triple benefit for climate, nature and people. By employing a combination of REDD+ (reducing emissions from deforestation and degradation) and ARR (afforestation, reforestation and revegetation) activities, the projects aim to halt biodiversity loss and improve local livelihoods.

To ensure high integrity and enduring impacts, all projects are developed in close collaboration with local communities and are subject to **third-party verification** under the Verified Carbon Standard (VCS) and the Climate, Community and Biodiversity (CCB) Standard managed by Verra.

The partnership's portfolio of forest projects includes:

- **The Green Shores Project (Madagascar):**⁵²

Focuses on protecting and restoring mangrove systems and related hydrology. This project aims to bolster biodiversity while increasing the climate resilience of local coastal communities.

- **Forest Regeneration for Enhanced Carbon (FRECAR – Uganda):**⁵³

Located in one of the world's most biodiversity-rich landscapes, this project targets the regeneration of natural forests in an area severely threatened by deforestation. It emphasises protecting and restoring tropical forests to create habitats for wildlife while supporting local livelihoods through sustainable practices.

- **The Silent Forests Project (Viet Nam):**⁵⁴

Situated in the mountainous Central Annamites Landscapes, this project utilises ARR activities to restore key biodiversity habitat to assist in countering pressures from illegal logging and agricultural encroachment. It works closely with ethnic minority groups to protect a region known for its incredible biodiversity.

The monitoring and verification of the forest projects has proved challenging for various reasons. Firstly, the Verra framework has undergone methodological updates delaying project certification timelines.⁵⁵ Further, evolving legislative landscapes in host countries have also created uncertainty. These factors have required adaptive management, additional resources, and close collaboration with governments and Verra.

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Salesforce

Ambitions and coalitions: Salesforce's balancing of climate and nature through investment and partnerships

Salesforce has evolved its sustainability approach over the past decade to include a comprehensive Nature Positive Strategy, first released in April 2023.⁵⁶ This strategy explicitly calls out the benefits of healthy nature in addition to emissions reductions, expanding from a carbon focus to one that integrates consideration of nature positive and the restoration of biodiversity and ecosystems.⁵⁷

Salesforce also views the strategy as a core business principle beyond cost and risks that can be leveraged for competitive advantage as the strategy can allow the organisation "to develop new products, services, and technologies, as well as to work with our employees, customers, communities, and partners."⁵⁸

To implement this vision, Salesforce targets carbon credits and investments where carbon sequestration offers **compounding benefits for biodiversity and coastal resilience**.

- **Blue carbon focus:**

Salesforce has set a specific goal to contract for 1 million tons of blue carbon credits (eg mangroves, seagrasses) by 2030, an important climate solution that supports biodiversity, safeguards coastal communities and drives carbon removal.⁵⁹



- **Tech-enabled assessment:**

Salesforce purchases carbon credits that are registered with a recognised, ICROA-accredited standard and with an average 'high' integrity, low risk rating from at least one third-party ratings agency (such as Sylvera, BeZero or Calyx).⁶⁰ These specialised partners use multiple approaches and technologies to assess carbon crediting projects and ensure the accuracy of carbon quantification and durability.

- **Restoration at scale:**

The company also supports restoration efforts beyond its support for carbon markets. Through its leadership in the **Forest Future Alliance**, it has committed to help fund the conservation, restoration and growth of 100 million trees, explicitly avoiding monocultures in favour of complex, native forests. In addition to this commitment, Salesforce engages in forest-related work through its \$100 million Nature & Sustainability philanthropy and active work in nature-based carbon compensation.⁶¹

The carbon market has potential to drive capital to where it is needed most. However, this cannot work without the close co-ordination and matching of buyers, developers, investors and funders. To facilitate this, Salesforce has made strategic investments with systems-level players that are working to connect much-needed capital with grassroots work that is poised to scale. This includes partnering with initiatives such as the Mangrove Breakthrough,⁶² as well as investing in the Ocean Risk and Resilience Action Alliance.⁶³

Another example of Salesforce using its convening power to support the market is the Symbiosis Coalition. Co-founded by Salesforce in 2024 alongside Google, Meta and Microsoft, the coalition aims to help overcome key barriers to scaling nature-based solutions by aggregating demand to contract for more than **20 million tons** of high-integrity nature-based carbon removal credits by 2030.⁶⁴

Through this advance market commitment, the Coalition sends a strong demand signal and facilitates long-term offtake agreements that developers need to secure financing and develop large-scale projects, sharing lessons learned and guidance to empower more developers, buyers and investors to act.⁶⁵

This approach demonstrates alignment with the principle of **financial viability of investments**. By helping to build the market through initiatives such as the Symbiosis Coalition, Salesforce helps to de-risk nature investments, advancing these opportunities from purely philanthropic endeavours into a bankable asset class and unlocking the financing needed for greater scale and impact.

Furthermore, these investments are treated as a part of its journey to a net-zero future – deployed alongside efforts to reduce its own emissions in alignment with science-based targets.

EDF

EDF's ecosystem resilience for energy security of the future

For EDF, investing in nature-based carbon removals (NbCR) is driven by the nexus of climate mitigation, adaptation and ecosystem resilience.⁶⁶ While the Group is committed to a net-zero trajectory (aiming for a minimum 90 per cent absolute emission reduction by 2050), it recognises that the remaining residual emissions must be neutralised through high-integrity removals.

Rather than viewing carbon in isolation, EDF integrates these projects into its **broader sustainability pillars**: building the electric system of tomorrow, operating within planetary boundaries and acting for a just transition.⁶⁷ This ensures that NbCR projects not only deliver high quality carbon removals but can also contribute to preserving the **water cycles and biodiversity** upon which energy infrastructure and local communities depend.

The implementation of these strategies is characterised by deep local integration within France,⁶⁸ targeting river basins where EDF operates nuclear and hydropower facilities. By partnering with technical experts such as the Office National des Forêts (ONF) and the Conservatoires d'Espaces Naturels (CEN), EDF ensures that projects like **the Chambord Forest Conservation**⁶⁹ and **the Saint-Nicolas-de-Bourgueil reforestation**⁷⁰ provide verifiable benefits.

EDF wants its initiatives to go beyond carbon sequestration to **focus on habitability**: improving the **resilience of local areas against climatic shocks** and ensuring that the natural regulation of the water cycle remains functional for both human uses and local ecosystems.

Measurement and verification are important under EDF's approach. For carbon sequestration, it relies upon **third-party verification** as part of public standards such as the French Label Bas Carbone (France's official carbon credit scheme) to ensure high levels of integrity, including with regards to biodiversity and water management practices. While EDF acknowledges the challenge of quantifying complex ecosystem services, it views biodiversity outcomes as a primary driver of success rather than a secondary co-benefit, often prioritising ecological health over the simple maximisation of carbon volume. This holistic view helps mitigate the typical trade-offs found in carbon-centric projects, ensuring that reforestation or wetland restoration supports a balanced, multi-functional landscape.

By prioritising a 90 per cent emissions reduction before addressing removals, EDF ensures **nature-based solutions complement rather than replace deep decarbonisation**. The strategy further embeds principles of **biodiversity-positive outcomes** and **alignment with science** by using expert-led restoration to improve local water cycle regulation. Furthermore, by engaging local communities and working to ensure projects are lasting and resilient, EDF fulfils the principle of financial viability through long-term investments that protect both the climate and the natural capital essential for a just energy transition.

Conclusion

Given the increasingly serious impacts of climate change, including devastating floods and droughts within the borders of Europe, there is a clear need to take additional, immediate action to steer the continent back towards a trajectory where climate and nature targets might feasibly be met.

Current policies are failing to address the scale of the challenge, as evidenced by the EU's own Environment Agency. Alongside the urgent, deep cuts to emissions that must be the primary goal of climate mitigation efforts, work to remove carbon from the atmosphere must also be ramped up if the EU's climate goals are to be achieved.

Of the two main ways to carry out carbon dioxide removal (see CDR diagram on page 10) there are proven benefits to nature-based removals, and they are an important strategy that should not be neglected. We know that NbCR can be deployed quickly, relatively cheaply and they are proven to work at scale. They can deliver co-benefits including for biodiversity and climate adaptation, and they are already being deployed by some of Europe's leading companies as part of an integrated strategy to reduce business impacts.

Members of the Corporate Leaders Group Europe, as shown in the case studies, are walking the talk, and their practices and projects show that they are not only desirable, they are also possible, and valuable at multiple levels.

With the EU's 2040 emissions reduction target now set, it is imperative that stakeholders across member states and beyond develop robust, science-based plans to rapidly scale nature-based carbon removals. The principles described above provide a framework through which policymakers, businesses and other decision-makers can ensure these efforts are high-integrity, nature-positive and financially viable. By following them, organisations can ensure accountability and trust is built with their own stakeholders, and that a viable pathway to meeting climate and nature goals is secured in the short term, for the long term.

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