

Cascade Climate response to the Call for input 2025 - Applicability of removal guidance to emission reductions activities and vice versa

Cascade Climate is a philanthropy-backed climate not-for-profit organization focused on addressing aspects of the climate challenge that are underrepresented and under resourced in the current global climate strategy. These challenges—which have potential for significant impact on the climate and our way of life—are unlikely to be resolved through decarbonization alone.

For these emerging climate solutions, Cascade helps remove the biggest bottlenecks to progress by coordinating ambitious cross-sector initiatives, building tools and infrastructure to unlock cycles of learning-by-doing, and resourcing high-leverage R&D and policy work. Our initial focus is on Enhanced Rock Weathering (ERW) as a promising carbon removal and agronomic solution.

One of our flagship efforts in ERW has been the development and publication of our [Foundations for Carbon Dioxide Removal Quantification in ERW Deployments](#) report. This document is the culmination of a multi-stakeholder process involving approximately 50 academic scientists, 20 ERW project developers, and various not-for-profit organizations.

We'd like to share Cascade Climate's perspective on ERW quantification building on our Foundations framework.

1. Activity-Specific Monitoring Approaches

We support Paragraph 8 which states that emission reduction or removal activities with reversal risks should have activity-specific requirements. This recognises that some activities have greenhouse gas reservoirs which aren't under the activity participant's control, and GHG reservoirs aren't co-located with the mitigation activity.

The document refers to paragraph 88 in places and we assume that these references should all be paragraph 8.

2. Integration of Safeguards


Cascade Climate supports that all activities must apply robust environmental and social safeguards, minimize negative impact and respect human and indigenous rights. Section 6.2.3 of the Foundations document recommends the development and adherence to a Health and Safety Risk Assessment for all projects. To mitigate risk of heavy metal accumulation, we further recommend requiring project developers to perform a conservative mass balance calculation using the baseline soil and feedstock measurements and soil conditions prior to

application. We have developed an ERW metal accumulation calculator to help project developers, policymakers, and other stakeholders compare accumulation risks against existing regulations

3. Science-Driven Methodology Evolution

Cascade believes that methodologies must incorporate emerging scientific insights. We support that section 3.2.7, paragraph 33, which states that, “*at the renewal of the crediting period, the activity participants shall apply the latest version of the applicable methodology*”. This ensures ERW quantification remains aligned with advancing science. This aligns with our recent recommendations around a potential ERW methodology under the EU’s Carbon Removal and Carbon Farming regulation. To ensure methodologies keep pace with scientific progress, we recommend a recurring review process (e.g., every 2 years).

We thank the Methodology Expert Panel for recognising that some pathways require activity-specific requirements and we would welcome the opportunity to share our latest work on ERW.

CALL FOR INPUT	
	
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<i>Date of submission</i>	23 June 2025

Instruction: Enter your input in the table below.

Document reference number and title: A6.4-MEP006-A02. Concept note: Applicability of removal guidance to emission reductions activities and vice versa (version 01.0)				
Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	Section 3	Paragraph 8	<p>We support Paragraph 8 which states that emission reduction or removal activities with reversal risks should have activity-specific requirements. This recognises that some activities have greenhouse gas reservoirs which aren't under the activity participant's control, and GHG reservoirs aren't co-located with the mitigation activity.</p> <p>The document refers to paragraph 88 in places, and we assume that these references should all be paragraph 8.</p>	
2	3.2.10	37	<p>Cascade Climate supports that all activities must apply robust environmental and social safeguards, minimize negative impact and respect human and indigenous rights. Section 6.2.3 of the our Foundations for CDR Quantification in ERW deployments document recommends the development and adherence to a Health and Safety Risk Assessment for all projects.</p>	

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3	3.2.7	33	Cascade believes that methodologies must incorporate emerging scientific insights. We support that section 3.2.7, paragraph 33, which states that, <i>"at the renewal of the crediting period, the activity participants shall apply the latest version of the applicable methodology"</i> . This ensures ERW quantification remains aligned with advancing science. This aligns with our recent recommendations around a potential ERW methodology under the EU's Carbon Removal and Carbon Farming regulation. To ensure methodologies keep pace with scientific progress, we recommend a recurring review process (e.g., every 2 years).	
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