CRIA
CARBON REMOVAL
INDIA ALLIANCE

24th May 2023

Input to SB005 2023 Annotated Agenda and Related Annexes

Supervisory Body, United Nations Framework Convention on Climate Change (UNFCCC)

Introduction to the Carbon Removal India Alliance (CRIA)

We are a consortium of organisations and individuals developing carbon removal technology, conducting research into carbon removals, and engaging with policy to foster an enabling environment for activities that directly remove carbon from the atmosphere in India.

Over the longer term our mission is to support the development of a carbon removal sector in India to generate income, investment and jobs while reducing air pollution and greenhouse gases in the atmosphere.

CRIA's membership includes the key organisations working in carbon removals technologies and projects in India as well as global leaders in carbon removals technologies and carbon credit registry management.

Our Response to the Request for Comment

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. Following your invitation to respond to the call for input that you issued. We wanted to respond 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.

Sustainable Development from CDR is Proven with Large Opportunity to Scale Positive Impact for the Traditionally Hard to Reach Rural Poor

In the Indian context, CDR activities and credits represent a method for financial redistribution from countries, organisations and individuals in developed countries to some of the world's poorest. The distribution of carbon credits from artisanal and larger scale biochar to, traditionally hard to reach, small scale farmers across India being an ongoing example. As a result of this experience on the ground, we have significant concerns with the assertion on p.18 of the Information Note that CDR does not "contribute to sustainable development." In addition to the carbon market from CDR being a mechanism for direct cash transfer to hard-to-reach global poor, the use of Biochar improves soil quality and raises yields to improve livelihoods amongst the world's poorest. To this end we would be pleased to connect you to our members who have used CDR to improve the lives of the rural poor in India and contributed to local and regional economic development.

The Need to Move Away from 'Engineering Based Activities' as the Label for CDR

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. In the Indian context the focus on biochar and enhanced rock weathering for carbon removals is the enhancement of natural processes, using engineering in tune with nature. Therefore, the label of 'engineering-based activities' is not accurate. We would suggest, instead of labelling 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,

CRIA (The Carbon Removal India Alliance)