

From: David Andersson <david.andersson@ecoera.se>
Sent: Monday, 22 May, 2023 15:24
To: Supervisory-Body <Supervisory-Body@unfccc.int>
Subject: Input to SB005 annotated agenda and related annexes

To whom it may concern,

We are worried about the statement in the draft document in section 3.2 regarding engineering-based activities. The pro and con list in table 3, see screenshot below.

There are several statements that needs refinement and alignment with the state of the art:

Biochar Carbon Removal (BCR) is a engineering-based carbon removal method and it is highly mature. We are working with this technology and have been in the field for over a decade.

We want to include the following as input:

- 1: Engineering-based removal activities are technologically proven when it comes to BCR (Biochar Carbon Removal). The technology readiness level (TRL) for biochar carbon removal is 8-9, with several systems already in commercial utilization.
- 2: BCR (Biochar Carbon Removal) is generating heat energy in the process, thereby serving the needs for renewable energy generation. It also utilize waste streams from society such as sewage sludge or agricultural residues, thereby serving for minimizing waste in society.
- 3: The resulting biochar carbon permanently locked away from the atmosphere creates a more climate-resilient agriculture by its water holding capacity.
- 4: It can provide for several gigatonnes of carbon removal annually and is scaleable as of today and is growing at a CAGR of 68% (in Europe, EBI Market Study 2023).

3.2. Eligibility of activity types under the Article 6.4 mechanism

39. Based on the public input from stakeholders and other sources consulted, table 3 summarizes the pros and cons of the eligibility of different types of activities under the A6.4 mechanism.

Table 3. Pros and cons of the different activity types being made eligible under the mechanism

Activity type	Pros and cons
Engineering-based activities	<p>Pros</p> <ul style="list-style-type: none">– Engineering-based removal activities result in permanent net removal of carbon dioxide from the atmosphere. <p>Cons</p> <ul style="list-style-type: none">– Engineering-based removal activities are technologically and economically unproven, especially at scale, and pose unknown environmental and social risks (P-12, R-83:a, R-84:a, R-50:c,d). Currently these activities account for removals equivalent to 0.01 MtCO₂ per year (P-15:a) compared to 2,000 MtCO₂ per year removed by land-based activities.– These activities do not contribute to sustainable development, are not suitable for implementation in the developing countries and do not contribute to reducing the global mitigation costs, and therefore do not serve any of the objectives of the Article 6.4 mechanism.

Very best,

David Andersson CEO ECOERA AB