



CALL FOR INPUT ON METHODOLOGIES REQUIREMENTS, APRIL 2023

INPUT TO QUESTIONS RAISED BY THE ARTICLE 6.4 SUPERVISORY BODY

Document Prepared by the CCS+ Initiative

Title	Input to questions raised by the Article 6.4 Supervisory Body
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The CCS+ Initiative welcomes the opportunity to provide input into the questions raised by Article 6.4 Supervisory Body (SB). Please find in the following our answers to some of the questions. As the Initiative works on methodology development for activities involving Carbon Capture and Storage (CCS), Carbon Capture and Utilization (CCU) and Carbon Dioxide Removal (CDR), we focus on questions related to such activities.

Question 14: Are there classes of project, or levels and lifetimes of emissions that might be favored in a positive list?

Answer: Projects involving technical removals with permanent storage could be favored in positive lists. Technical removals are so far not implemented on a large scale, but rather as pilot projects. Such projects are to date not demanded by climate policies and unconditional NDCs, which points towards their regulatory additionality. Furthermore, some technical removals (e.g. Direct Air Capture with Storage, DACS) do not have a revenue stream other than carbon finance, indicating financial additionality.

Under the CCS+ Initiative (see background section below), efforts are under way to develop positive lists for technical removal projects in addition to the Initiative's investment analysis approach for additionality testing.

Question 30: Where are non-permanence risks in respect of emission reductions?

Answer: Many Carbon Capture and Storage / Utilization (CCS/CCU) applications result in emission reductions. Such applications prevent the CO₂ from being emitted into the atmosphere, by capturing it at the source and storing it into products, in geological formations or via mineralization. Storage methods and products suited for utilizing CO₂ are heterogeneous. The durability of related emission reductions is tightly connected with the permanence of storage and/or utilization methods. Typically, CO₂ storage in the living biosphere is characterized by low permanence, while other storage methods such as geological storage in aquifers or in via mineralization in stones potentially lock away CO₂ for geological timescales. Similarly, utilization of CO₂ in some products (e.g. in fizzy drinks) lead to almost immediate re-emission, while others (e.g. in cement) are long-term. Storage and utilization methods including a high risk of re-emissions must be treated carefully, if real emission reductions shall be achieved.

Question 31: How are these typically addressed, what are the options?

Answer: The CCS+ Initiative will submit its methodologies to Verra / Verified Carbon Standard. The CCS+ Initiative provided inputs to Verra's Non-Permanence Risk Tool for Geologic Carbon Storage¹. The tool establishes procedures to assess a project's non-permanence risk and determine the project's contribution to Verra's buffer pool reserve for geological carbon storage. The assessment includes an analysis of risks related to regulatory framework; governance; land and resource tenure; and closure finance in the jurisdiction in which the storage facility is located, as well as to design features (including injection wells, reservoir characteristics, data accessibility) of the envisaged storage sites.

Depending on the risk assessment's outcome, a higher (for high risk score) or lower (for low risk score) share of credits generated by the project under consideration is deposited in Verra's Geological Carbon Storage buffer pool reserve to be available to equalize re-emissions should they occur.

A similar tool is under development under the CCS+ Initiative for mineralization projects.

¹ Available here: [Draft GCS Non-permanence Risk Tool - public comment version \(verra.org\)](https://verra.org/draft-gcs-non-permanence-risk-tool-public-comment-version)

Background: The CCS+ Initiative² is a global, multi-stakeholder platform, developing a robust, comprehensive carbon accounting methodology framework for carbon capture, utilisation and storage, as well as engineered carbon dioxide removal technologies. These technologies are expected to play a critical role in decarbonizing hard-to-abate sectors and in balancing residual emissions to reach net-zero, but to date cannot secure revenue streams via carbon markets as they lack methodologies to account for their CO₂ reductions or removals.

The CCS+ initiative takes a modular approach covering capture, transport and storage processes, enabling a 'plug-and-play' toolkit for project developers. It leverages voluntary carbon markets to incentivize the scale up of CCS, CCU and technical CDR solutions and accelerate their adoption in compliance markets.

The **robust carbon accounting methodologies are developed** as a **public good** under Verra's Verified Carbon Standard (VCS), in collaboration with leading industry players and technology providers. The work is scrutinized by an Advisory Group, and it aims for the highest standards of environmental integrity.

² More information available at [Carbon Capture & Storage Methodologies with the CCS+ Initiative \(ccsplus.org\)](https://ccsplus.org)