Brussels, 11 April 2023

Submission by 44.01 to the Call for input 2023 - Structured public consultation: Requirements for the development and assessment of mechanism methodologies.

44.01 welcomes the opportunity to provide comments to the Article 6.4 mechanism Supervisory Body with respect to non-permanence and reversals aspects of the mechanism methodologies under developemnet and assessement.

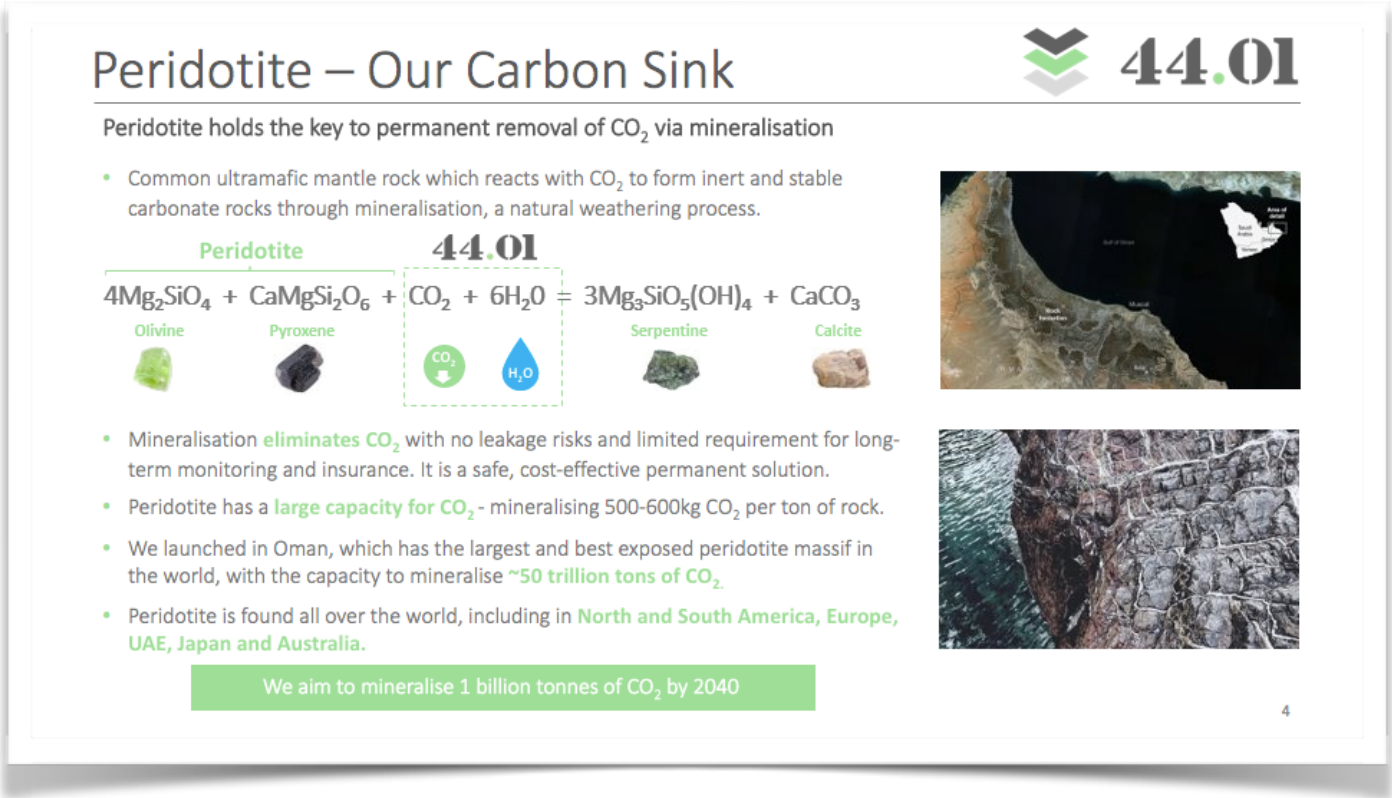
44.01 - the solution we propose

In order to achieve the ambitious goals of keeping global temperature below agreed thresholds, it is no longer sufficient to simply reduce greenhouse gas emissions. Instead, it is clear that we need to actively remove CO2 that has already been released into the atmosphere. A major problem is how to safely store this CO2 in a way that does not produce additional environmental damage and does get re-released back into the atmosphere.

- The technology behind 44.01 (where 44.01 refers to the molecular mass of CO2) consists of converting captured CO2 into inert rocks in geological reservoirs through ***carbon mineralization***.

- Our innovative method makes use of a naturally occurring reaction between peridotite (a rock found in the Earth's crust) and CO2, which results in the formation of minerals that remain ***stable for millions of years.***

- Our technology provides an ***easier, scalable, safe way to permanently eliminate potentially the entire accumulated anthropogenic CO2 emissions.***



44.01 comments related to non permanence and reversals:

1) 44.01 proposes to clearly differentiate between geological storage methods and elimination of CO2 through subsurface mineralisation across the documents, and their future interations, serving as input into development of methodologies:

For example Re- Information note Removal activities under the Article 6.4 mechanism, 3.1. Taxonomy of removal activities:

- para 37 b) “Storage in geological reservoirs, or ~~storage~~ *elimination* through mineralization of CO2 in subsurface rocks.”

- para 38 Table 2 “DACCS activity with the removed carbon ~~stored~~ *eliminated* through subsurface mineralization in rocks”

2) The Information note Removal activities under the Article 6.4 mechanism outlines requirements appropriate for the conventional method of CO2 storage in geological formations, such as “*pooled buffer of credits backed up by host Party guarantee, or pooled buffer of credits backed up by commercial insurance*”, which are not appropriate for CO2 elimination via mineralization.

We recommend that the methodologies take into account the specific attributes of mineralization and separates the requirements appropriate for mineralisation as opposed to conventional storage in geological reservoirs. In this respect, the independently validated methodology (such as the one developed by Carbfix) or methodlogies currently under development by VCS should serve as input to Art 6.4M in particular with respect to the formulation of liability requirements of activity partcipants.

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