

**From:** Hanna Ojanen <hanna@carboculture.com>  
**Sent:** Tuesday, 23 May, 2023 16:14  
**To:** Supervisory-Body <Supervisory-Body@unfccc.int>  
**Cc:** Henrietta Moon <henrietta@carboculture.com>  
**Subject:** Input to SB005 annotated agenda and related annexes

Honorable Members of the UNFCCC Supervisory Body,

Please consider our input for the SB005 annotated agenda and related annexes, especially on the [information note](#) on "Removal activities under the Article 6.4 mechanism, Version 04.0"

*Carbo Culture Oy is a Finnish-American Biochar Carbon Removal (BCR) company, removing carbon from the atmosphere through waste biomass, and storing the carbon in biochar, which is used as a soil conditioner, to retain water and nutrients, all while producing renewable energy.*

We thank the Supervisory Body for the important work that is being done on Article 6.4. mechanism and acknowledge the difficult task ahead. As a Biochar Carbon Removal (BCR) company, we wish to comment on the information note from our and the previous submissions from our peers. As BCR we can see ourselves providing the benefits listed for Land-based activities as a technology that is safe, has a high TRL (8-9) and is ready to scale today. We also provide many of the economic pros listed: improved crop yields through soil erosion control and soil fertility improvement among others.

We are however also an engineered approach to carbon removal, and fear that categorising all engineered removals as technologically and economically unproven does not reflect the state of the carbon removal industry, most certainly not that of Biochar Carbon Removal.

We view that the Article 6.4 is widely expected to deliver a global standard for methodologies for carbon removal activities, especially for novel removal activities where a lot is still being developed. Other carbon markets are currently keeping an eye on these developments. Leaving engineered removals out of the scope of Article 6.4 would be a missed opportunity to establish robust methodologies on a global level. Hence we strongly recommend keeping engineered removals within the scope of Article 6.4.

Furthermore, an increasing number of countries rely on engineered removals such as Biochar Carbon Removal among others, to achieve their climate targets. Leaving such removals left out of the Article 6.4 mechanism scope makes it more difficult to achieve the increasingly ambitious NDCs over the coming decades. As Article 6.4 is part of the toolbox to achieve net zero emissions globally, removals will become increasingly important in countries' climate change mitigation activities and therefore acknowledged in the work on the Article 6.4. Mechanism.

Yours sincerely,  
Hanna Ojanen

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