



Dear Supervisory Board:

Planboo is grateful for the opportunity to provide feedback on the Article 6.4 Supervisory Body's [Information note on Removal activities under the Article 6.4 mechanism Version 04.0.](#)

Planboo is a biochar carbon removal company. We provide the tools, training and technology to enable landowners throughout the Global South to durably remove millions of tonnes of CO<sub>2</sub> in agricultural soils. We have developed a digital Monitoring, Reporting & Verification system which provides evidence that quality carbon removal is taking place through the generation of accredited carbon removal credits. This supports the creation of trust in carbon markets as well as helps to develop a solution to climate change, which is ready to scale today: biochar.

Planboo is an early-stage Swedish company founded in Stockholm in 2020. We operate throughout the Tropics, supporting the scale of biochar carbon removal in the Global South. Our technology enables and tracks biochar projects in these regions. By combining ancient agricultural techniques with our modern day technology, we scale impactful carbon removal and direct carbon finance to where it is needed most. We provide the measuring, reporting and verification digital tools to enable landowners in tropical regions to produce accredited biochar carbon removal credits. These are sold to companies who need to reach Net Zero, providing them with the much needed trust that the carbon removal they are purchasing is actually taking place. MRV is the cornerstone of any quality carbon credit project and digital, transparent MRV is essential to bring trust back to carbon markets.. Planboo's solution goes far beyond carbon removal. Biochar is a sustainable solution that replaces conventional methods of waste management and soil improvement. It is a carbon-rich material produced through the process of pyrolysis, converting organic waste into a stable form of carbon. By using biochar as a soil amendment, it enhances soil fertility, water retention, and nutrient availability, thereby reducing the need for synthetic fertilisers and improving crop yields. Biochar sequesters carbon in the soil for 100-1,000 years. By 2030, our biochar projects have the potential to remove over 8,100,000 tCO<sub>2</sub>, contributing to climate change mitigation efforts. Additionally, our solution supports the creation of green jobs and boosts local economies where the projects are taking place. Our projects are signed so that the production and utilisation of biochar create employment opportunities, particularly in rural areas in tropical regions where biomass resources are abundant (e.g agricultural waste). This can help stimulate local economies and reduce unemployment rates.

**We disagree with several characterisations of CDR made in the Supervisory Body's info note:**

- The Info note's conclusions are inconsistent with current IPCC accounting guidance and acknowledgement of the need for gigatonne scale CDR in coming decades. It misrepresents

the benefits of long-term storage and its foreseen role according to scientific assessments, e.g. via the inclusion of tonne-year crediting.

- The Info Note's framing of CDR as either "engineering-based activities" or "land-based activities" is arbitrary and not science-based. Biochar is one example of a CDR solution that combines natural and 'engineered' elements, as well as serves to enhance and enrich soils.
- The Info note's argument that 'engineered' CDR solutions are inconsistent with sustainable development goals for the Global South is arbitrary and does not reflect emerging economic and environmental opportunities presented by emerging and already commercial CDR pathways and solutions.

We are committed to advancing the scaling of carbon removal throughout regions of the world that are both worst impacted by climate change and also have the biggest potential to contribute to the solution. We hope the Supervisory Body shares the same vision as it moves forward with its work.

Sincerely,

Priya Bhullar Cofounder & COO

Planboo Eco AB

A handwritten signature in black ink, appearing to read 'Priya Bhullar', with a horizontal line underneath the name.