

2023-05-24

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To  
UNFCCC Secretariat  
Via e-mail to: Supervisory-Body@unfccc.int

## Input to SB005 annotated agenda and related annexes

with reference to UNFCCC Secretariat's *Information Note on Removal activities under the Article 6.4 mechanism* (A6.4-SB005-AA-A09, version 04.0)

Stockholm Exergi is a leading Swedish energy company mainly producing and selling district heating and also currently engaging in a first move and large scale BECCS project with permanent geological storage. The BECCS facility is to be installed next to our bio-CHP-plant in Stockholm (combined heat and power based on biomass residues). The project has, after a thorough vetting process and in competition with a large number of other projects, been granted significant financial support by the EU's Innovation Fund.

In view of the Information Note on Removal Activities under the Article 6.4 Mechanism A6.4-SB004-AA-A04, version 03.0, Stockholm Exergi submitted a consultation response on April 5, 2023. In the response we chose to support a communication by the British energy utility Drax, which pointed and objected to a number of assertions in relation to technological removals, including BECCS.

Now, version 04.0 is available and will be part of SB0005. Considering the broad range of objections expressed in relation to version 03.0, we have studied version 04.0 with considerable consternation as we have identified that the new version, rather than having provided more nuance in the description of different removal technologies, present an even more unbalanced description of the different technologies.

We strongly object to the general statement that "Engineering-based removal activities are technologically and economically unproven, especially at scale..." In reality, all elements of the BECCS value chain have been proven at scale. What is still in an early phase are full value chain implementations and its associated commercial and legal models. The fact that the volume of Engineering-based removals is limited today is in itself not an argument since the industry is currently in a scaling phase in order to meet the volume expectations as expressed in recent IPCC and other reports (c.f. IPCC AR6, WG1 Chapter 4 and 5 or WG3 Chapter 12.3; or the State of CDR Report. For aspects directly related to market based mechanisms or "offsetting", see the Oxford Principles for a Net Zero Aligned Carbon Offsetting).

The statement that "These activities do not contribute to sustainable development... and do not contribute to reducing global mitigation costs, and therefore do not serve any objectives of the Article 6.4 mechanism." is simply wrong and, again, departs from science established in the framework of the IPCC.

Furthermore, the unbalanced listing of pros and cons for Engineering-based activities and Land-based activities does not reflect the current state of science as established by the IPCC. Conspicuously missing in the listing are the food and water related challenges for Land-based activities (see for instance Table 12.6 in AR6).

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Furthermore, as referenced in our previous consultation response, the Information note still represents BECCS as an emission reduction activity, which is at odds with its status as a removal activity under the IPCC and the broader scientific consensus (paragraphs 29-32).

We would of course both welcome and be delighted to be able to participate in any form of discussion on the matter.

Sincerely,

Stockholm Exergi, 24 May 2023

  
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