

September 15, 2023

The European Commission
Re: EC Call for Input on Industrial Removal Certification Methodologies
Submitted via [EUSurvey](#)

Dear Madams and Sirs:

The [Carbon Business Council](#) (CO2BC) is a nonprofit trade association of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents, and we appreciate this opportunity to offer the following comments in response to the European Commission's Call for Input on Industrial Removal Certification Methodologies.

High-quality monitoring, reporting, and verification ([MRV](#)) is essential and integral to building the trust required to scale carbon dioxide removal (CDR) to the massive levels needed to reach net zero by 2050 and have a chance to limit warming to 1.5 or even 2°C.^{1 2} As such, the CO2BC applauds the focus and emphasis that the European Commission (EC) is placing on the critical question of developing high-quality CDR certification methodologies via the [EU Carbon Removal Certification Framework](#) (CRCF).

We are concerned, however, by the EC's apparent selection of a limited number of "industrial" CDR pathways for consideration and inclusion in the CRCF. It is important to highlight that CDR encompasses a range of methods and technologies, from land-based soil and forest carbon sinks; biomass-based carbon removal and storage ([BiCRS](#)); to marine carbon dioxide removal ([mCDR](#)); to [mineralization-based approaches](#); to direct air capture ([DAC](#)) – as well as emergent and potentially as yet undiscovered approaches.

Instead of selecting only a small number of specifically named CDR approaches for inclusion, the CO2BC strongly recommends a method-neutral, criteria-based treatment of "industrial" CDR in the CRCF regulatory text – as outlined in our recently published issue brief "[Defining CDR](#)."³ A CRCF that avoids lists and labels, and instead focuses on the specific criteria of each individual CDR approach, will best incentivize continued development and scaling of the portfolio of CDR methods needed to meet Europe's climate goals. We believe the CRCF's [Q.U.A.L.I.T.Y](#) criteria offer a helpful foundation for such a framework, and it is essential that the CRCF allow any CDR approach or project that meets these criteria to qualify for potential future inclusion in key EU climate policy mechanisms.

¹ [IPCC AR6 Synthesis Report](#) p 50

² [Monitoring, Reporting, and Verification](#), Carbon Business Council, May 2023.

³ "[Defining Carbon Removal](#)," Carbon Business Council, May 2023.



The CO2BC agrees with the EC's apparent current thinking that while certain CDR approaches are ready for incorporation into EU policy today, others might need more time to develop – and still others remain to be discovered or invented. The CDR sector is advancing incredibly quickly, and it is essential that the CRCF include a clear, workable, and expeditious mechanism for the approval of new certification methodologies as they become mature and ready for inclusion in EU policy. It is critical that this mechanism be administrative, and capable of being engaged at any point in time via the existing CRCF, rather than necessitating additional parliamentary action. Meeting Europe's climate goals will require a balanced and diversified portfolio of CDR methods, and it's vital that all high-quality approaches be eligible as they become ready for policy support and to help spur innovation.

We would be very pleased to discuss these points further with relevant parties at the EC. We very much appreciate the important work you do, and thank you again for the opportunity to submit this input for your consideration.

Sincerely,

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