

June 16, 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 continued efforts to ensure that the UNFCCC appropriately considers carbon dioxide removal (CDR) as an essential component for a just energy transition and to limit warming to 1.5 °C. The [OpenAir Collective](#) is an all-volunteer organization dedicated to advancing the responsible and equitable deployment of CDR. We are grateful for the opportunity to provide input 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 greatly appreciate your consideration, as well as your vital work to achieve a safe and equitable climate future for us all.

Sincerely,



Chris Neidl
Co-Founder



Toby Bryce
Policy and Market Development

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.*

OpenAir urges 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.

¹ [IPCC AR6 Synthesis Report](#) p 50

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. OpenAir and our all-volunteer global network of CDR advocates 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.

Questions on specific elements

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

OpenAir urges 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 for the Article 6.4 mechanism and framework.

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 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](#), our colleagues at the Carbon Business Council draw upon IPCC recommendations, and input 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: 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 avoid labeling and selecting particular CDR pathways to incorporate, and instead to adopt a method-neutral, criteria-based approach to determine CDR projects' eligibility under the Article 6.4 mechanism.

² [IPCC AR6 WGIII Report](#) p1,796

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

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. MRV is very much a work in progress across the CDR sector, and these Article 6.4 deliberations offer an opportunity to enshrine high-quality MRV as foundational to global carbon removal markets. 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.

We further encourage the SB to take steps to set a clear precedent for how MRV is incorporated into carbon markets. Specifically, OpenAir recommends that: 1) all CDR projects must be verified by reputable independent third parties, with an openness to new entities and standards bodies that emerge as the sector develops; 2) the cost of MRV for any transaction be listed separately from the aggregate purchase price for credits; and 3) that MRV be contracted and paid for by the buyer (or receiving party) of the credits. These recommendations are intended to streamline and systematize what is currently an opaque and muddled process, and critically, to align all parties' incentives towards the highest possible quality standard.

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.

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 our [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 a strong and resilient 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 absolutely include strong guardrails for equity, ecosystem safety, and environmental justice, but should not preclude individual carbon removal pathways, or deployment in specific geographies.