



## **Response to DOE FECM RFI 2023-17218: Regarding Launching a Responsible Carbon Management Initiative**

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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. We very much appreciate the work FECM continues to do to advance the responsible deployment of carbon management, and the opportunity to respond to this [Request for Information](#), Regarding Launching a Responsible Carbon Management Initiative. We have responded to questions 1-6 below.

### **1. Would the Initiative and the Principles be likely to meaningfully advance responsible carbon management? If not, what changes could be made to better advance this goal?**

The Initiative and Principles highlight the federal government’s prioritization of responsible deployment, which sends an important signal in private sector investment and policies. The Initiative could benefit from enshrining responsible deployment into policy through legislation, to ensure the work continues in the decades to come.

### **2. At a high level, do the Principles address what is needed for responsible carbon management? If not, what additional principles may be needed?**

The Principles align with CO2BC’s [Ethical Oath to Restore the Earth](#), a premier ethical standard for the carbon management industry, with more than 120 signatories.

The scientific consensus is clear that gigatons of carbon removal are needed to meet the goals of the Paris Agreement. This work must continue in tandem with the crucial work of reducing emissions. The Carbon Business Council supports “twin targets,” a topic expanded on further by CO2BC’s Executive Director, Ben Rubin, in a [Fast Co op-ed](#). We encourage a principle related to twin targets as a way to showcase that carbon management works in concert with emissions reduction.

### **3. In what ways, if any, could the Principles be revised to better reflect responsible carbon management?**

The Principles should be reflective of, and adaptive to project scope – as a small pilot would have a very different level of impact and scale of responsibility than a large plant, in addition to the type of carbon management. For example, pilot projects for enhanced rock weathering and biomass burial similarly have a different scope in comparison to the buildout of an industrial-scale facility.



Community Engagement Principles should emphasize the importance of directly engaging with community members “[from the ground up](#),” as core stakeholders and/or rightsholders of projects. Project benefits benefit from being defined by the community, and scoped proportionately to the project’s scale, type, and impact.

Tribal Consultation Principles should highlight the need to obtain Free, Prior, and Informed Consent from Tribes before deployment. Health and Safety Principles should require the establishment of accountability mechanisms to determine responsible parties and associated actions if health and safety is compromised.

**4. Once finalized, would you agree to pledge to abide by or endorse the Principles? If not, what changes could be made to Phase 1 to encourage you to pledge to abide by or endorse the Principles?**

As a nonprofit trade association committed to responsible deployment and scaling of carbon management solutions, the Carbon Business Council plans to pledge to abide by the Principles. To ensure success, we strongly encourage Principles to be incorporated into policy and broader funding decisions relevant to carbon management. Aligning the principles with existing federal programs will also help to streamline the process for companies and all signatories.

**5. How could Phase 2 and a recognition program be structured and executed to maximize adoption of the Principles?**

Providing funding for project developers to develop internal capacity for responsible deployment is an impactful pathway to maximize adoption of the Principles. An ecosystem approach is needed to execute the maximized adoption of the Principles. The FOA should be opened up to nonprofit and academic institutions with commitment and ability to support responsible deployment through the development of resources. Published research on responsible deployment of carbon management approaches is also lacking and could benefit from dedicated funding.

**6. Would the technical assistance envisioned in Phase 2 be helpful to advance responsible carbon management projects? Would you take advantage of this service or encourage others to take advantage? If not, why not?**

Technical support and assistance for carbon management companies will help to uphold and advance the Principles. The Carbon Business Council would welcome the opportunity to collaborate with DOE and FECM to support these efforts. The Carbon Business Council leads the [Carbon Dioxide Removal Responsible Deployment Training](#) and will be releasing an online training this fall focused on responsible deployment. We also organize events, such as the [Symposium for Carbon Removal Deployment](#), which assembled carbon removal stakeholders to learn about actionable information for how projects can be deployed responsibly.