

Certification of carbon removals – EU rules

Fields marked with * are mandatory.

Introduction

Responding to the urgency of climate action highlighted in the successive assessments of the Intergovernmental Panel for Climate Change (IPCC), the European Union has set in law its objective of economy-wide climate neutrality by 2050. The European Climate Law requires greenhouse gas (GHG) emissions and removals to be balanced within the European Union at the latest by 2050, with the aim of achieving negative emissions thereafter. Each single tonne of CO₂eq emitted into the atmosphere will have to be neutralised by a tonne of CO₂ removed from the atmosphere. To scale up carbon farming and industrial solutions for removing carbon from the atmosphere, the European Commission is working towards a legislative proposal in 2022 on a regulatory framework for the certification of carbon removals.

As underlined in the Communication on Sustainable Carbon Cycles, the establishment of the certification framework will be an essential stepping stone towards the transparent recognition of activities that remove carbon from the atmosphere in an environmentally sound manner. The certification rules should therefore set scientifically robust requirements for quality of measurement, monitoring, reporting and verification of the carbon removed from the atmosphere, the duration of the storage, the risk of reversal and the risk of carbon leakage increasing GHG emissions elsewhere. Requirements should also be set for the amount and type of energy used for the carbon removal process. The certification rules should put in place robust safeguards to make sure that carbon removal activities do no harm to biodiversity and other sustainability objectives. This is important to ensure that the EU can claim domestic climate neutrality while helping to achieve other objectives of the European Green Deal.

This public consultation invites public administrations, academic institutions, businesses, organisations and individuals to contribute to the preparation of an EU regulatory framework for the certification of carbon removals. The findings of the consultation (which will be summarised and published) will inform the impact assessment accompanying the Commission proposal on this initiative.

Guidance on the questionnaire

This public consultation consists of some introductory questions on your profile, followed by a questionnaire. Please note that you are not obliged to reply to all questions.

At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire and uploaded position papers and policy briefs will be published online. Please read the specific privacy statement attached to this consultation stating how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives (if you have not already done so). Registering commits you to complying with a code of conduct. If you do not wish to register, your contribution will be handled and published with contributions received from individuals.

About you

* Language of my contribution

- Bulgarian
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- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
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- Maltese
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* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Anna

* Surname

Dubowik

* Email (this won't be published)

anna.dubowik@negative-emissions.org

* Organisation name

255 character(s) maximum

Negative Emissions Platform

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

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- Bosnia and Herzegovina
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- Brazil
- British Indian Ocean Territory
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- Brunei
- Bulgaria
- Burkina Faso
- Burundi
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- Cayman Islands
- Central African Republic
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- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
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- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
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- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
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- Papua New Guinea
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- Tonga
- Trinidad and Tobago
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- Uganda
- Ukraine
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Nevis | <input type="radio"/> Zimbabwe |
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* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose

behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Questions

Scope

Question 1: What in your view are the main challenges regarding the integration of carbon removal in EU climate policies?

at most 3 choice(s)

- Ensuring that strong action to reduce emissions is not undermined by shifting focus on carbon removals.
- Ensuring a net contribution from removals to the achievement of climate neutrality.
- Ensuring precise, accurate and timely measurement for removals.
- Providing sufficient guarantees for the duration of carbon storage and the prevention of reversals.
- Avoiding potential negative environmental impacts and complying with sustainability principles.
- Fostering cost-effective carbon removal solutions.
- Guaranteeing transparency of the benefits and costs of carbon removals.
- Setting appropriate baseline and demonstrating the additionality of removals.
- Other

Question 2: What should be the main criteria defining the types of carbon removals that EU climate policies should incentivise?

at most 3 choice(s)

-

Technical readiness and economic feasibility

- Potential for deployment at large scale
- Robustness of monitoring, reporting and verification aspects
- Affordability of monitoring, reporting and verification aspects
- Duration of carbon storage
- Risk of intentional or unintentional reversal of carbon removals
- Potential environmental co-benefits
- Potential social benefits
- Other

Question 3: Taking account of the aspects identified in the previous question, what carbon removal solutions should EU climate policies incentivise and in what time horizon?

Carbon farming solutions enhancing ecosystem removals

	As soon as possible	After 2030	Towards 2050	Never	No opinion
Afforestation under ecological principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reforestation and forest restoration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sustainable forest management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agroforestry and mixed farming	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase of soil organic carbon on mineral soils	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase of soil organic carbon on organic soils	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Wetlands and peatlands restoration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Costal marine ecosystem restoration and preservation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify:

500 character(s) maximum

Industrial solutions for carbon removals

	As soon as possible	After 2030	Towards 2050	Never	No opinion
Biochar	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct air capture with long-term or permanent carbon storage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bioenergy with carbon capture and long-term or permanent storage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Geological storage of non-fossil CO2	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bio-based products with long lifetime (including for construction)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Utilisation of non-fossil CO2 in long lifetime products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced rock weathering	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

500 character(s) maximum

Would you have any additional comments on scope, please specify:

2500 character(s) maximum

Re- Q1: NEP strongly believes that ensuring i) a net contribution from removals, ii) precise, accurate and timely measurement as well as iii) sufficient duration of the carbon storage should be understood as priorities, rather than challenges regarding the integration of carbon removal in EU climate policies. CDR projects (such as BECCS, PyCCS and DACS) have shown that there are readily available solutions to these “challenges”. The storage duration of CDR methods differs substantially, from several years to permanent storage. In order to signal CDR methods with less durable storage, NEP encourages the EU to treat long term storage different from shorter termed storage and make for either, a higher evaluation or restrictions towards usage of long-term storage methods only, whenever CDR methods are used to “balance” fossil emissions.

The most recent IPCC contribution outlined three roles for carbon removals for the achievement of the temperature targets: 1) In achieving net negative emissions, 2) in compensating for hard to abate emissions in order to realize a state of net-zero and 3) contributing towards minimized cumulative emissions flowing to the atmosphere, well before a net-zero state is reached. On this ground, we stress the need to establish compliance policies for atmospheric carbon capture (via photosynthesis or chemical processes) and storage. Science is clear that the majority of emissions should be addressed via consequential avoided emissions and emission reductions. NEP stands in favour of such measures and encourages the EU to increase ambitions and actions in line with scientific assessments. However, developing carbon removals under the same set of policies focussing on emission reductions increases the (perceived) substitution effect between

carbon removals and emission reductions. It is also presenting hurdles to the achievement of carbon removals at scale, since permanent removals experience different cost structures that are unlikely to benefit from emission reduction policies. To effectively contribute to the achievement of European climate targets in a sustainable manner, dedicated carbon removal policies and/or incentive structures are needed. A gradual phase-in is needed in order to scale the emerging CDR industry in a sustainable manner: Interim removal targets for the years 2025, 2030, 2035,... and associated policy instruments are needed in order to smoothen the scale up curve and provide clear signals to project developers.

The benefits of a certification framework to scale up high-quality carbon removals over the coming years

Question 4: Would you agree that establishing a robust and credible certification system for carbon removals is the first essential stepping stone towards achieving a net contribution from carbon removals in line with the EU climate-neutrality objective?

- Yes
- No
- No opinion

Question 5: What would be the main objectives for the certification of carbon removals?

at most 3 choice(s)

- To increase the transparency and level playing field of voluntary carbon markets.
- To allow comparability and competition between different carbon removal solutions
- To provide better public incentives for nature-based and industrial carbon removals in EU and national funding programmes.
- To provide better financial incentives for land managers (e.g. purchasers of food and biomass products reward climate-friendly agriculture through price premiums or incentive payments – often called ‘in-setting’).
- To provide better financial incentives for carbon-storage products (e.g. bio-based products, woody construction material).
- To increase transparency in corporate sustainability reporting and foster the credibility of climate-neutrality claims.
- To support the labelling of sustainable products.
- Other

The role of the EU in the certification of carbon removals

Question 6: Which role should the EU take in the certification of carbon removals?

- Voluntary carbon markets work well. There is no need for an additional intervention by the EU.
- The EU should establish minimum standard requirements on reporting transparency for carbon removals.
- The EU should establish comprehensive standard requirements for carbon removals, e.g. on monitoring, reporting and verification, on the duration of the removal or baseline setting and additionality.

Question 7: What functions in the certification process should be carried out by private or public entities?

	Independent private entities	Public administration	No opinion
Establishment of certification methodologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establishment of the system for accreditation of certification bodies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Validation of the carbon removal project (ex-ante)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Verification of removals made (ex-post)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Would you have any additional comments on the role of the EU in the certification, please specify:

2500 character(s) maximum

Re- Q4: Whilst NEP agrees that the certification of removals is an essential stepping stone towards a contribution of removals in European climate policies, current developments show that it doesn't have to be the first. We encourage the commission to think of CDR in need of several stepping stones to be developed in parallel. The wider context, e.g. outlined in the communication on restoring sustainable carbon cycles, the ongoing debates over the integration of DACS and BECCS under the F55 package and the overall role of removals under European climate policies present equally important stepping stones towards the integration of removals in European climate policies.

Re- Q6: We stand in favour of both, common minimum standards and comprehensive assessments. The former can be developed by the end of this year, where we foresee more time necessary to provide for the latter.

Re- Q7: We see the possibility of methodology development from non-public authorities as a great opportunity. In line with methodology developments on voluntary carbon markets, the CRC-M should separate methodology development and approval. Whilst official European bodies hold a final say over methodology approval, their development should be made possible with inputs and/or consultations by the wider stakeholder groups. Regarding validation and verification, NEP encourages a thriving ecosystem of validation and verification entities and processes that can stem from either public or private entities.

General: Beyond dedicated removals legislation, we acknowledge and welcome that the EU CRC-M likely

impacts developments on voluntary carbon markets. NEP sees this as an essential co-benefit of the CRC-M, but stresses that VCM regulation remains a co-benefit, rather than a main priority of the CRC-M. We encourage the commission to keep the focus on possible ways to integrate carbon removals in a compliance framework and to provide this much needed policy signal. For the development of methodologies, we strongly believe in possibilities of learnings and synergies with VCM initiatives and encourage the commission to rely on expertise of non-EU mechanisms to provide its own CRC-M.

Certification methodologies

Question 8: Carbon removal solutions can differ significantly, for example as regards duration of removals or robustness of monitoring, reporting and verification. In this context, do you think an EU certification framework should allow different types of certificates for different types of removals?

- The EU certification framework should define only the minimum criteria for the certification and should not comprehensively define the certificates.
- The EU certification framework should only allow a single type of certificate to ensure equivalence of certified carbon removals.
- The EU certification framework should allow different types or sub-categories of certificates to better reflect the diversity of carbon removal solutions and their characteristics.

Question 9: Apart from diverging durations of existing carbon removal solutions, storage may also be prematurely interrupted and carbon may consequently be released back into the atmosphere. What approach could better manage this risk of intentional or unintentional reversal of carbon removals?

- Make removal providers liable for any reversal of removals and require them to offset any reversal.
- Encourage or require carbon removal providers to set up insurance systems or multi-project pooling mechanisms.
- Require commitment to multi-year monitoring plans at the outset of the certification procedure.
- Issue certificates with specific durations (e.g. 5, 7 or 10 years) that can be renewed.
- Require methods with a risk of reversal to be discounted or require a share of the removals to be stored in a buffer account (e.g. 10 to 25 per cent of the expected removals).
- Other

Please specify:

For CDR methods relying on geologic storage, the CCS directive makes for a readily available solution to cover the aspects of liability and risks concerning future reversals. Project developers engaging with geological storage face requirements in terms of liability, insurance mechanisms and multi-year monitoring plans that reflect a specific reservoirs' characteristics. Similar stringency for methods not relying on geologic sequestration is welcome in cases where credits are treated fungible.

Question 10: In voluntary carbon markets, the use of baseline and additionality concepts aims to quantify and reward only additional removals, i.e. those that go beyond a pre-identified baseline and would not have occurred in the absence of the incentives from the carbon removal mechanism. To what extent do you think the EU certification framework should include the concepts of baseline and additionality?

- The EU certification should establish a single methodology to define the baselines and assess additionality.
- The EU certification framework should allow for a variety of baselines and additionality criteria to cater for different types of removals.
- To best adapt to the use of the certificates in a specific context, the certification framework should not prescribe definitions for baseline and additionality criteria.
- Other

Question 11: What information should the certification for carbon removal disclose?

- Type of carbon removals
- Quantity of carbon removed
- Information on the carbon removal provider
- Information on the certificate owner
- Information on monitoring, reporting and verification processes
- Duration of carbon storage
- Risk coverage and safeguards on sustainability objectives
- Environmental benefits
- Social benefits
- Information on the baseline and additionality of the removal
- Information on the use of the certificate and its contribution to the Paris Agreement with a view to avoiding double counting
- Price if the certificate has been traded
- Other

Would you have any additional comments on on certification methodologies, please specify:

2500 character(s) maximum

According to the newest IPCC report, CDR methods can help threefold: 1) to reduce cumulative emissions to the atmosphere, 2) to address emissions from hard to abate sectors and 3) to neutralize historic emissions. Not all CDR approaches have the ability to contribute to these options equally, mainly depending on the storage duration of projects. A project that is sequestering carbon for a short time has the ability to reduce cumulative emissions to the atmosphere for as long as the carbon remains stored. Further, it is unlikely to contribute to the other two objectives in a sustainable way. Therefore, we encourage the EU to restrict fungibility of CDR credits to emission sources based on a similar duration of carbon storage. This makes for a conservative usage of CDR credits where the climate impact can be seen as “truly neutralized”, whenever applicable. Consequentially to such a restriction in fungibility, several different types of credits could thus be issued for usage with different purposes and present a meaningful incentive structure to both, i) CDR deployment overall and ii) usage of long durability credits in sectors where most relevant. CDR deployment is incentivized as the past years and voluntary carbon markets have outlined with a great demand for CDR from all sectors, whilst stipulating a lack of standards to inform buyers. Thus, European credits can make for a much needed standard that is in line with the European objective to integrate CDR in compliance policy in the future.

Re- Q11: Additionality

We strongly believe in financial additionality, whenever carbon removal credits (CRCs) are to be traded and used e.g. to make for the neutralization of emissions. Of equal importance we see the development of a registry of carbon removals (and reversals, where applicable) in order to guide European policies that mustn't have a sole focus on carbon removal transactions. Throughout this response, we outlined the need to treat removals as a dedicated part of the portfolio of options necessary to achieve European climate targets. Having a clear understanding of activities within a corresponding registry (irrespective of removals being transacted or not) is a fundamental step to any incentive structure for carbon removals.

Final remarks

Finally, are there any other important aspects that should be considered in establishing a regulatory framework for the certification of carbon removals in the EU?

- Yes
- No

Please provide your additional remarks:

5000 character(s) maximum

Please see the attached position paper.

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Any document you upload will be published alongside your replies to the questionnaire, which is the essential input for this public consultation. An uploaded document is an optional addition and will serve as further background reading to better understand your position.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

54444e93-10b5-4a2e-8ba2-86c81764e41d/Position_Paper__Integration_of_CDR_in_EU_Policy_NEP.pdf

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