



February 28, 2023

Supervisory Body (SB004)

United Nations Framework Convention on Climate Change

Bonn, Germany

RE: The 4th Meeting of the Article 6.4 Supervisory Body - Public Comment Period

Dear Supervisory Body of the UNFCCC:

Thank you for working to ensure that the UNFCCC considers carbon removal as an important component for a just transition to limit warming to 1.5 °C. The [Carbon Business Council](#), a nonprofit trade association of more than 80 innovative carbon management companies with more than \$1.5 billion in combined assets working across six continents, appreciates your invitation to respond to the public comment period that you have issued for the agenda and additional meeting documents.

Drawing upon [our letter](#) provided during the 2022 call for input by the Supervisory Body on Activities Involving Removals Under the Article 6.4 Mechanism of the Paris Agreement, we would like to reaffirm the below considerations in regards to A6.4-SB003-A03 and A6.4-SB004-AA-A04 as proposed for the upcoming fourth meeting of the Article 6.4 Supervisory Body:

1. Carbon removal companies are looking toward marketplaces to buy and sell carbon removal credits, which can expedite the industry's growth and help fulfill net-zero targets as well as help countries achieve their own NDC commitments to meet the goals of the Paris Agreement. A new generation of companies is creating an array of promising carbon removal solutions that even surpass those currently listed in Annex 6; encompassing and tech-neutral definitions for compliance and voluntary carbon markets will help to ensure that as wide a range of solutions as possible can be scaled up.
2. We encourage that the UNFCCC consider an expansion of carbon removal approaches as discussions continue around Article 6, especially in light of the recent IPCC report's incorporation of removals into climate abatement scenarios. We encourage the UNFCCC to help foster climate restoration by accounting for the unique approaches, challenges, and opportunities of CDR both between and across governments. The time is now to send a clear signal that over time, removals will be required.
3. We applaud the UNFCCC for continuing to include the importance of Measurement, Reporting, and Verification (MRV) in contents on removals. As some approaches require special considerations in MRV, the requirements should be flexible enough to encourage all legitimate technologies.
4. As voluntary carbon markets (VCMs) and carbon removal companies scale, as well as the usage of CDR within and across government operations, it is vital to address and crystallize the differences between avoidance and removal and overcome barriers to entry for CDR



developers in markets, especially as governments may themselves partner with such initiatives to account for their own national emissions.

We invite the UNFCCC to review the Carbon Business Council's policy and market recommendations summarized in this letter and our [white paper](#) on removals credits and voluntary carbon markets. Carbon markets have a significant opportunity to continue to evolve in a manner that helps bring durable and promising carbon removal solutions to market in addition to offsets-based markets. Based on the challenges and constraints in today's markets, the recommendations above can help strengthen considerations around carbon markets as addressed in the Article 6.4 mechanism of the Paris Agreement.

We appreciate the continued endeavors taken by the UNFCCC to achieve a more equitable climate future and thank the Supervisory Body for the invitation to submit our comment. Please do not hesitate to reach out if you have any inquiries.

Sincerely,

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