



December 23, 2024

Mr. Brad Crabtree
Assistant Secretary
Office of Fossil Energy and Carbon Management
U.S. Department of Energy
RE: Carbon Management Strategy
Submitted via email to carbonmanagementstrategy@hq.doe.gov

Dear Assistant Secretary Crabtree and the FECM Team:

The [Carbon Business Council](#) (CO2BC) is a nonprofit coalition of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to comment on the U.S. Department of Energy (DOE) [Draft Carbon Management Strategy](#) ("Draft Strategy") that was published on October 10, 2024.

First and foremost, the CO2BC and our membership would like to commend you and your colleagues at the DOE Office of Fossil Energy and Carbon Management (FECM) for your work on this Draft Strategy – and express our gratitude for FECM's leadership to implement bipartisan legislative directives to advance carbon management and carbon dioxide removal (CDR) in the U.S. and globally. Carbon management and CDR are essential components of the U.S. climate mitigation strategy and, while much work remains to be done, they are at a far more developed stage today with the FECM's leadership.

We understand the Draft Strategy's scope and focus on carbon capture and storage (CCS), direct air capture (DAC), and accompanying infrastructure such as carbon dioxide storage and transport. We applaud the DOE's continued strong support for DAC, other carbon management approaches, and enabling infrastructure.

We also note, per page 6 and footnote 14 of the Draft Strategy, that a more comprehensive CDR Strategy is forthcoming in the form of an Interagency Task Force Report for Congress. We encourage DOE to emphasize in this forthcoming Report the continued bipartisan support of technology neutral policy (for both CDR supply / production and [demand](#)) to advance the [broad portfolio of CDR approaches](#) necessary for the U.S. to meet our climate mitigation goals. This portfolio includes, in addition to DAC, biomass carbon removal and storage (BiCRS); mineralization based approaches such as [enhanced weathering](#) and waste product mineralization; [marine CDR](#) (mCDR); and potentially as yet undiscovered CDR methods, highlighting the continued importance of maintaining strong investment in research and development (R&D).

We would be pleased to discuss these points further with you if additional information or clarification would be helpful, and please let us know if there is anything the CO2BC can do to



support this Draft Strategy. We very much appreciate the important work that you do, and the opportunity to submit this input for your consideration. We and our membership are gratified by the strong and sustained bipartisan support for CDR, and we look forward to continuing to work with DOE and the rest of the federal government to advance the field in 2025 and beyond.

Sincerely,

Benjamin Rubin

Ben Rubin
Executive Director, Carbon Business Council

Isabella Corpora

Isabella Corpora
Director, Carbon Business Council

Principal Point of Contact:

Isabella Corpora, Director
Carbon Business Council
isabella.corpora@carbonbusinesscouncil.org
(760) 855-8949