From: Roberts, Jack <Jack.Roberts@wsp.com>
Sent: Monday, 22 May, 2023 18:55
To: Supervisory-Body <Supervisory-Body@unfccc.int>
Subject: Input to SB005 annotated agenda and related annexes

Greetings,
As a professional with a graduate degree in sustainable business, and a member of the Air Miners Community, I'd like to call attention to the Pros and Cons listed under Table 3 concerning engineering-based carbon removal activities of section 3.2 under Article 6.4.

There are various sub sectors of engineered carbon removal solutions and deeming them all empirically "technologically and economically unproven" is a dangerous and untrue generalization. Examples like Climeworks Orca and Mammoth plants, recent scaled investment in Charm Industrials's bio-oil solution, and CarbonCapture's Project Bison prove there is funding available to scale permanent, proven engineered CDR solutions. And many more are on the way.

Additionally, BECCS, CCUS and utilization (like concrete production) are proven, economic and provide massive climate impact, yet they still need additional policy support, which can be provided by article 6.4.

Table 3 also notes, "these activities do not contribute to sustainable development" and "do not serve any of the objectives of the Article 6.4 mechanism".

The objective of Article 6.4 of the Paris Agreement mechanism states, "to promote the mitigation of greenhouse gas emissions while fostering sustainable development;".

To start, engineered carbon removal methods qualify as climate mitigation. If CDR projects are developed equitably, they provide massive upside for developing countries to play a role in the future of a sustainable economy. Projects like DAC hubs can mitigate load issues associated with large scale renewable projects in developing countries where energy demand is low.

The market for high quality carbon removal credits will scale rapidly through the coming decades, and ensuring developing countries have access to equitable development opportunities is absolutely crucial.

I thank you for all of the work invested in Article 6.4, and call on you to adjust the empirical classification of engineered carbon removals, and utilize the mechanism under Article 6.4 as a launch pad to scale engineered carbon removal, because it is necessary to meet our global climate targets.

Thank you,

Jack Roberts
Associate Consultant
Sustainability, Energy and Climate Change
he/him/his

M +1 206-965-0424
E jack.roberts@wsp.com

WSP USA
1001 Fourth Ave., Suite 3100
Seattle, WA 98154

wsp.com/advancingsustainability