

Email: Supervisory-Body@unfccc.int

Subject line: Structured Public Consultation – Removal Activities

We would like to thank the Supervisory Body for taking the time to build up a balanced evidence base to understand the climate benefits, co-benefits and liabilities of a broad range of carbon removal approaches. Your efforts to create an Information Note that will serve as a strong foundation for guidance on carbon removals is of crucial importance: the rules around Article 6.4 will set the floor for activities under Article 6.2 and shape how the voluntary carbon market and policy-makers define carbon removals

Separately from this submission, our organisation - Rethinking Removals - has coordinated with organisations across the global carbon removals ecosystem to provide the Supervisory Body with detailed line-by-line information and evidence on their specific technologies and approaches to monitoring, reporting and addressing risks. You will have received these individually from the various organisations and groups.

In this submission, we would like to touch on a few common, overarching and very important issues, which we have discussed at length with the above organisations, with policy makers, voluntary rule-setters and climate NGOs, and with members of the Rethinking Removals Doers Club, a group of over 20 organisations, working to implement or enable first-of-a-kind, commercial-scale carbon removal projects in countries from Kenya to the US and Sweden. The conclusions here are a summary of these multiple conversations, dialogues and engagements. We hope they are helpful as you make your deliberations.

#### 1) **Carbon reductions and removals need to go hand in hand – and they can!**

There is a very real – and very reasonable – fear that leaning on carbon removals for any part of our climate plans risks letting people off the hook and reducing our essential focus on reductions. The IPCC tells us that we need to reduce emissions much faster than we are currently doing, and there is plenty of fear about anything that might take away from that.

However, it's now too late to look at this as an either/or option. The IPCC also tells us that we need to build the capacity to remove emissions much faster than we are doing at the moment, and there is rising fear that we are not doing this quickly enough and will not have nearly enough capacity when we need it.

What we need is to put the two together, accelerating both reductions and removals at pace, so they are not fighting each other but work together to achieve our climate goals. There are several ways to do this, and the most promising is a push to create separate targets so that countries, organisations and individuals can be judged against their progress on *both* reductions *and* removals. What's clear is that we no longer have the choice of one or the other. We have to develop both, in parallel, as fast as we can. As Kumi Naidoo, former executive director of Greenpeace, recently put it: “*We don't have time to choose between stopping emissions and removing CO2 from the air. We need to do both to survive.*”

## 2) **Carbon removals are a significant economic opportunity for the Global South.**

The amount of carbon removals now needed is daunting, especially as we are starting from such a low level. The [IPCC](#) estimates we must remove up to 100 million tonnes CO<sub>2</sub>e per year by 2030 – and between 5 and 16 billion tonnes of CO<sub>2</sub>e per year by 2050, to have a chance at meeting global climate targets.

To have any chance of achieving that, all carbon removal approaches need to be scaled up urgently and rapidly – and this particularly applies to the more novel, nascent and expensive approaches, in order to get them quickly down the cost curve.

The best places to do this are arguably those with low emissions that don't have a trade-off between reductions and removals and can focus their renewable energy resources on developing high-durability, high-cost removals quickly and cheaply. In other words, many countries in the Global South. This has important potential advantages when it comes to sustainable development, because energy-hungry carbon removals plants have the potential not only to kick-start green industrial economic development in the Global South but also to unlock investment in renewable energy at scale.

To date developing untapped renewable resources is difficult precisely because many countries, especially in Africa, do not have large industrial off-takers to act as anchor tenants. Developing carbon removals approaches with high renewable energy needs, paid for by the Global North, can break this cycle by providing the demand that can and make it economically feasible to develop renewable energy at scale. This has high potential to open up much greater access to renewable electricity in many countries in the Global South.

That's one big reason that the Article 6.4 framework is especially important for countries in the Global South – some of which have already decided that the economic opportunity of developing carbon removals will be an important part of their sustainable development pathways. For example, the Kenyan government recently hosted a [national workshop](#) focused on establishing a hub for direct air capture in central Kenya.

Moreover, there are other ways in which sustainable development and carbon dioxide removal – in its many forms – can intersect and reinforce each other powerfully. In addition to the climate impact, several African governments aim to use carbon removals to tap additional revenue streams, create jobs, support small-holder farmers, open access to renewable energy, build out infrastructure and improve waste management in mining and agriculture. The framework set by Article 6.4 will play a key role in enabling or blocking these projects.

## 3) **Carbon removals go beyond 'nature vs engineered' to span a very wide spectrum of approaches that involve the application of both natural resources and human ingenuity.**

Though it is hugely tempting to put carbon removals into two neat, tidy categories – 'nature-based' and 'engineered' – this no longer represents anything close to the full

range of carbon removal approaches. Already we have biochar, bioenergy with carbon capture and storage and enhanced rock weathering , all of which combine nature-based benefits with enhanced CO2 storage through engineering processes. And this is a fast-moving industry, with many new technologies and approaches in development.

A year ago, no one was thinking about the potential of enhanced rock weathering in Africa to mitigate soil nutrient depletion, support small-holder farmers and recycle mine waste; 18 months ago, no-one had imagined that direct air capture and storage solutions developed in Iceland could make sense in Kenya, creating anchor demand to drive development of grid infrastructure and much wider access to energy. As the science and technology develop, the same evolution could be true for ocean alkalinity enhancement projects, new approaches to increasing the durability of soil carbon removal or new hybrid approaches that seek to combine the strengths of different kinds of carbon removals.

For these opportunities to be realised, we need dynamic ways to categorise carbon removals, focusing attention on specific approaches (or ranges of approaches) in specific places and models. Sticking to the outdated categorical binary of 'engineered' and 'nature-based' would render many of the above developments impossible to realise. As the sector continues to expand and diversify, virtually every carbon removal approach is now a hybrid of nature and engineering.

#### **4) Rules and frameworks need to be applicable across the entire spectrum of solutions.**

We welcome the Supervisory Body's renewed focus on the specific mandate set by CMA3 to elaborate on rules, modalities and procedures for MRV, addressing reversals, avoidance of leakage and avoidance of other negative environmental and social impacts. If this industry is to provide the scale needed to have its essential climate benefit, while also supporting sustainable development, it needs a neutral and science-based framework that provides rules on permanence, leakage and liabilities. Above all the industry needs rules that determine which projects are credible, effective and sustainable – which is a challenging task in its own right. As we hope the above comments demonstrate, we believe this will be vastly more effective than defining which specific removal approaches are in scope and which not.

Again, thank you for all your hard work in this space. We know that the task of creating robust rules for Article 6 and the rest of the Paris agreement is challenging and often thankless. Your efforts and careful attention are very much appreciated.

#### **Rethinking Removals Doers Club**

*Members of the Doers Club and participants in discussions on this response include: 1PointFive, American Carbon Registry, C-Capsule, Carbon Engineering, Carbonfuture, Carbonplace, Cella, Charm Industrial, Climate Action Platform - Africa, CO2.com, CUR8, Drax, JPMorganChase, Kita, NextGen Facility, Northern Lights, Planetary, Puro, Rubicon, Salesforce, Shopify, South Pole, Sylvera, Standard Chartered, Stockholm Exergi and UNDO Carbon.*