



Article 6.4 SB response

By Email: Supervisory-Body@unfccc.int

RE: Input to SB005 2022 Annotated Agenda and Related Annexes

Dear Supervisory Body:

Thank you for the opportunity to respond to your important work to incorporate carbon removals in the implementation of Article 6.4. In particular, we want to share our thoughts on the Information Note entitled "Removal activities under the Article 6.4 mechanism" ([A6.4-SB005-AA-A09](#) version 0.40), which is intended to inform discussions at your next meeting.

We represent the Carbon Removals Doers Club, a group of over 20 organizations, working to implement or enable first-of-a-kind, commercial-scale carbon removal projects with durable storage. We embrace a range of different approaches, including direct air capture and storage (DACs), bioenergy with carbon capture and storage (BECCS), enhanced rock weathering, bio-oil and biochar. Together our projects will durably remove around 70 MT of CO₂ from the atmosphere by 2030 – still far from the scale IPCC scientists say is required by 2030 to support a 1.5°C or even a 2°C ambition.

Some of our Club members have submitted detailed responses for review. We are writing collectively to highlight several assumptions in the Information Note on carbon removals that we believe would prevent durable carbon removals from playing a role in the mechanism and block the opportunity for developing countries to leverage growth in carbon removal services for their own sustainable development.

1. Table 3.2 of the Note asserts that "engineered" CDR "activities 1) do not contribute to sustainable development, 2) are not suitable for implementation in "developing countries", and 3) do not contribute to the reduction of global mitigation costs, and therefore do not serve any of the objectives of the Article 6.4 mechanism." We believe strongly that these assertions are arbitrary and without basis in evidence, and do not reflect real world developments in the carbon removal sector.

A more rigorous engagement with these developments would support the opposite conclusion: that technology-based carbon removal pathways offer strong potential economic and sustainability benefits in the Global South. In particular, the Global South's abundance of untapped renewable energy potential is key: removal solutions with a high need for renewable energy, can provide anchor industrial demand that will enable investment in renewable energy, thus improving energy access. This abundance, paired with low existing emissions, means limited moral hazard for the deployment of new renewable energy capacity, as there is little high emission industrial infrastructure to displace.

We urge the Supervisory Body to take the time to directly engage with any of the dozens of CDR practitioners and companies currently actively planning or considering projects or activities in the Global South. The Doers Club would be pleased to help facilitate that engagement.

2. Table 3.2 of the Note asserts that "engineered" carbon removal methods are "technologically and economically unproven." CDR is a young industry, to be sure, but also a dynamic and rapidly

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evolving field that encompasses a great range of pathways and technologies, and one that continues to marshal considerable resources and investment to support extensive research and development, and accelerated rates of commercialization. This year has seen several high-volume commercial deals and offtake agreements between new durable carbon removal developers and established corporate buyers. The Doers Club would be happy to facilitate discussions with Supervisory Body members and alternates to help fill the information gap in this fast-changing area.

3. The Note's skepticism about uncertainties related to technology-based CDR today must be balanced with the reality that it will be necessary at gigatonne scale in order for 1.5C or 2C temperature change targets to be met, per the IPCC AR 6 Synthesis Report. In light of this imperative, the appropriate position on CDR, we believe, should be one focused on accelerating testing and validation of high potential pathways to mitigate uncertainties; not one that delays such necessary progress in the interest of caution.

In addition to our reservations regarding the substance of the note, the Doers Club would like to highlight our concerns related to the process behind it. Firstly, while we welcome the opportunity to contribute, the week-long "call for input" is unlikely to be a sufficient timeframe for all stakeholders to make submissions. The Body would benefit from the broadest and most inclusive consultation possible to inform its work, so we suggest extending this timeframe for future calls. Secondly, the synthesis of information in the latest of the iteration of the note does not clearly reflect the balance of stakeholder input – comments which are made by single stakeholders appear to receive the same weight of consideration as those which have been made by many stakeholders. The Doers Club would welcome a more clearly broken-down synthesis of stakeholder feedback for the Body to use, including insight into the number and diversity of stakeholders behind the highlighted responses. Finally, the Doers Club highlights the format limitations of calls for input and written responses. We see strong benefit in giving our members the opportunity to present directly to the Body and Secretariat. We stand by to either facilitate or participate in such an occasion.

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

Best regards,

The Carbon Removals Doers Club

Members of the Carbon Removals Doers Club and participants in discussions on this response include: 1PointFive, American Carbon Registry, Aperam Bioenergia, C-Capsule, Carbon Engineering, Carbonfuture, Carbonplace, Charm Industrial, Climate Action Platform - Africa, CO2.com, Drax, JPMorganChase, Kita, NextGen Facility, Northern Lights, Puro, Rubicon, Salesforce, Shopify, South Pole, Sylvera, Standard Chartered, Stockholm Exergi, UBS and Undo.

The Doers Club is part of [Rethinking Removals](#), a not-for-profit initiative focused on catalysing exponential growth in durable carbon removals.