



## Removal activities under the Article 6.4 mechanism: a refreshed approach for removals

Dear Members and Alternate Members of the Article 6.4 Supervisory Body,

Puro.earth is a carbon removal crediting programme and through the Puro Standard, we certify durable removal of CO<sub>2</sub> from the atmosphere. We issue CO<sub>2</sub> Removal Certificates, CORCs, per ton of CO<sub>2</sub> removed and durably stored. CORCs are issued and retired in the public [Puro Registry](#), adding transparency to carbon markets. Puro.earth welcomes the opportunity to provide input to the Article 6.4 Supervisory Body on the "information note on removal activities under the Article 6.4 mechanism" (Information Note).

In summary, we support the creation of a global market mechanism under Article 6.4 of the Paris Agreement, and ask for the inclusion of all durable carbon removals.

In order to be included, durable carbon removal methods should be able to demonstrate environmental and social safeguards, and do no significant harm, and are required to meet the long-term goals of the Paris Agreement. As shown in the [IPCC AR6 WG3 report](#) page 1264, "The volumes of future global CDR<sup>2</sup> deployment assumed in IAM<sup>2</sup>-based mitigation scenarios are large compared to current volumes of deployment, which presents a challenge since rapid and sustained upscaling from a small base is particularly difficult". This statement refers to Bio-Energy Carbon Capture and Storage (BECCS) and Direct Air Carbon Capture and Storage (DACCS), as well as removals from Agriculture, Forestry and Other Land Uses (AFOLU). We agree that sustained upscaling is required for durable carbon removal and welcome opportunities to support this scaling up such as inclusion under the Article 6.4 mechanism.

We note that the Information Note does have methodologies for engineered removals so it seems that these methods should be included in this mechanism, but we also see contradictory statements which refer to engineered removals, BECCS, DACCS and Enhanced Rock Weathering (ERW), as being unproven and therefore not applicable for the Article 6.4 mechanism.

Puro.earth has credited durable carbon removals since 2019 and we recognise that the UNFCCC processes have existed for many years more, and we might not have all the knowledge on the relevant procedures. With this in mind, we would like to suggest that the Article 6.4 Supervisory Body consider a refreshed approach for removals. We ask that this approach could include: (i) ensuring that Parties are aware of the significant choices presented in this information note through a wider dialogue, including workshops and information exchanges between experts, market actors and Parties; and in particular (ii) a deeper discussion on approaches to address non-permanence and reversals in the context of a mechanism where the outcome will count towards Nationally Determined Contributions and to enable the world to reach net zero-emissions and stay within the long-term temperature goal of the Paris Agreement.

We believe that a refreshed approach is required to fulfil the mandate given to the Article 6.4 Supervisory Body by the CMA (Conference of the Parties Meeting as Parties to the Paris Agreement). Thank you for considering this procedural request. If you have any further questions, please contact, Helen Bray, [helen.bray@puro.earth](mailto:helen.bray@puro.earth)

Kind regards,

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Ms. Marianne Tikkanen, Co-founder and Head of Carbon Crediting Program, Puro.earth

<sup>1</sup> Carbon Dioxide Removal - CDR refers to anthropogenic activities that remove CO<sub>2</sub> from the atmosphere and store it durably in geological, terrestrial, or ocean reservoirs, or in products. It includes anthropogenic enhancement of biological, geochemical or chemical CO<sub>2</sub> sinks, but excludes natural CO<sub>2</sub> uptake not directly caused by human activities. Increases in land carbon sink strength due to CO<sub>2</sub> fertilisation or other indirect effects of human activities are not considered CDR.

<sup>2</sup> Integrated Assessment Model