

RE: Input to SB005 2022 Annotated Agenda and Related Annexes

Dear members of the Supervisory Body,

Thank you for the opportunity to contribute to the critically important conversation regarding the role of carbon removals under Article 6.4 of the Paris Agreement.

Climate Action Platform - Africa (CAP-A) is a not-for-profit focused on realising transformative economic growth in Africa through climate action. We firmly believe in the potential of African countries to become hubs for the supply of cost-effective, high-integrity carbon dioxide removal (CDR) technologies, and a critical player in efforts to limit warming within 1.5 degrees.

We wish to provide our feedback on the Information Note entitled “Removal activities under the Article 6.4 mechanism” ([A6.4-SB005-AA-A09](#) version 0.40). We note that, amongst others, the Open Air Collective, Doers Club, Direct Air Capture Coalition and CDR companies anchored in the Global South (Cella and Octavia Carbon) have provided responses that aptly defend the scientific and economic viability of CDR technologies - and we fully support these submissions.

Accordingly, we focus our response on the particular assertion that engineering-based activities “do not contribute to sustainable development, and are not suitable for implementation in the developing countries” (Table 3.2), and provide the following input:

- 1. Africa is ideally suited to become a destination for CDR technologies** - many African countries have intrinsic potential to be cost-competitive locations for engineered removals, thanks to the massive untapped renewable energy potential (50x the global anticipate electricity demand in 2040), their youthful, rapidly growing workforce, and available land and relevant natural assets. Their low levels of existing emissions means energy-intense climate action (such as most CDR technologies) do not represent a moral hazard - unlike in other geographies, where new renewable energy generation capacity should first be deployed towards decarbonising existing economic industrial activity. For example, Kenya is fast becoming a destination for Direct Air Carbon Capture and Storage due to its abundant renewable (geothermal) energy sources, and its geology that is well-suited to mineralisation. Other engineered removals with high environmental and economic potential on the continent include biochar and enhanced rock weathering.
- 2. Implementation of CDR technology at scale has the potential to help address energy poverty** - Africa lacks sufficient anchor demand to drive investment, as unused surplus capacity is a disincentive to expand generation capacity. As a result, limited access to electricity continues to limit Africa’s potential. Deploying engineered removal (which tends to be energy-intense) in Africa will draw on otherwise underutilized renewable energy potential. Deploying CDR and other energy intensive use cases could create a commercial basis for much-needed global investment in Africa’s energy system with substantial economic co-benefits for African communities.
- 3. CDR can be a catalyst for green industrial development and economic growth in Africa** - Africa’s emissions will rise substantially without a green development path that avoids reliance on fossil fuels. CDR technologies - backed by carbon finance - can be an important part of the first wave of green industrial development in Africa, providing the financial incentives needed to spur investment in green growth. As a very nascent technology industry, engineered CDR does not yet have an ‘anchor location’ - all deployment locations will need to build the right skillset, capacity, and infrastructure. This removes the traditional disadvantage of lack of infrastructure or talent base, that emerging economies face when trying to develop industries that have already anchored on other global locations.

In conclusion, we believe the authors of the Information Note miss a real opportunity for transformative and inclusive economic growth when they dismiss engineered removals as not being suitable for deployment in developing countries. In fact, the engineered removals sector represents a key opportunity for African countries to realise economic growth and job creation, while contributing to the global climate agenda.

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.

Best regards,



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