

--The enclosed letter has been signed by more than 100 carbon removal experts--

May 24, 2023

Supervisory Body

United Nations Framework Convention on Climate Change (UNFCCC)

RE: Input to SB005 Annotated Agenda and Related Annexes

Dear Supervisory Body:

Thank you for your continuing efforts to ensure that the UNFCCC considers carbon dioxide removal (CDR) as an essential component for a just energy transition and to limit warming to 1.5 °C. The 100+ organizations below appreciate your invitation to respond to the call for input that you issued. Specifically, we would like to share some thoughts here in response to the Information Note entitled “Removal activities under the Article 6.4 mechanism” ([A6.4-SB005-AA-A09](#) version 0.40).

We are pleased to see the Supervisory Body Information Note concur with the IPCC that the science is clear that CDR – alongside a strong global prioritization on emissions reduction of CO₂ and other greenhouse gases – is “unavoidable,” and in fact will be required at gigatonne (Gt) scale by mid-century for us to reach net zero and have a chance to limit warming to 1.5 or even 2°C ([IPCC AR6 Synthesis Report](#) p 50). It is important to further highlight that CDR encompasses a range of pathways, from land-based soil and forest carbon sinks; biomass-based carbon removal and storage ([BiCRS](#)); to marine carbon dioxide removal ([mCDR](#)); to [mineralization-based approaches](#); to direct air capture ([DAC](#)) – as well as emergent and potentially as yet undiscovered methods.

CDR is a new commercial sector, and the range of potential pathways are at varying stages of discovery, development, and deployment. The sector is advancing quickly, and there are a number of approaches ready for eligibility under Article 6.4 now, with more expected to reach that stage of maturity in coming years. (We have significant concern with the assertion on p. 18 of the Information Note that CDR does not “contribute to sustainable development,” and we would be pleased to connect you with carbon removal leaders advancing projects in Kenya, Kiribati, India, Brazil, and other locations around the world where CDR is contributing directly to local and regional economic development.)

In a recently published [Issue Brief](#) by the Carbon Business Council, this resource follows the IPCC’s lead to define CDR as “anthropogenic activities removing carbon dioxide (CO₂) from the atmosphere and durably storing it in geological, terrestrial, or ocean reservoirs, or in products” ([IPCC AR6 WGIII Report](#) p1,796). The Brief goes on to outline five key criteria for high-quality CDR: additionality, durability, net-negativity, verification, and equity and community engagement. We strongly urge the Supervisory Body to adopt this IPCC definition of CDR, and a similarly method-neutral, criteria-based approach to determine CDR project’ eligibility under the Article 6.4 mechanism.

The Information Note lists four CDR approaches under the label of “engineering based activities” – a label we do not recommend given that virtually every CDR approach is a hybrid of nature and engineering. We would suggest, instead of labeling and enumerating individual CDR pathways and approaches, that the Supervisory Body define the criteria that a given CDR project must

demonstrate to be eligible under the Article 6.4 mechanism – and let science, innovation, and the market compete to deliver the solutions offering the greatest climate impact and other co-benefits.

We would be pleased to discuss this further with the Supervisory Body, and very much appreciate your continuing work to achieve a safe and equitable climate future, as well as the opportunity to submit this input for your consideration.

Sincerely,

Aditya Agrawal	Chief Innovation Officer	Global Carbon Removal Partnership
Alex Bell	Chief Growth Officer	Removr
Alexander Milde	Engineer	Scaled Carbon
Amy Chambers	Director Marketing Communications & Sustainability	Carbon Streaming Corporation
Andre Sobolewski	CEO	Blue Skies Minerals Inc
Andrew Denu	Commercial Lead Senior Manager, Climate Programs	Andes
Andy Lam		MaRS Discovery District
Angela Hepworth	SVP Commercial BECCS	Drax Group
Anna Lehner	Standards & Methodologies	Carbonfuture
Anna Lerner	CEO	Climate Collective
Antti Vihavainen	CEO	Puro.earth
Apoorv Sinha	CEO	Carbon Upcycling
Aranzazu Carmona Orbezo	Founder / CTO	Parallel Carbon
Ben Rubin	Executive Director	Carbon Business Council
Ben Swainbank	Founder	Oceanid MRV
Ben Tarbell	CEO	Ebb Carbon
Benedikt Zimmermann	Vice-chairman	German Biochar Association

Bradley Rochlin	Director of Strategic Partnerships	Running Tide
Brandon Vlaar	CEO	Mangrove
Brian Krohnke	President	Tiny Carbon LLC
Brian Reynolds	Director	Carbon char store
Bryan Eagle	CEO	Glanris
Calli Obern	Director of Policy	Capture6
Casey Handmer	Founder and CEO	Terraform Industries, Inc.
Chris Neidl	Co-Founder	OpenAir Collective
Chris Sherwood	Secretary General	Negative Emissions Platform
Christiaan Gevers Deynoot	Senior Manager, Carbon Removals Platform	South Pole
Claire Nelson	Co-founder and CTO	Cella
Corey Pattison	Co-Founder and CEO	Cella
Crystal Kuyumcu	CEO	Exhale Aerosystems
Daniel J. Soeder	Owner and Principal	Soeder Geoscience LLC
Delia Meth-Cohn	Co-founder	Rethinking Removals
Diana Maranga	Business Development & Policy Lead	Octavia Carbon
Dr. Matthew Eisaman	Chief Scientist	Ebb Carbon
Elodie Vignon	Senior Climate Policy Manager	neustark
Felix Harteneck	CEO	InPlanet GmbH
Florian Hildebrand	CEO	Greenlyte Carbon Technologies GmbH
Frederic Clerc	Director	Carbon to Value Initiative
Giana Amador	Executive Director	Carbon Removal Alliance

Grant Faber	Founder and President	Carbon-Based Consulting LLC
Hanna Ojanen	Public Policy Lead	Carbo Culture
Hayley Moller	Founding Team + Chief Marketing Officer	Thallo
Helen Bray	Vice President Policy	Puro.earth
Isabella Corpora	Associate Director	Carbon Business Council
Jack Sullivan	Chairman, Founder	RedCarbon
James Rogers	Officer	Direct Air Capture Coalition
Jason Grillo	Director	AirMiners
Jason Hochman	Co-Founder and Senior Director	Direct Air Capture Coalition
Jesse Hebert	Co-Founder & COO	OCHIUS
Jim Mann	CEO	UNDO
Jodi Formosi	CEO/FOUNDER	Bella Biochar Corporation
Johan Börje	BECCS Development	Stockholm Exergi AB
John Hoopes	Co-Founder	Toucan Protocol
John Lin	CEO and Co-Founder	Tau Carbon Inc.
Jordon Sansom	CEO	Minera Systems
Josh Dorfman	CEO	Plantd, Inc.
Julio Friedmann	Chief Scientist	Carbon Direct
Kel Coulson	Policy and Engagement Lead	Carbon Engineering
Kelly Erhart	President	Project Vesta, PBC
Linus Hiscox	Senior Carbon Rating Scientist	BeZero Carbon
Lucy Hargreaves	VP, Corporate Affairs + Climate Policy	Patch
Marcel Rensmann	Head of Technical Sales	PYREG GmbH

Marcus Extavour	Chief Climate Solutions Officer	TIME CO2
Matt Bright	Director of External Affairs	CarbonCapture Inc.
Matthias Krey	Managing Director	Perspectives Climate Group
Maurice Bryson	Founder and director	Silicate
Megan Mayzelle	Executive Founder	Written Progress
Melody Ma	Global Head of Policy & Regulatory Affairs	ACX
Michael Avery	President	1PointFive
Michael Baute	Entrepreneur in Residence, Director Carbon Removal	AES
Michael Kelland	CEO	Planetary Technologies
Mike Carpenter	CEO	Inherit Carbon Solutions
Mike Green	Partner	Carbon Capital Advisors
Mira Nagarajan	Market Development and Policy Lead	Origen Carbon Solutions
Natalia Dorfman	CEO and Co-Founder	Kita
Nicholas Gogerty	Managing director	Carbon Finance Lab
Nicholas Rockwell	VP of Revenue	Alcove
Niklas Kluger	COO and Co-Founder	InPlanet
Oliver Katz	Founder and CEO	Unbound Summits
Olivier Dufresne	CEO	Exterra Carbon Solutions
Ongeleigh Underwood	Director	Circular Carbon Network
Pascal Michel	Founder & CEO	Everest Carbon Inc.
Patricia Estridge	CEO	Seaweed Generation Ltd
Patrick Dwyer	Partner	Carbonseek Partnerships
Paul Gambill	CEO	Nori

Paul Stevers	CEO	Integrated ClimateTech, Inc. (iClimateTech)
Peter Chargin	Vice President, Government and Community Relations	Planetary Technologies
Qinhong Cai	CEO	Gaia Refinery
Ryan Anderson	CEO	Parallel Carbon
Ryan Jeffery	Senior Managing Director, Sustainability	gener8tor
Savita Bowman	Program Manager, Carbon Management	ClearPath
Sean Lowrie	Head of External Affairs	Arca
Sebastian Manhart	Senior Policy Advisor	Carbonfuture
Shantanu Agarwal	Director	Swaniti Initiative
Silko Barth	CTO	Blue Skies Minerals
Simon Manley	Head of Carbon	UNDO Carbon Ltd
Simon Nicholson	Co-Director	Institute for Carbon Removal Law and Policy
Stephanie Bischof	Managing Director	Airfix
Steve Oldham	CEO	Captura
Susanne Veser	Dr.-Ing.	Fachverband Pflanzenkohle e.V.
Svenja Telle	Director of Origination	Base Carbon
Toby Bryce	Policy Advisor	Carbon Business Council
Tony Pan	CEO	Modern Hydrogen
Torsten Becker	CEO	carbonauten GmbH
Travis Caddy	Product Manager	Evident
Trip Allen	CEO	Levitree
Vida Gabriel	Co-Founder	TerraFixing

Wendy Lu Maxwell-Barton	Executive Director	International Biochar Initiative
Wil Burns	Co-Director	Institute for Carbon Removal Law & Policy, American University
Wilfried Maas	Chief Carbon Technology	Carbon Direct
William Pazos	Co-CEO	ACX (Aircarbon Exchange)