Dear Supervisory Body representative,

We appreciate the opportunity to provide our input on the Information Note on Removal Activities under the Article 6.4 Mechanism. We would like to express our disagreement with the information presented in Table 3 of Information note - Removal activities under the Article 6.4 mechanism, version 04.0, as well as our concern that BECCS as a carbon removal solution is put into question.

Specifically, we would like to address the characterization made in Table 3 regarding carbon removal using “engineering-based activities”. We are developing a solution for carbon removal, leveraging the CO2 emissions arising from biomethane production. As an organization actively engaged in carbon removal from biomethane through the use of *proven technology*, we believe it is important to correct any misconceptions or inaccuracies.

Contrary to the depiction in Table 3, carbon removal from biomethane production using proven technology, such as off the shelf liquefaction technology for CO2, is indeed a viable solution that has the potential to contribute to sustainable development. By capturing CO2 from biomethane and storing it in CO2 storage sites, such as the Northern Lights project in Norway, we effectively remove CO2 from the atmosphere, mitigating climate change impacts.

We also wish to address our concern that it is put into question whether Bioenergy with Carbon Capture and Storage (BECCS) qualifies as a removal activity. We cannot speak for all kinds of BECCS, but the biomethane markets we plan to address for carbon removal use waste streams such as sewage and food waste, as feedstocks. Indeed, the very first project we are currently developing is based on wastewater treatment in Gothenburg, Sweden. This is a good example of waste treatment without negative impacts on land use. Biomethane production itself is often advancing sustainable development, by being force for best practice waste treatment, advancing sanitation and the circular economy. There are currently no policies in place advancing biomethane and carbon removal in jurisdictions such as the EU, and there is a great need for policy mechanisms to advance this solution for carbon removal.

Moreover, this solution is not limited to developed countries only. With appropriate support and capacity-building initiatives, it can be implemented in developing countries as well – wherever there is biogas/biomethane production and a geology fit for storage, or other storage opportunities, such as storing CO2 in concrete. By fostering technology transfer and sharing best practices, we can ensure that developing nations can also benefit from carbon removal activities associated with biomethane production.

We kindly request that our concerns regarding the characterization of engineered solutions in Table 3 and our concern that BECCS should be recognized as a source of carbon removal, be duly considered and addressed. It is crucial to provide accurate and up-to-date information to foster informed decision-making and promote effective climate action under Article 6.4.

Thank you for your attention to this matter, and we remain committed to contributing to sustainable development through our carbon removal initiatives.

Sincerely,

Kaja Voss

Inherit Carbon Solutions AS