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Sent: Tuesday, 23 May, 2023 18:36

To: Supervisory-Body <Supervisory-Body@unfccc.int>

Cc: Silko Barth <silko@blueskiesminerals.com>; tbryce@gmail.com; Jason Grillo <jason@airminers.org>

Subject: IPCC restriction of CDR definition

To the Supervisory Body:

Thank you for your invitation to respond to the recently issued Information Note entitled "Removal activities under the Article 6.4 mechanism" (A6.4-SB005-AA-A09 version 0.40).

My colleague Silko Barth and I are developing the Carbonated Tailings Process, a process that will mineralize captured atmospheric carbon in mining waste. Our process will eliminate contaminant leaching, as well as the need for tailings storage facilities that are susceptible to catastrophic failure. We are currently partnering with two mining companies to develop this process: Agnico Eagle and Boliden AB. We are actively engaged in discussions with Rio Tinto, Teck Resources, ArcelorMittal and Anglo American for additional partnership. This list of interested mining companies underscores the general interest in solutions to decarbonize mining operations. However, **we are only one of several companies offering a broad range of solutions to decarbonize this industry**. Your definition of CDR in the above Information Note does not reflect this breath of solutions.

Rio Tinto has taken a lead role within the industry in committing to achieve Net Zero. They have made significant investments in developing less carbon intensive process changes, substituting fossil fuel energy for renewables and divesting themselves of coal assets. Nonetheless, they expect that their best efforts will only result in 88-92% emission reductions. The rest will need to be offset through CDR.

In [their 2022 report](#) describing their approach to climate change, they present the following position regarding carbon offsets:

Given the high cost of emissions reductions and lack of commercially viable low-carbon alternative technology for parts of our business, our long-term commitment is for our operations to be net zero emissions by 2050, rather than zero emissions. While we are prioritising emissions reductions at mines and smelters, we are also exploring the potential role of Nature-Based Solutions (NBS) and carbon capture and mineralisation. Carbon offsets and removals are expected to form a limited part of our decarbonisation strategy – as they are at the bottom of the mitigation hierarchy – and we are developing our internal capability to create a portfolio of offset projects. In 2021 we conducted a Group-wide assessment of the biodiversity and carbon potential of our landholding. We have identified several opportunities to develop carbon offsets at and near our sites such as in Madagascar, near QMM operations. These projects could also bring community and biodiversity benefits and we will continue to assess the opportunity in 2022.

We are starting to explore carbon capture and mineralisation options leveraging our exploration and geological expertise. Carbon mineralisation is now being used at large scale in Iceland and promises to be a key technology in meeting global climate goals. We partnered with Carbfix to capture carbon and permanently store it underground at our ISAL aluminium smelter in Iceland.

We have also launched a partnership with climate technology and research bodies to develop the ability to store carbon as rock at the Tamarack nickel project in Minnesota. The geology of the

Tamarack site holds the potential to permanently store large amounts of carbon captured from the atmosphere or from hard-to-abate industries by mineralising it through natural chemical reactions.

Our discussions with Rio indicate that they are examining a broad array of solutions, rather than the narrow list provided in the Information Note. Taking such a narrow view will hurt this industry, and more broadly hamper our ability to find solutions to the climate crisis. It is inconsistent with the need to make every possible effort to make the world liveable for our children. We urge you to broaden your definition of acceptable methodologies for CDR and recommend that you adopt the [definition](#) recently presented by the Carbon Business Council.

Respectfully,



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CEO

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