



Sent by email to:

Supervisory-Body@unfccc.int

Stockholm, 24 May 2023

To the attention of the Supervisory Body for the mechanism established by Article 6, paragraph 4, of the Paris Agreement

We thank you for this opportunity to comment on “Issues included in the annotated agenda and related annexes of the fifth meeting of the Article 6.4 Supervisory Body”.

Klimpo is an independent, non-profit organization who aims to reduce emissions of greenhouse gases globally and to achieve better conditions for companies to take climate positive initiatives. We do this by engaging with politicians, encouraging collaboration in our network, and counselling our members. In addition to our main work, we also lead several feasibility studies on BECCS, in order to help speed up the development of carbon capture in Sweden.

Observations

The Paris Agreement and its Article 6 has great potential to increase climate ambition and the Article 6.4 mechanism could become an important tool in our joint efforts to reduce greenhouse gases globally. We recognise that a reduction of emissions remains the main objective while removals will be an important complementary measure. It is therefore essential to get the governance of removals right under Article 6 of the Paris Agreement.

Sweden has set up ambitious climate goals under national law, EU law and the Paris Agreement. And engineering-based removal activities such as BECCS will play a fundamental role to attain an objective of negative emissions in a near future.

The removal method of BECCS might not be suited for all countries globally but we are convinced that it will be for countries like Sweden. We have cold winters, well managed forests and an intricate system of biomass based district heating infrastructure. Many of these district heating plants run on biomass. Such biomass originate from carefully managed forests and are residues from, by way of example, the paper industry or the wood industry. To capture the biogenic carbon dioxide will undeniably have a positive effect on our quest to reach the goals under the Paris Agreement.

The Swedish Energy Agency has calculated that there is a potential to capture 30 million tonnes of biogenic carbon dioxide per year in Sweden. The Swedish government has recognized that the municipalities and companies that own such district heating plants will not be able to finance the carbon capture equipment single-handed.

Furthermore, as recognized under the Paris Agreement as well as by the recent IPCC reports, companies and other private actors will need to play a role in combatting climate change. We know from our daily contacts



with industry representatives and financial institutions that they are all willing and ready to act. However, it is essential to have the right tools in place to enable such actions.

We therefore kindly request the Supervisory Body for the mechanism established by Article 6, paragraph 4, of the Paris Agreement to recognize that engineering-based removal activities such as BECCS are essential to achieving the objectives under the Paris Agreement and its Article 6.4.

We would especially draw your attention to *Section 3.2, section 39, Table 3 Pros and cons of the different activity types being made eligible under the mechanism*. As we are convinced that Engineering-based removal activities are technologically and economically proven and do not pose particular environmental and social risks in light of our experience of BECCS in Sweden.

Furthermore, Engineering-based removal activities do contribute to sustainable development such as the SDG 13 'Climate Action' and also serves the objectives of the Article 6.4 mechanism for removal.

We would recommend using information from a scientifically informed and balanced overview. An example of a balanced comparison with pros and cons is in the IPCC AR6 WG3 full report in chapter 12, table 12.6 "Summary of status, costs, potentials, risk and impacts, co-benefits, trade-offs and spillover effects and the role in mitigation pathways for CDR methods". The report recognises the benefit of BECCS and enumerates the following co-benefits of BECCS: *"Reduction of air pollutants; fuel security, optimal use of residues, additional income, health benefits and if implemented well can enhance biodiversity, soil health and land carbon"*.

We thank you for your attention to these above observations and urge you to allow for BECCS and engineering-based removal activities to be part of the Article 6.4 mechanism for removal under the Paris Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read "Karolina Unger". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Karolina Unger, CEO

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