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From:

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To:

Article 6.4 Supervisory Body

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Input to A6.4-SB005-AA-A09 annotated agenda and related annexes

Dear Article 6.4 Supervisory Body,

Thank you for your ongoing work developing recommendations on carbon removals and methodologies under Article 6.4.

CarbonCapture Inc. is a company that develops and deploys direct air capture (DAC) machines that remove CO_2 from the atmosphere.[1] In September, 2022, we publicly announced Project Bison,[2] a 5-megaton direct air capture facility in Wyoming, USA, that we expect will be the largest single DAC project in the world by 2030. We are already selling substantial numbers of DAC-based carbon removal credits from Project Bison.[3] Moreover, we are actively engaging with the local community, having performed multiple town halls in October 2022.[4] Consequently, the "cons" laid out in Table 3 (pros and cons of the different activity types being made eligible under the mechanism) belie the reality of the "engineering-based removal activities" in which we are currently engaged.

Specifically, we take exception to the statement that DAC technology is "economically unproven" and that it does "not contribute to sustainable development." Neither statement is correct. In addition to the credits that we have already sold for Project Bison, several other DAC companies have made multi-million-dollar sales. In the last year alone, we have seen record-breaking public and private capital investments; procurement-based and compliance-based statutory proposals taking shape in legislative bodies around the world; and the announcement of new carbon removal projects globally. Furthermore, just this week JP Morgan Chase signed a $20 million deal with Climeworks[5] to buy DAC-based carbon removals, with major additional purchases expected to be

[1] https://www.carboncapture.com/
[2] https://www.carboncapture.com/project-bison
[3] https://www.theverge.com/2023/3/22/23651587/microsoft-climate-tech-startup-carboncapture-wyoming
[4] https://www.carboncapture.com/project-bison-wy
[5] https://www.cnbc.com/2023/05/23/jpmorgan-agrees-to-purchase-200-million-worth-of-carbon-removal.html

announced over the next month. In total, 75% of the $200 million or 510,000 tonnes of purchased carbon removal in 2020-2022 were from DAC projects.[6]

This is exactly the type of catalytic momentum that we expect will help drive costs down below $100/tonne, thereby meeting the objectives of the U.S. Department of Energy's (DOE) Carbon Negative Shot.[7] Note that our techno-economic analysis shows our costs and energy usage per ton coming down by 70% to 75% over the next decade as we scale up deployments and continue to advance through our technology roadmap.

The scaleup of DAC is anticipated to create at least 300,000 high-paying jobs that will support whole communities.[8] Our company alone plans to create over a thousand direct jobs in DAC over the next decade. This is a major component of the "sustainable development" that the DOE envisions in its $3.5 billion (U.S.) Regional DAC Hubs Program,[9] which requires companies like ours to commit to extensive community engagement activities, including working toward the goal that at least 40% of the benefits from a DAC Hub grant flows to disadvantaged communities. We believe this perfectly meets the definition of "sustainable development." Note that our commitment to Wyoming (and any other community where we deploy DAC facilities) is based on the three pillars: transparency, dependability, and preservation. Internally, our team is working to reduce unit water and energy requirements over time to help minimize impact. Externally, we are working closely with local stakeholders to ensure the resources we do require, such as water, are sourced in ways that will not impact local populations or wildlife (e.g., high-salinity water vs water for agricultural use). Similarly, our plans for the state of Wyoming fit perfectly within the U.N.'s Sustainable Development Goals framework. Specifically, our Project Bison is contributing directly to SDG 7 (Affordable Clean Energy), SDG 8 (Decent Work and Economic Growth), and SDG 9 (Industry, Innovation and Infrastructure).

In summary, though DAC is a nascent technology, there is ample evidence to suggest that it and other "engineering-based removal activities" are becoming sought-after, gold-standard credits within the carbon dioxide removal industry. It is unequivocal that DAC carbon removal credits are rapidly increasing their market share and will continue to do so as costs come down each year. Further, DAC facilities can be sited in multiple locations across the globe, ensuring that the economic benefits of carbon removal are widely distributed and achieve sustainable development goals.

Therefore, we urge the Supervisory Body to revise the Table 3 by striking the aforementioned cons and asserting that the following pros of engineering-based removal activities:

- Engineering-based removal activities generate significant economic activity that create equitable local employment and livelihoods.

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6 https://static1.squarespace.com/static/633458017a1ae214f3772c76/t/63e3d4602156db24bc18c91c/1675875445298/SoCDR-1st-edition.pdf (p. 36)

7 https://www.energy.gov/fecm/carbon-negative-shot

8 https://rhg.com/research/capturing-new-jobs-and-new-business/

9 https://www.energy.gov/oced/regional-direct-air-capture-hubs

- Engineering-based removal activities generate significant sustainable development co-benefits.

If we can be of any further assistance supplying information about DAC or our company's activities, please reach out.

Sincerely,

Adrian Corless

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CarbonCapture Inc.