

Climate neutrality as a consensus frame: how EU interest groups framed carbon removals in the 2040 climate target consultation

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Abstract

The European Climate Law requires the European Union to reach climate neutrality by 2050. The objective is quantified, dated and legally codified. However, the role carbon removals will play in it, is still uncertain and was notably discussed during the debates on the 2040 climate target. This research asks whether climate neutrality functioned as a consensus frame in the debate on carbon removals, and which frame packages were mobilised beneath it. Thirty-one submissions from EU interest groups to the public consultation on the 2040 climate target, held between March and June 2023, were analysed through inductive frame package analysis. Twenty-eight documents referred to climate neutrality and none contested the term. However, the content given to it differed across them. Five frame packages were identified: Decarbonisation prioritised, CDR-sector building, Prior service, Fair share and Ecological limits. They did not correspond to actor types, except for Prior service. Eighteen documents asked for emission reductions and carbon removals to be governed by separate targets, and this demand was produced by the two packages whose definitions of the role of removals are opposed: in one, separation prevents removals from substituting for reductions and should be limited as much as possible; in the other, it secures dedicated support for the future deployment and rapid uptake of removals. The results show that legal codification did not remove the indeterminacy of climate neutrality but displaced it into the accounting operation on which the target rests, and therefore onto the role carbon removals will play within it.

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1. Introduction

1.1. Carbon removals relevance and debate in EU policymaking

Limiting global warming to 1.5°C above pre-industrial levels is the challenge of this century. It requires drastically reducing global greenhouse gas (GHG) emissions and reaching net zero approximately around 2050 (IPCC, 2022). Net zero carbon dioxide (CO₂) emissions are defined as follows by the IPCC (2018): “Net zero CO₂ emissions are achieved when anthropogenic CO₂ emissions are balanced globally by anthropogenic CO₂ removals over a specified period. Net zero CO₂ emissions are also referred to as carbon neutrality”. By extension, climate neutrality refers to all GHG.

As part of this net zero goal, carbon dioxide removals (CDR) are necessary to counter-balance hard-to-abate emissions. In fact, no pathway assessed reaches the objective of limiting global warming to 1.5°C without relying to some extent on CDR (IPCC, 2022), which is the capture of CO₂ from the atmosphere and its durable storage in geological, terrestrial, or ocean reservoirs, or in products (IPCC, 2018). Climate neutrality is therefore not a purely reductive objective but a balance between emissions – and how much they could be reduced – and removals.

In 2021, the European Union (EU) translated this objective, which was set out in the European Green Deal, into binding law. Article 2(1) of Regulation (EU) 2021/1119, known as the European Climate Law, requires Europe to become climate-neutral by 2050. This means achieving net zero GHG emissions for EU Member States as a whole. The obligation is quantified, dated, legally codified, and subject to periodic review. Climate neutrality is in this sense a far more determinate goal than the concepts that organised earlier phases of EU environmental policy, such as sustainability during the development of the EU Green Deal.

Nonetheless, climate neutrality refers to net zero emissions which are an aggregate. It fixes the sum without fixing its components (emissions - and consequently reductions - and removals). Whether removals may substitute for emission reductions or only complement them, which removal activities qualify, how long storage must hold, and who may claim the resulting units are questions the target leaves open (McLaren et al., 2019; Carton et al., 2023). While the role of CDR in EU climate policy is now considered essential (Brad & Schneider, 2025), concerns have been raised about the risk of mitigation deterrence (Anderson & Peters, 2016; Grant et al., 2021; Carton et al., 2023). This term describes the possibility that the expectation of large-scale CDR deployment in the future weakens or postpones emission reduction efforts in the present (Brad & Schneider, 2025). Therefore, the openness of the term does not only have technical consequences but also societal and political ones.

These questions became even more present during the negotiation of the EU 2040 climate target, whose objective was to set the path towards climate neutrality in 2050. A public consultation was launched in 2023. Following that, in July 2025, the Commission proposed a binding 2040 target of a 90% net reduction in GHG emissions relative to 1990. This proposal received final approval in March 2026 and amended the Climate Law (Regulation (EU) 2026/667, 2026). After heavy discussions, the role of CDR was still not fully clarified in the final amendment. Today, the debate carries on in current negotiations for operationalising the 2040 target, notably the revisions of the EU Emissions Trading System (EU ETS) and the Effort Sharing Regulation (ESR).

Climate neutrality appears to be accepted by a wide range of stakeholders, yet there seems to be divergence on how to reach it. Different arguments are put forward by different interest groups on how to use carbon removals while invoking the same overarching goal of climate neutrality and sustainability.

Hence, it is still relevant to understand how the carbon removal debate is framed by the different interest groups in EU climate policymaking.

Recent work has begun to document how carbon removals are contested in EU climate policy (Brad & Schneider, 2025). This literature has largely catalogued the positions and justifications that actors state explicitly. However, the frames used in the debates have not been documented so far. Framing consists in selecting certain aspects of a perceived reality and making them more salient in a communicating text, in order to promote a particular problem definition, causal interpretation, moral evaluation or treatment recommendation (Entman, 1993). Instead of focusing on recording what actors state, framing analysis reconstructs the interpretive structures that organise those statements, including the assumptions that are mobilised without being argued for. Frame package analysis was developed by Van Gorp (2007). Candel et al. (2014), Ingram (2021), and van der Graaf (2023), applied Van Gorp's theory to the CAP, the farm to fork and the biofuels debates respectively, but not yet to carbon removals. This thesis transposes that approach to the 2040 target consultation.

1.2. Research questions

This research therefore asks: **how is climate neutrality framed by EU interest groups in the debate on carbon removals, as expressed in the public consultation on the EU 2040 climate target between March and June 2023?**

The hypothesis is that climate neutrality functions as a consensus frame. It is endorsed by nearly all actors, while the positions it covers are mutually incompatible. Carbon removals are where this incompatibility becomes visible as they determine what neutrality is actually made of.

Four sub-questions structure the analysis:

- Does climate neutrality function as a consensus frame in the EU carbon removals debate?
- Which frame packages do EU interest groups mobilise on carbon removals? And by which actor types?
- How does each frame package define the role of removals in achieving climate neutrality?
- To what extent do actors mobilising different frame packages converge or diverge on policy demands?

1.3. Case selection

The 2040 climate target consultation was selected as the case for three reasons.

First, the consultation took place before the Commission published its proposal. Positions were therefore stated when the outcome was still open, and not adjusted to a result already known. These submissions are also written, public, and self-structured. Interest groups decided what to raise, in what order, and at what length. What each of them makes salient is its own choice and not an effect of the instrument used to collect it.

Second, the 2040 target is the moment when the role of removals became an operational question in EU climate policy. The consultation is thus the point at which interest groups had to state what climate neutrality requires in practice and what role removals should play in it.

Finally, the 2040 target is a framework decision from which subsequent legislation derives. It sets the level of ambition and the rules within which the operational instruments are then revised. This is currently what is happening with the revisions of the EU ETS and of the ESR. Hence, what interest groups argued for in 2023 still concerns decisions that are currently being taken.

1.4. Structure

This thesis is organised in six chapters. Chapter 2 reviews the literature on interest groups, framing and consensus frames, and on carbon removals in EU climate policy, and identifies the two research gaps this study addresses. Chapter 3 presents the methodology (inductive frame package analysis), and describes how the corpus was selected from the feedback submitted to the public consultation on the 2040 climate target. Chapter 4 presents the results. It first examines whether climate neutrality functions as a consensus frame, then reconstructs the five frame packages identified in the corpus, and finally compares them. Chapter 5 discusses these results against the framing literature and sets out the limitations of the research. Chapter 6 concludes.

2. Literature

2.1. Interest groups

Interest groups are central to EU policymaking. Beyers et al. (2008) identify three features that define them: they are organised, they pursue political interests, and they act informally rather than through electoral competition. The access interest groups have to the EU institutions depends largely on the expertise and knowledge they supply (Bouwen, 2002), which can be described as informational lobbying (Woll, 2012). Chalmers (2013) even highlighted that “the currency of lobbying in the EU is information”. Consultations are one of the channels through which this information is provided. What interest groups submit is therefore not a neutral description of a problem. It is information selected and organised to support a position.

2.2. Framing

Framing describes this selection. As set out above, Entman (1993) defines framing as making certain aspects of a perceived reality more salient in order to promote a particular problem definition, causal interpretation, moral evaluation or treatment recommendation. Applied to interest groups, framing is the mechanism through which an actor turns its interest into an argument that policymakers can accept. The concept was developed in communication studies and has been applied to EU interest group research more recently (De Bruycker, 2017). Entman's definition describes what framing does but not how a frame can be identified in a text. Van Gorp (2007) addresses this through the frame package, and provides a method to identify frame.

The literature distinguishes two levels at which frames operate. Micro-frames are promoted by individual actors seeking to shape a specific aspect of a debate. Macro-frames define the debate collectively, and result from wider societal processes that no single actor controls (De Bruycker, 2017). The positions on carbon removals examined here operate at the micro level. Measuring whether a given micro-frame influenced a policy outcome is difficult (De Bruycker, 2017) and it is not the goal of this research. Instead, it asks what micro-frames were used by interest groups to frame carbon removals.

2.3. Consensus frame

Some frames attract agreement from actors who would otherwise disagree. This is notably the case with “consensus frames”. Mooney and Hunt (2009) describe them as notions to which nearly all actors give “non-reflexive consent”. Sanchez Antelo (2025) traces the concept to Gamson (1995), who also depicted them as widely recognized issues that are difficult to disagree on but that hide conflicting positions. They are endorsed without argument because opposing them is not a credible position. Agreement is given to the term but not to its content. According to Mooney and Hunt (2009), these types of frames are potent, and this potency generates competition amongst the stakeholders as to define what the frame requires precisely. Therefore, it does not produce a single shared position. In the present research, these distinct positions are reconstructed as frame packages, as defined in Section 2.2.

This is notably the case for food security and sustainability, which have been identified in the literature as consensus frames in several EU policy debates. Indeed, Candel et al. (2014) identify food security as a consensus frame in the reform of the Common Agricultural Policy, where actors with opposing positions on liberalisation all presented their preferred policy as actually contributing to food security. Ingram (2021) reaches a similar conclusion for sustainability in the Farm to Fork strategy. Van der Graaf (2023) finds both frames operating simultaneously in the third revision of the Renewable Energy Directive on the biofuels debate.

Climate neutrality does not appear to have been examined yet in these terms. It also differs from the concepts studied so far in the sense that food security and sustainability are open-ended objectives with no fixed metric and a relatively vague definition. By contrast, climate neutrality in the EU policy context is quantified, dated, and codified in Article 2(1) of the European Climate Law.

The argument developed here is that codification in the law did not fully remove the vagueness as the definition still allows room for interpretation. Indeed, climate neutrality in this case is equivalent to net zero emissions. It is the balance of emissions and removals however it does not specify the amount of emissions and removals. This leaves a wide range of possible pathways, interpretations and consequences as to what this “net zero” entails. The same objective can be reached through deep emissions cuts and few removals or, by contrast, continued emissions and large volumes of removals. Both have very different major societal consequences but meet the same definition. Hence, it is argued that climate neutrality can function as a consensus frame and will be further investigated in this study. This is the first research gap that will be assessed.

2.4. Carbon removals in EU climate policy

In recent years, carbon removals have become more prominent in EU climate policy. For example, in 2024, the EU established the Carbon Removals and Carbon Farming Regulation (CRCF) providing a certification framework for removals. CDR in EU policies has also been studied and investigated in the scientific literature.

What has received attention is notably the risk of mitigation deterrence. For example, Brad and Schneider (2023) assessed this risk in EU climate policy, and identified the separation of emission reduction and removal targets as the principal instrument proposed to contain it. Another topic of investigation is the positions of the actors involved on CDR. For example, hard-to-abate and fossil industries in the EU positions on CDR were examined (Brad et al., 2024). Losi et al. (2026) assessed more broadly which actors participate in CDR consultations at European and United Nations level, and what positions they take. Finally, Brad and Schneider (2025) analysed stakeholder preferences and rationales on target separation in the 2040 negotiation, and found that a majority of consulted stakeholders favoured separate targets.

Positions of actors on CDR and their rationale have been well documented recently in the literature. However, what has not been examined yet – to the author's knowledge – is the interpretive structure that organises these positions: which problem definition each actor works from, what it treats as self-evident rather than argues for, and what its position assumes about the goal that removals are meant to serve. That is what frame package analysis makes visible and therefore was deemed relevant. As mentioned before, this method was already used to other EU policy debates but has not been used yet to analyse the CDR policy sphere. Reconstructing frame packages makes it possible to compare actors who make the same demand for different reasons, and actors who make opposing demands from the same stated commitment.

This is the second research gap that will be addressed in this study.

3. Methodology

3.1. Frame package analysis

This research follows the methodology of inductive frame package analysis, introduced in Section 2.2, developed by van Gorp (2007, 2010). The goal of this approach is to objectify framing analysis. Similarly to previous studies (e.g. Candel et al., 2014; Ingram, 2021; van der Graaf, 2023), it was considered suitable to identify frames in EU policy debates. This section explains how the approach was applied here.

The analysis is inductive in the sense that no list of frames was defined before coding. A frame package combines framing devices and reasoning devices. Framing devices are the observable elements of a text, such as word choices, metaphors, visual images and examples. Reasoning devices are the problem definition, the causal attribution, the moral evaluation and the proposed solution that the text implies. The framing devices are visible in the document. The reasoning devices are reconstructed by the researcher. Following the constructionist approach set out by van Gorp (2010), the frame packages were built from the documents themselves and refined as coding progressed.

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3.2. Corpus and coding

The first step was to define the corpus. It was sourced directly from the European Commission's Have Your Say portal. Initiative 13793 corresponds to the policy cycle related to the 2040 climate target. It collected 579 feedback submissions between 31 March and 23 June 2023. The answers addressing carbon removals were then selected by filtering the documents with the keywords “removal” and/or “CDR”, which reduced the corpus to 39 documents. Feedbacks submitted by individuals were excluded, since the study focuses on interest groups. This resulted in a preliminary corpus of 33 documents. Two of them¹ were translated into English using online translation software. The remaining thirty were submitted in English. After careful analysis, two additional documents² were removed from the corpus as the main focus of their position was not related to climate neutrality. A similar approach was applied by van der Graaf (2023). The full list of 31 interest groups included in the corpus can be found in Table A (see Appendix 1).

Each document was then coded individually. A first round of coding identified the different devices used in each feedback. A frame matrix similar to the one used by van der Graaf (2023), itself based on van Gorp and van der Goot (2012), was used to record this analysis and is shown in Table 1. Not every device was identified in every feedback.

Table 1. Empty frame package matrix

	Reasoning devices					Framing devices		
	Definition of climate neutrality	Problem definition	Solution	Non-solution	Moral basis	Key concepts	Verbal devices	Visual devices
Feedback received								

A second round of coding identified axes of meaning, grouping segments that shared similar patterns and overarching ideas. These were then consolidated into the final frame packages, which are presented in the next chapter.

¹ Fransylva, Association Workshop for All Beings

² University of Bergen, Haffner Energy

4. Results

4.1. Climate neutrality as a consensus frame

The first sub-question asked whether climate neutrality functions as a consensus frame in the EU carbon removals debate. After conducting the frame package analysis as described in Chapter 3, the corpus confirms this.

Indeed, following Mooney and Hunt (2009) and as set out in Section 2.3, three characteristics identify a consensus frame:

- Actors give it near-universal endorsement,
- There is considerable dissensus behind that endorsement,
- And the frame is potent enough that actors compete to own it.

The first characteristic is present in the corpus. Indeed, 28 out of the 31 documents refer explicitly to climate neutrality or net zero. The three remaining³ documents do not use these terms but do not make any argument against the objective. No document in the corpus contests climate neutrality as the goal of EU climate policy, and none proposes an alternative.

The second characteristic concerns the dissensus behind the endorsement. Two dimensions of divergence were identified in the definitional statements:

- The first dimension of divergence is around what can be part (or not) of the balance. Puro.earth defines the only foreseeable pathway to net zero as one in which residual emissions from aviation, shipping and heavy industry are balanced with durable removals, and names biochar, enhanced rock weathering and direct air capture. EREF prioritises nature-based sequestration over industrial removals. The Confederation of European Forest Owners defines the achievement of neutrality as the combination of a fossil-free bioeconomy with active forest management. Each of these describes the same objective (reaching net zero) but has a different view on what it should look like.
- The second is what other concepts the term contains. For BirdLife, climate action is defined as integrating biodiversity restoration and a transparent, participatory and rights-based approach. For the Clean Air Task Force, climate ambition must be nested within broader economic and social considerations including industrial competitiveness. For EEX, a truly net-zero future means using the full potential of the EU ETS and a market-based uptake of low-carbon technologies. Each of these has divergent views as to what climate neutrality requires, importing a different set of commitments.

In both cases, the divergence itself is never stated as a disagreement. Indeed, actors define climate neutrality in incompatible ways without registering that other actors define it differently.

The third characteristic is the potency of the frame and the fact that actors compete for it. This is observable in the corpus. Actors do not simply endorse climate neutrality but present their own position as to what climate neutrality requires. For example, on one hand, EREF argues that emphasising CDR technologies risks greenwashing and directs investment away from more effective and readily available

³ IFOAM, PFPI, and CircE

solutions. On the other hand, Puro.earth claims that the only foreseeable pathway to climate neutrality is with durable CDR.

Finally, as explained in section 2.3, a consensus frame also generates several distinct sub-frames, which is also the case here. The frame packages identified are presented in Section 4.2 and are distinct positions the climate neutrality consensus frame has generated on the carbon removals debate.

In conclusion, climate neutrality does act as a consensus frame in the carbon removals debate for the 2040 climate target.

4.2. Frame packages in the CDR debate

The second and third sub-questions asked which frame packages EU interest groups mobilise on carbon removals, and how each package defines the role of removals in achieving climate neutrality. As set out in Section 2.3, a consensus frame consists of multiple distinct positions. This section reconstructs those positions as frame packages as described in Chapter 3.

Five frame packages were identified: Decarbonisation prioritised, CDR-sector building, Prior service, Fair share and Ecological limits. Each of them is presented below with its framing matrix, following the format set out in Section 3.1. Table B gives an overview of the frames used by the different stakeholders (see Appendix 2).

Two points should be noted before turning to them. First, the packages are not mutually exclusive. A document may mobilise more than one, and 10 of the 31 do. Second, the packages do not correspond to actor types (with one exception discussed below). Environmental NGOs, academic consortia, business associations and CDR developers are found in the same packages, and actors of the same type are found in different ones.

4.2.1. Decarbonisation prioritised

Decarbonisation prioritised is the most widely mobilised package in the corpus. The analysis identified 16 documents using it (listed below Table 2). It defines climate neutrality as an objective reached by cutting emissions, in which removals compensate only what cannot be eliminated. It defines the problem as follows: expecting removals weakens the reduction effort in the present, and it highlights the uncertainty around removals in contrast with the certainty of emission reductions. It leads to the recommended solutions: separate and non-fungible targets, quantified limits on the removal share, and a binding carbon budget. The complete frame package is presented in the table below.

Table 2. Frame package of Decarbonisation prioritised

Definition of climate neutrality	An objective reached through absolute gross emission reductions, in which removals compensate residual emissions only
Problem definition	Anticipated uncertain removals displace certain emissions reductions. Removals are reversible, limited in potential and not yet demonstrated at scale
Solution	Separate and non-fungible targets for reductions, land sinks and permanent removals. Quantified limits on the removal share. Binding carbon budget

Non-solution	Counting removals against reduction obligations in the ETS or the ESR. Combining agriculture and forestry in a single AFOLU target, which would allow agricultural emissions to be compensated by forestry removals
Moral basis	The atmosphere responds to gross emissions and not to net accounting
Key concepts	Mitigation deterrence, additionality, gross versus net, carbon budget
Verbal devices	Real emission reductions
Visual devices	Removals as an “extended lifeline for fossil fuels” ⁴

The package is carried by CDRmare, IFOAM, T&E, EREF, BirdLife, the Association Workshop for All Beings, FANC, ECOS, CircE, PFPI, Green Transition Denmark, CDRterra, We Mean Business, CLG Europe, PRI and EDF. It covers a wide range of actor types. It includes ten NGOs, of which eight are environmental organisations, one an organic agriculture federation and one a financial investor group, as well as two academic consortia, two business associations, one business coalition and one electricity producer. This distribution indicates that the use of the Decarbonisation prioritised frame does not follow actor types. This frame is not necessarily used to make the same demands, but the problem definition and the moral basis are shared. This is notably the case for EDF and IFOAM. While EDF focuses mainly on the ETS and IFOAM on the Agriculture, Forestry and Other Land Use (AFOLU) sector, the logic used is the same.

4.2.2. CDR-sector building

CDR-sector building is the second most widely mobilised package in the corpus. Nine documents mobilise it and are listed in the paragraph below Table 3. This frame package defines climate neutrality as a two-sided objective that cannot be reached by cutting emissions alone. In this package, the problem is that the removal capacity required by the objective does not yet exist at the scale needed, and will not develop without policy demand. The solutions follow from this: volume targets for removals written into legislation, targets differentiated by permanence, and public instruments to support deployment. The complete frame package is presented in the table below.

Table 3. Frame package of CDR-sector building

Definition of climate neutrality	A two-sided objective in which durable removals counterbalance residual emissions, and which enables net-negative emissions after 2050
Problem definition	The durable removal market is nascent. Purchased volumes are not delivered, lead times run to decades, and existing policy frameworks were designed for a zero target rather than a net-zero one
Solution	Volume targets for removals in legislation. Targets differentiated by permanence and readiness. Geological storage capacity targets. Certification standards creating verified and tradable removal units. Public procurement and a compliance market
Non-solution	Defining eligibility by method rather than by measurable quality. Conflating fossil carbon capture with removals
Moral basis	A balance that has not been built cannot be relied upon. European industrial leadership in a new sector
Key concepts	Permanence and durability classes, scaling trajectory, lead times, carbon debt

⁴ EREF

Verbal devices	Hard-to-abate
Visual devices	The “valley of death” ⁵ , “viable” ⁶

The package is carried by Climeworks, Puro.earth, RCMP Solutions, Carbon Atlantis, the Negative Emissions Platform, Ørsted, the Clean Air Task Force, EEX and Bioenergy Europe. These nine documents are predominantly business actors. They include three carbon removal developers, one carbon registry, one market operator, one energy developer and two business associations, alongside one environmental NGO.

The moral basis distinguishes this package from Decarbonisation prioritised. Both accept that removals will be needed. However, Decarbonisation prioritised treats that need as a residual to be minimised while CDR-sector building treats it as a priority, as a capacity to be built, and derives its demands from the conditions under which capacity develops. Ørsted states this directly. It asks for separate targets on the ground that separation is conducive to overcoming the initially higher price of industrial removals, and that it will “send the technology down the cost curve”.

The CRCF is welcomed by the carriers of this package. Puro.earth issues CO2 Removal Credits per tonne removed and durably stored, and the Negative Emissions Platform describes the framework as a positive step towards the compliance market the sector would ultimately require.

4.2.3. Prior service

Prior service is mobilised by six documents listed below. Climate neutrality is presented as an objective to which the actor's own sector is already contributing. It defines the problem as follows: the sector's existing contribution to emissions reduction and removal is not recognised. Moreover for the AFOLU sector, it risks carrying obligations that belong to others while the sink cannot be relied upon to deliver more. This leads to the recommended solutions: acknowledging what the sector has already achieved, setting realistic land-sector targets, and establishing certification that rewards the activity. The complete frame package is presented in Table 4.

Table 4. Frame package of Prior service

Definition of climate neutrality	An objective to which the sector already contributes, through substitution of fossil-based materials and energy and through existing sinks
Problem definition	The existing contribution is not acknowledged. Risks of carrying obligations that belong to other sectors. Sinks are vulnerable and cannot deliver more (Land sector).
Solution	Acknowledge what the sector has already achieved. Set realistic and feasible land-sector targets. Certification and remuneration of sequestration and substitution. Active and adaptive management
Non-solution	Combining agriculture and forestry in a single AFOLU pillar. Setting forests aside or restricting management. Making the sector responsible for the emissions of other sectors

⁵ Clean Air Task Force

⁶ Ørsted

Moral basis	Contribution earns recognition. All sectors must do their part, and one sector's sink must not carry another sector's emissions
Key concepts	Active sustainable forest management, substitution effect, sink vulnerability, contribution, recognition
Verbal devices	'the valuable work of forest owners', 'all sectors must do their part', 'already climate neutral today', reward
Visual devices	-

The package is carried by CEWEP, Fransylva, the European State Forest Association, the Confederation of European Forest Owners, the Climate Leadership Coalition and Bioenergy Europe. These six documents all represent sectors that manage a physical sink or a substitution activity. They include three business associations, one federation of private forest owners, one association of state forest managers and one business coalition.

For this package, all stakeholders are the same type: they all represent sectors that manage a physical sink or a substitution activity. CEWEP states that the European waste-to-energy sector is already climate neutral today. EUSTAFOR states that forests and forestry have been delivering significant results in terms of climate mitigation for several decades. CEPF notes that forest area and growing stock have continued to increase since 1990. Bioenergy Europe states that bioenergy is a major contributor to the progress the EU has already made. In each case, the actor's claim highlights past and current achievements, and does not refer to the future.

The treatment of sink vulnerability distinguishes this package from the others. The physical fact is not disputed anywhere in the corpus. AFOLU sinks are exposed to fires, pests and drought, and their evolution is uncertain. In Decarbonisation prioritised, this fact grounds the argument that removals cannot be relied upon in place of reductions. Here, it grounds the argument that the sector should not be assigned a demanding land-sector target. Fransylva states that the ability to achieve climate neutrality must not depend solely on forest sinks. EUSTAFOR asks the Commission to recognise the vulnerability of forests and to accept the uncertainties related to their sinks. The same evidence is used to reach opposite conclusions about what should be required.

4.2.4. Fair share

Fair share is mobilised by five documents. It defines climate neutrality as the EU's share of a global carbon budget rather than as a domestically determined objective. It defines the problem as follows: the target is currently being set on grounds of feasibility and cost instead of responsibility. What the EU owes is not calculated. This leads to the following recommended solutions: defining an EU carbon budget on fair-share principles, delivering reductions domestically, and providing financing support. The complete frame package is presented in the table below.

Table 5. Frame package of Fair share

Definition of climate neutrality	The European Union's share of a global carbon budget, determined by historical responsibility and capacity to act rather than by domestic feasibility
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Problem definition	The target is set based on feasibility and cost. The EU's share of the remaining global budget is not calculated. The burden is displaced onto the Global South and onto vulnerable groups
Solution	Define an indicative EU GHG budget on fair-share principles, including historical responsibility, capacity to act and consumption-driven emissions. Reduce domestic gross emissions. Provide finance and support for action in other countries. Allocate reduction and removal targets equitably between Member States
Non-solution	Meeting the target through units acquired abroad in place of domestic reduction. Setting the target by technical feasibility alone
Moral basis	Historical emissions and the capacity to act generate an obligation
Key concepts	Fair share, historical responsibility, capacity to act, consumption-driven emissions, effort sharing, carbon budget
Verbal devices	'fair share', 'historical responsibility and capacity to act', 'just transition'
Visual devices	-

The package is carried by T&E, BirdLife, the Association Workshop for All Beings, NEGEM and FANC. These five documents are four environmental NGOs and one academic consortium.

Fair Share and Decarbonisation prioritised are mobilised together in four of these five documents. Their demands are close, since both ask for deep domestic reductions and for limits on removals. Nonetheless, the reasoning behind the demand is not the same. On one hand, Decarbonisation prioritised argues from a geophysical point of view (global warming is caused by gross emissions released in the atmosphere hence the focus should be to reduce the emissions released and not net accounting). On the other hand, Fair share brings a social perspective. It argues from what the EU owes, given what it has already emitted and what it is able to do.

NEGEM shows what is at stake in this difference. It allocated a global cumulative CDR requirement of 687 Gt by 2100 using different effort-sharing principles. The resulting cumulative target for the EU28 ranges from 32 Gt under an equity principle to 325 Gt under a capacity principle. The quantity of removals the EU should deliver therefore varies by a factor of ten depending on the principle applied. It also recommends an “equitable and fair allocation of emission reduction and carbon dioxide removal targets between EU Member States”.

T&E states the same point in general terms. It notes that distributing the global emissions budget among parties can follow historical responsibility, per capita emissions or cost-effectiveness, and that “the identification of a state's or region's share is ultimately political”.

4.2.5. Ecological limits

Ecological Limits is mobilised by seven documents listed under Table 6. It defines climate neutrality as an objective that must be reached within ecological limits (instead of only within a carbon budget). The problem is framed as follows: removals compete for ecological resources and some methods damage the ecosystems that climate policy should also be protecting. The recommended solutions are therefore assessing the environmental impact of removal methods before setting targets for them, applying the do

no significant harm principle, and restricting removals to those that deliver co-benefits. The complete frame package is presented in the table below.

Table 6. Frame package of Ecological limits

Definition of climate neutrality	An objective reached within ecological limits, in which climate action supports rather than undermines biodiversity, soil and water
Problem definition	Removal methods compete for land, water and biomass and can degrade the ecosystems they are meant to protect. Their environmental impacts are not assessed before targets are set, and the trade-offs are specific to each ecosystem and management type
Solution	Assess the environmental impacts of removal methods before setting targets. Apply the do no significant harm principle across climate and energy policy. Expand ecological farming and forestry practices. Protect mature forests and restore degraded ones
Non-solution	Large-scale expansion of biomass-based removals. Methods that degrade biodiversity or the good state of waters. Targets set without prior ecological assessment
Moral basis	A climate solution that damages other environmental goals is not a solution. Biodiversity and climate are interconnected
Key concepts	Do no significant harm, life cycle assessment, co-benefits, trade-offs, land and water competition, ecosystem health
Verbal devices	'do no significant harm', 'win-win for climate and biodiversity', 'trade-offs'
Visual devices	-

The package is carried by IFOAM, BirdLife, PFPI, CDRterra, NEGEM, FANC and the Clean Air Task Force. These seven documents are five NGOs, of which four are environmental organisations and one an organic agriculture federation, and two academic consortia.

NEGEM considered the broader environmental impact of CDR in its analysis by conducting a life cycle assessment of thirty-six different CDR configurations. The aim was to establish their realistic potential, and concludes that this potential is substantially restricted once environmental constraints are taken into account. The assessment is presented as a condition for setting any removal target, and not as a subsequent consideration.

CDRterra makes the same argument in a different form. According to them, the do-not-harm principle should prevail, and how to evaluate it needs to be clearly defined. It also observes that the neutrality target will have very different impacts on ecosystems and society depending on whether net zero is reached as the balance of two large gross quantities or of two small ones. The same objective can be met by very different pathways, and the ecological consequences of those pathways are not equivalent.

The Clean Air Task Force is the only carrier of this package that also uses the CDR-sector building frame packages. It assesses the CDR technology Bioenergy carbon capture and storage and its deployment against environmental criteria.

4.3. Comparison of the frame packages

The fourth sub-question asked to what extent actors mobilising different frame packages converge or diverge on policy demands. After analysing each frame package in isolation, this section compares them. First, it appeared there is one main convergent demand stemming from two different frame packages. This demand is highlighted in subsection 4.3.1. Second, some frames made divergent claims which are presented in subsection 4.3.2.

4.3.1. Convergent demand – separate targets for reductions and removals

Eighteen documents⁷ ask for emission reductions and carbon removals to be governed by separate targets rather than by a single net figure. Only EEX argues against it, asking for one clear-cut target covering the entire economy. This convergence is already documented: Brad and Schneider (2025) find that a majority of stakeholders consulted preferred two or three separate targets, and identify target separation as the principal instrument proposed to address mitigation deterrence.

In this analysis, the demand is produced by two frame packages:

- On one hand, Decarbonisation prioritised produces separation as a barrier. Its problem definition holds that anticipated removals displace present reduction effort, so the two quantities must not be able to substitute for one another. T&E asks that emission reduction targets be kept separate from removal targets. ECOS fears that removal activities will take the focus away from emission reductions, and that separation would limit the risk of mitigation deterrence. We Mean Business and CLG Europe ask for three separate targets in order to make the assumed reliance on removals explicit.
- On the other hand, CDR-Sector building produces separation as an enabling condition. According to the frame, the problem is that the removal capacity does not yet exist and will not develop without dedicated policy demand. Hence, it should be a distinct policy object. Ørsted asks for separate targets because separation “will send the technology down the cost curve” and “will send political signals on the necessity to promote and scale carbon removals – a sector in which the EU could become a global leader”. Climeworks asks for it because it brings clarity for the evolving CDR sector and allows dedicated policy instruments for near-term deployment.

The same instrument therefore serves two opposite purposes. In one package separation exists so that removals cannot be relied upon in place of reductions. In the other it exists so that removals receive the policy support that reliance on them would require. This frame package analysis makes it possible to identify that behind the same demand there can be opposing reasoning devices.

4.3.2. Divergent claims

The packages also draw opposite conclusions from shared facts, and give different answers to questions that the corpus does not treat as open.

⁷ CDRmare, IFOAM, T&E, ECOS, CircE, Green Transition Denmark, We Mean Business, CLG Europe, PRI, EDF, Climeworks, Puro.earth, Ørsted, Clean Air Task Force, NEP, RCMP Solutions, Carbon Atlantis, NEGEM.

Vulnerability of land sinks

Forest sinks are exposed to fire, pests, drought and windthrow, and their future evolution is uncertain. This physical fact is not disputed anywhere in the corpus. However, two different frame packages use it to make two divergent claims:

- In Decarbonisation prioritised, this fact grounds the conclusion that removals cannot be relied upon in place of reductions.
- In Prior Service, it grounds the conclusion that the land sector should not be assigned a demanding target.

The same evidence supports the argument that removals should be limited and the argument that obligations on the sector should be limited.

Role of CDR

A second divergence concerns what removals are for:

- Decarbonisation prioritised treats them as a residual to be minimised.
- CDR-sector Building treats them as a capacity that must be built before it can be relied upon.
- Prior Service treats them as a contribution that is already being made and that is not being counted.

How to determine the quantity of CDR needed

A third divergence concerns what determines the quantity of removals the EU should deliver:

- In Decarbonisation prioritised the quantity is set by physical necessity, that is, by what cannot be eliminated. The starting point is to calculate the total emissions reduction potential and then deduct the remaining amount of hard-to-abate emissions that will need to be removed.
- In CDR-sector Building it is set by what the sector can scale to, which is why the demand is framed in volume targets and deployment trajectories. It estimates the maximum potential the CDR sector could deliver and bases the target on that.
- In Fair Share it is set by obligation. NEGEM makes the consequence explicit. Allocating a global cumulative removal requirement to world regions produces a cumulative target for the EU28 of 32 Gt under an equity principle and 325 Gt under a capacity principle. The quantity therefore varies by a factor of ten depending on the principle applied, and the 2040 target specifies none.

Eligibility

A fourth divergence concerns the question being answered. Four packages disagree about how the target should be structured. However, Ecological Limits does not take part in that disagreement. Instead, it focuses on the eligibility of removals:

- Decarbonisation prioritised, CDR-sector Building, Fair Share and Prior Service all make demands about target architecture, whether separate targets, quantified shares, sectoral boundaries or sub-targets.
- Ecological Limits frame does not make any architectural demand. Instead, the demands of this package are conditions on eligibility rather than positions on structure. It asks which removals should be permitted (on the basis of ecological limits), and not how the target should be divided. This also explains why its carriers almost always mobilise a second package: Ecological Limits

supplies a constraint but not an architecture, so an actor holding it needs another package to state what the target should look like.

4.4. Summary of findings

The first sub-question asked whether climate neutrality functions as a consensus frame. Section 4.1 confirmed it. Nearly all documents endorse it, none contests it as the goal of EU climate policy, and the endorsement covers definitions that are mutually incompatible. The second and third sub-questions asked which frame packages actors mobilise and how each defines the role of removals, and were answered in Section 4.2. Five packages were reconstructed. They treat removals respectively as a residual to be minimised, a capacity to be built, a contribution already made and not counted, a quantity owed under a principle of obligation, and an intervention that takes place in an ecosystem which must be considered. The distribution across actor types shows that the packages are not reducible to the interests of those who mobilise them, except for Prior service. It is the only package in which actor type predicts the frame, since all six carriers represent sectors managing a physical sink or a substitution activity. The fourth sub-question asked whether actors converge or diverge on policy demands. Section 4.3 shows both. Eighteen documents demand separate targets for reductions and removals, and two frame packages produce that demand for incompatible purposes.

5. Discussions

5.1. Climate neutrality as a consensus frame in the carbon removals debate

Consensus frames have so far been identified in concepts that are open by nature. Candel et al. (2014) identify food security in the CAP reform, Ingram (2021) and van der Graaf (2023) identify sustainability in the Farm to Fork strategy and in the biofuels debate. Van Gorp and van der Goot (2012) describe sustainability as malleable, and Mather-Gratton et al. (2021) observe that the result is a discourse in which actors use similar terminology to refer to entirely different assumptions. The present research finds the same structure in the carbon removals debate. Twenty-eight documents refer to climate neutrality, none contests it, and the content given to the term differs from one document to another.

The contribution lies in the type of concept. Food security and sustainability have no fixed metric and no agreed definition. Climate neutrality is quantified, dated, and codified in Article 2(1) of the European Climate Law. Despite this codification, the results show that it did not remove the indeterminacy. It displaced it into the accounting behind it, about the target architecture and the role of carbon removals in it. Article 2(1) fixes an aggregate but not the composition of the balance. CDRterra states the consequence directly, observing that the target will have very different impacts on ecosystems and society depending on whether net zero is reached as the balance of two large gross quantities or of two small ones.

This has an implication for the framing literature. A concept does not need to be vague to function as a consensus frame. It needs to leave one element unspecified, and actors will contest that element rather than the concept itself. Where the unspecified element sits determines where the conflict is fought. In

the present case it is the net, which is why the corpus divides on the type, quantity and durability of removals and not on the objective.

It also has an implication for the debate itself. Candel et al. (2014) argue that food security served as a lynchpin of the CAP reform, allowing the Commission to gather actors with diverse interests behind a shared goal, but that the relationship between the CAP and food security remained ambiguous as a result. The same applies here. Climate neutrality allowed a binding target to be adopted with the support of environmental NGOs, forest owners, utilities, financial actors and carbon removal developers at the same time. Regulation (EU) 2026/667 was adopted in March 2026 and sets a binding reduction of 90% in net GHG emissions by 2040. It also allows for domestic permanent removals under the EU ETS to compensate residual emissions from hard-to-abate sectors. Interestingly, the regulation did not opt for separate targets despite the strong support present in the corpus.

Additionally, the Regulation did not decide on the questions on which the corpus divides: Which removals qualify, how permanence is guaranteed, how reversals are handled, and who may claim the resulting units. As set out in Section 1.3, the 2040 target is a framework decision from which subsequent legislation derives. The remaining open questions are now being decided in the implementation of the CRCF and in the revisions of the EU ETS and of the ESR, all of which were ongoing at the time of writing. The consensus frame therefore enabled the target and deferred the conflict. The debate observed in this corpus has not concluded. It has moved to the instruments supporting the target.

5.2. Frame packages and actor types

The relationship between frames and actor types is contested in the literature. Candel et al. (2014) find that the food security frames in the CAP reform are deployed by specific groups of stakeholders. Farmers' organisations deploy the productionist frame and environmental organisations the environmental frame. They read this as confirming Tomlinson's (2013) argument that actors choose the framing that best matches their prior commitments. The same assumption is also stated by De Bruycker (2017) who writes that farmers voice an agricultural frame and environmental groups an environmental frame, not for strategic reasons but because of the interests they represent.

Van der Graaf (2023) reaches a different conclusion for the biofuels debate, where almost all interest groups across the spectrum, including car associations and the farming industry, used sustainability frames. She draws on van Gorp and van der Goot (2012), who hold that stakeholders with opposite interests will use the same frames because frames differ from ideologies. An ideology refers to the belief system of a stakeholder, whereas a frame clarifies how a given interest presents the issues that matter to it.

The present corpus supports this second position, but not uniformly. Three of the five packages are homogeneous in actor type. Fair share and Ecological limits are carried almost exclusively by environmental NGOs and academic consortia. Prior service is carried entirely by organisations representing sectors that manage a physical sink or a substitution activity. In this package the older assumption holds completely, and actor type predicts the frame.

The two largest packages are not homogeneous. Decarbonisation prioritised is carried by sixteen documents, including eight environmental NGOs but also two academic consortia, two business

associations, a business coalition, a financial group and an electricity producer. For example, EDF and IFOAM mobilise the same frame while representing entirely different interests. Regarding CDR-sector building, it is carried mainly by carbon removal developers and their associations, but also by an environmental NGO and by a market operator.

These findings are consistent with the distinction between frames and ideologies presented above by van Gorp and van der Goot (2012). EDF asks that removals be restricted to hard-to-abate sectors and that sub-targets prevent removals from destabilising the EU ETS. The demand serves a producer whose position depends on a functioning carbon price. The reasoning it uses is the same as the one used by environmental NGOs, namely that removals are not yet reliable enough to be treated as equivalent to reductions. The Clean Air Task Force mobilises CDR-sector building while remaining an environmental NGO, because its position is that geological storage is necessary and requires dedicated support. It shows that actors do not adopt a package that contradicts their interest.

This has a consequence for how framing by interest groups should be analysed. If frames were reflections of actor type, identifying the actor would be sufficient to predict its argument. In this corpus it is not. What distinguishes the packages is the problem they define and not the actors who mobilise them, which is what frame package analysis is designed to recover.

5.3. Limitations

There are multiple limitations to the study that are described in this section.

First, there are multiple limitations linked to the corpus. It was filtered based on the use of two keywords “removal” and “CDR”. This limits the search and, even though, other keywords were analysed, some relevant documents may have been skipped. The corpus is also limited to a specific period of time: the consultation phase of the 2040 target. What is observed here is how interest groups framed carbon removals before any institution had taken a position. It does not cover the whole negotiations period. The positions of the European Parliament and the Council are not included, nor of Member States, and the framing that took place during the interinstitutional negotiations is therefore outside the scope of this research.

The corpus is also limited to public documents. Consultation feedback is written for a known audience and is therefore strategic. What is reconstructed here is the frame package an actor chose to deploy in public, which is not necessarily the reasoning it holds internally or the arguments it uses in direct contact with policymakers. Van der Graaf (2023) addresses this limitation through interviews. This was not possible within the timeframe of the present research.

As described in Section 3.2, two documents were translated into English using online translation software. Framing devices depend on word choice, and translation can alter them. Quotations from these two documents should therefore be treated with caution.

The reconstruction of reasoning devices involves interpretation, and framing can take place at the level of the researcher (van Gorp, 2010). The coding was carried out by a single researcher and could not be triangulated through a second coder or through interviews. Three measures were taken to limit this. Every coded segment is linked to the document and passage it comes from. The aggregated frame packages are reported in full in Tables 2 to 6.

6. Conclusion

This research asked how climate neutrality is framed by EU interest groups in the debate on carbon removals, as expressed in the public consultation on the EU 2040 climate target between March and June 2023. Thirty-one submissions from interest groups were analysed through inductive frame package analysis.

The first sub-question asked whether climate neutrality functions as a consensus frame. This study confirms it. Twenty-eight of the thirty-one documents refer to climate neutrality or net zero, and no document contests it as the objective of EU climate policy. They state what the term is or requires, but the content they give it differs. The divergence concerns the balance between emissions and removals, and what other commitments climate neutrality is taken to carry. It is not stated as a disagreement in any of the documents. The hypothesis set out in Section 1.2 is therefore confirmed.

The second and third sub-questions investigated which frame packages are mobilised and by whom. Five packages were identified. Decarbonisation prioritised treats removals as a residual to be minimised. CDR-sector building treats them as a capacity that must be built before it can be relied upon. Prior service treats them as a contribution the sector already makes and that is not counted. Fair share treats the quantity of removals as a question of obligation rather than of feasibility. Ecological limits treats removals as constrained by the land, water and biomass they require. Ten documents use more than one frame package, and the packages do not correspond to specific actor types except in the case of Prior service.

The fourth sub-question asked to what extent actors mobilising different packages converge on the same policy demands. Eighteen documents ask for reductions and removals to be governed by separate targets, and only one document argues against it. The demand is produced by two packages whose definitions of the role of removals are opposed. Decarbonisation prioritised asks for separation so that removals cannot substitute for reductions. CDR-sector building asks for separation so that industrial removals receive the support their price requires. The former aims to limit the role of removals while the latter promotes their use.

Two conclusions follow. The first concerns the concept of the consensus frame. A concept does not need to be vague to function as one. Climate neutrality is quantified, dated and codified, and it operates in the same way as food security and sustainability because the codification fixed the aggregate and not its composition. What was left unspecified is where the conflict is fought.

The second concerns the debate itself. The 2040 target was adopted in March 2026 and it did not settle the questions on which this corpus divides. Which removals qualify, how permanence is guaranteed and who may claim the resulting units are being determined in the implementation of the CRCF and in the revisions of the EU ETS and the ESR. The consensus on climate neutrality made a binding target possible and deferred the disagreement to the instruments beneath it.

Therefore, understanding how carbon removals are framed remains relevant, because the debate has not ended. It is still ongoing in the EU policy sphere and how it is resolved will shape whether the EU's contribution to limiting global warming to 1.5°C amounts to what the target promises.

7. Bibliography

- Anderson, K., & Peters, G. (2016). The trouble with negative emissions. *Science*, 354(6309), 182-183.
- Beyers, J., Eising, R., & Maloney, W. (2008). Researching interest group politics in Europe and elsewhere: Much we study, little we know?. *West European Politics*, 31(6), 1103-1128.
- Bouwen, P. (2002). Corporate lobbying in the European Union: the logic of access. *Journal of European public policy*, 9(3), 365-390.
- Brad, A., & Schneider, E. (2023). Carbon dioxide removal and mitigation deterrence in EU climate policy: Towards a research approach. *Environmental Science & Policy*, 150, 103591.
- Brad, A., & Schneider, E. (2025). Carbon removal, mitigation deterrence and the politics of target separation. Evidence from the EU 2040 climate target negotiation. *Environmental Research Letters*, 20(5), 054074.
- Brad, A., Haas, T., & Schneider, E. (2024). Whose negative emissions? Exploring emergent perspectives on CDR from the EU's hard to abate and fossil industries. *Frontiers in Climate*, 5, 1268736.
- Candel, J. J., Breeman, G. E., Stiller, S. J., & Termeer, C. J. (2014). Disentangling the consensus frame of food security: The case of the EU Common Agricultural Policy reform debate. *Food policy*, 44, 47-58.
- Carton, W., Hougaard, I. M., Markusson, N., & Lund, J. F. (2023). Is carbon removal delaying emission reductions?. *Wiley Interdisciplinary Reviews: Climate Change*, 14(4), e826.
- Chalmers, A. W. (2013). Trading information for access: informational lobbying strategies and interest group access to the European Union. *Journal of European Public Policy*, 20(1), 39-58.
- De Bruycker, I. (2017). Framing and advocacy: A research agenda for interest group studies. *Journal of European Public Policy*, 24(5), 775-787.
- European Commission. (2023). Climate change – EU target for 2040 (Initiative 13793): Feedback and public consultation. Have Your Say portal. <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13793>
- Entman, R. M. (1993). Framing: Towards clarification of a fractured paradigm. *Journal of Communication*, 43(4), 51–58.
- Gamson, W. A. (1995). Constructing social protest. *Social movements and culture*, 4, 85-106.
- Grant, N., Hawkes, A., Mittal, S., & Gambhir, A. (2021). Confronting mitigation deterrence in low-carbon scenarios. *Environmental Research Letters*, 16(6), 064099.
- Ingram, J. (2021). Framing of the EU Green Deal: A case study of interest group lobbying on the Farm to Fork strategy [Master's thesis, Leiden University].
- IPCC, 2018: Annex I: Glossary [Matthews, J.B.R. (ed.)]. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R.

Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)). Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 541-562.

IPCC. (2022). Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (P. R. Shukla, J. Skeea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, & J. Malley, Eds.). Cambridge University Press.

Losi, L., Fritz, L., & Sovacool, B. K. (2026). Who cares about carbon dioxide removal? Assessing actors, policy positions, and participation modes within European and United Nations public consultation processes. *Climate Policy*, 26(1), 104-119.

Mather-Gratton, Z. J., Larsen, S., & Bentsen, N. S. (2021). Understanding the sustainability debate on forest biomass for energy in Europe: A discourse analysis. *PLoS One*, 16(2), e0246873.

McLaren, D. P., Tyfield, D. P., Willis, R., Szerszynski, B., & Markusson, N. O. (2019). Beyond “net-zero”: a case for separate targets for emissions reduction and negative emissions. *Frontiers in Climate*, 1, 469483.

Mooney, P. H., & Hunt, S. A. (2009). Food security: the elaboration of contested claims to a consensus frame. *Rural sociology*, 74(4), 469-497.

Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law'). (2021). *Official Journal of the European Union*, L 243, 1–17.

Regulation (EU) 2024/3012 of the European Parliament and of the Council of 27 November 2024 establishing a Union certification framework for permanent carbon removals, carbon farming and carbon storage in products. (2024). *Official Journal of the European Union*, L 2024/3012.

Regulation (EU) 2026/667 of the European Parliament and of the Council amending Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality ('European Climate Law'). (2026). *Official Journal of the European Union*.

Sánchez Antelo, A. M. (2025). Framing the EU's agriculture and food policy debate: A Case Study of Farm to Fork Strategy.

Tomlinson, I. (2013). Doubling food production to feed the 9 billion: a critical perspective on a key discourse of food security in the UK. *Journal of rural studies*, 29, 81-90.

van der Graaf, M. F. E. (2023). Framing a wicked problem: EU interest groups and the biofuels debate surrounding the Renewable Energy Directive.

Van Gorp, B. (2007). The constructionist approach to framing: Bringing culture back in. *Journal of communication*, 57(1), 60-78.

Van Gorp, B. (2010). Strategies to take subjectivity out of framing analysis (pp. 84-109). London: Routledge.

Van Gorp, B., & van der Goot, M. J. (2012). Sustainable food and agriculture: Stakeholder's frames. *Communication, Culture & Critique*, 5(2), 127-148.

Woll, C. (2012). The brash and the soft-spoken: Lobbying styles in a transatlantic comparison. *Interest Groups & Advocacy*, 1(2), 193-214.

Declaration on the use of artificial intelligence: An AI assistant (Gemini) was used to review any language mistakes (spelling, grammar, vocabulary). It was not used to generate intelligence and all analyses and content are the author's own. This is in concordance with Article 107 of the RGEE 22-23 as instructed in "Consignes-TFE-EN" for the academic year 2025-2026.