



September 27, 2022

The Right Honorable Jacob Rees-Mogg MP
Department for Business, Energy and Industrial Strategy
1 Victoria Street
London, SW1H 0ET, United Kingdom
RE: Open [consultation](#) for greenhouse gas removals (GGR) business models

Dear Secretary Rees-Mogg,

Thank you to you and the Department for Business, Energy and Industrial Strategy for your leadership advancing carbon and greenhouse gas management climate solutions. The Carbon Business Council, a nonprofit trade association of more than 65 carbon management companies headquartered around the world, appreciates your invitation to respond to the open consultation about greenhouse gas removals business models.

We applaud the UK government's goal to design projects that target residual emissions and decarbonisation while providing new economic opportunities. These goals will have global impacts, helping enable a safe, effective, and sustainable climate future. There are multiple approaches that are ready to be demonstrated that reduce carbon emissions and remove carbon dioxide from the atmosphere, as noted already by the UK government with your [£54 million in government funding for GGR technologies](#).

The Carbon Business Council is a technology-neutral trade association that focuses on carbon dioxide management, including startups that are working on nature-based, ocean-based, and technological carbon management solutions. Our member companies advance climate restoration in unison, recognizing that there is not a one size fits all approach. Nearly 14 percent of our members are located within the United Kingdom. At this juncture, encouraging projects that take a range of approaches can help expedite the growth of the industry and realize the UK government's goal for carbon removal to decrease costs while expediting scalability.

As the UK weighs project design and new business models, we urge you to take a technology neutral approach to carbon management, noting that it is too early to choose winners in this climate fight. Removing and managing gigatons of carbon dioxide and other greenhouse gasses will require multiple approaches and it would be premature to prioritize one solution over another, especially as they continue to scale through the coming decade. We have appreciated seeing the diversity of [project types](#) formerly selected to meet your net-zero goals and encourage that as market frameworks continue to be developed, that they allow for all carbon removal to have a shot at viability. We recently published a [white paper](#) covering carbon removal in voluntary carbon markets if you are interested in learning more about our recommendations, especially as the UK itself hosts a variety of voluntary carbon markets companies.



We encourage the Department for Business, Energy and Industrial Strategy's inclusion to incorporate social and institutional context into project design. With an emphasis on minimizing any adverse environmental or community impacts, some carbon and other greenhouse gas management approaches may be more costly than others with various storage approaches. There will be many trade offs to consider in the cost of a project, including the length and permanence of carbon dioxide storage.

The best project for a community that offers maximum local benefits may not always be the lowest bidder. With this in mind, we encourage the Department for Business, Energy and Industrial Strategy to incorporate a broad suite of externalities into your overall cost estimates. This can include factors like technological readiness, technology accessibility, and permanence of CO₂ storage. The Carbon Business Council believes that multiple considerations, in addition to cost per ton, are paramount to the responsible growth of the carbon management and overall greenhouse gas removal industry.

We look forward to working with the Department for Business, Energy and Industrial Strategy in 2022 and onwards and are grateful for your leadership.

Sincerely,

Benjamin Rubin

Ben Rubin

Executive Director, Carbon Business Council