



June 19, 2023

Supervisory Body

United Nations Framework Convention on Climate Change (UNFCCC)

By Email: Supervisory-Body@unfccc.int

RE: Structured Public Consultation – Removal Activities

Dear Supervisory Body:

Thank you for your continuing efforts to ensure that the UNFCCC considers carbon dioxide removal (CDR) as an essential component for a just energy transition to limit warming to 1.5 °C.

Noya PBC is a leading carbon removal company developing a scalable Direct Air Capture approach using abundant, low-cost materials. CEO Josh Santos and CTO Daniel Cavero founded Noya in San Francisco, CA in 2020 with a goal to ensure a healthy planet for generations to come.

Noya has matured its Direct Air Capture technology from lab-scale to small prototypes and will be deploying a first commercial pilot later this year. Noya partners with CO₂ injection well operators to sequester the captured CO₂, ensuring it stays out of the atmosphere for 1,000 years or longer. Noya's carbon removal approach uses minimal land per tonne of CO₂ permanently removed from the atmosphere and will generate new jobs at the construction and operations phases of project deployment. Critically, Noya's closed-system approach to carbon removal allows it to implement rigorous Monitoring, Reporting, and Verification (MRV) at each step in the process.

Noya is grateful for the opportunity to provide additional comment to the Supervisory Body below, in the form of this Structured Public Consultation on Information Note [A6.4-SB005-A02](#), "Guidance and Questions for Further Work on Removals."

We would be pleased to discuss these comments further with the Supervisory Body, and we very much appreciate your consideration, as well as your continuing work to achieve a safe and equitable climate future.

Sincerely,

Josh Santos
Co-Founder & CEO
Noya PBC

Cross-cutting questions:

1. *Discuss the role of removals activities and this guidance in supporting the aim of balancing emissions with removals through mid-century.*

We encourage the Supervisory Body (SB) to follow the lead of the thousands of scientists and other experts who contributed to the IPCC AR6 report and concluded that CDR – alongside a strong global prioritization on reducing emissions of CO₂ and other greenhouse gasses – is “unavoidable” and in fact will be required at gigatonne (Gt) scale by mid-century for us to reach net zero and have a chance to limit warming to 1.5 or even 2°C.¹ We recommend that you accept this conclusion as a foundation of the Article 6.4 deliberations, and not to relitigate the need for CDR.

2. *What are the roles and functions of the following entities in implementing the operations referred to in this guidance: Activity proponent(s), Article 6.4 mechanism Supervisory Body (6.4SB), 6.4 mechanism registry administrator, Host Party, stakeholders?*

We very much appreciate and respect the efforts and leadership of the SB to engage an inclusive process with respect to Article 6.4 deliberations. As a member of the Carbon Business Council, we are key stakeholders in the outcome of these deliberations. We look forward to continuing to engage with the process, and we offer ourselves as a resource to the SB with a common goal of an Article 6.4 mechanism that responsibly and equitably delivers maximal climate benefit in the coming decades. To that end, organizing regular meetings with stakeholders and inviting them to the SB meetings as active observers could be worth considering.

Questions on specific elements

A. *Definitions: Discuss the role and potential elements of definitions for this guidance, including “Removals”.*

We strongly encourage the SB to follow the IPCC’s lead in defining carbon removal as “anthropogenic activities removing carbon dioxide (CO₂) from the atmosphere and durably storing it in geological, terrestrial, or ocean reservoirs, or in products.”² This definition is the consensus product of lengthy deliberation by thousands of scientists and other relevant experts, and should be used by the SB as a foundation of the future Article 6.4 mechanism.

We would like to reiterate that CDR encompasses a range of pathways, from land-based soil and forest carbon sinks; to 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 methods. Effectively all of these pathways

¹ [IPCC AR6 Synthesis Report](#) p 50

² [IPCC AR6 WGIII Report](#) p1,796



and approaches are hybrids with varying degrees of nature and engineering, and we strongly encourage the SB to move away from labels such as “engineering based activities” and adopt a definition of CDR that is method-neutral and criteria based.

In a recently published [Issue Brief](#), the Carbon Business Council draws upon IPCC recommendations and views from experts across the CDR sector to outline five key criteria for high-quality CDR: additionality, durability, net-negativity, verification, and equity and community engagement.³ (Note: Additionality can be challenging to assess with soil carbon sequestration and other regenerative agriculture practices that can nevertheless have meaningful climate value and offer important ecosystem co-benefits. Also, different CDR pathways offer varying levels of durability, all of which have the potential to contribute to meeting our climate goals.) We encourage the SB to adopt a similarly method-neutral, criteria-based approach to determine CDR projects’ eligibility under the Article 6.4 mechanism.

B. Monitoring and Reporting:

2. Discuss any further considerations to be given to the core elements for monitoring and reporting in A6.4-SB003-A03; where possible, identifying the applicable scope, i.e., relevance to all 6.4 mechanism activities, to removals activities, or to specific removal activity categories or types.

High quality monitoring, reporting, and verification (MRV) is the key deliverable for any carbon removal project and essential for building trust in carbon markets. The Carbon Business Council recently published an [Issue Brief](#) outlining the key criteria for high-quality MRV, and we would be pleased to engage with the SB on this important topic.⁴

MRV for CDR is very much a work in progress throughout the sector. These Article 6.4 deliberations offer an opportunity to enshrine high-quality MRV as foundational to global carbon removal markets, and we encourage the SB to take steps to engage with the [EU Carbon Removal Certification Framework](#) process, the work of the U.S. Department of Energy [Office of Fossil Energy and Carbon Management](#), Japan’s [Joint Crediting Mechanism](#), and other key global public sector efforts (multilateral and bilateral) to create and advance a cohesive MRV framework across carbon markets – and avoid a fragmented, patchwork outcome that will be difficult for all stakeholders to navigate.

G. Avoidance of other negative environmental, social impacts. Discuss considerations to be given to core elements for avoidance of other negative environmental, social impacts; where possible, identifying the applicable scope, i.e., relevance to all 6.4 mechanism activities, to removals activities, or to specific removal activity categories or types.

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

⁴ [“Monitoring, Reporting, and Verification,”](#) Carbon Business Council, May 2023.



Responsible and equitable deployment of CDR can help to achieve our climate goals while also delivering co-benefits to ecosystems and communities. As noted in the Carbon Business Council's [May 24, 2023 letter](#) to the SB, we strongly dispute the notion that CDR is incompatible with sustainable development, and not to be deployed in developing countries. On the contrary, responsibly deployed CDR can serve as an engine for sustainable and equitable development worldwide, and we would be pleased to connect the SB with CDR companies and projects already hard at work in the Global South, including in least developed countries and small island developing states. A method-neutral, criteria-based Article 6.4 mechanism should include strong guardrails for equity, ecosystem safety, and environmental justice, but should not preclude individual carbon removal pathways or deployment in specific geographies.