

Structure Public Consultation – Removal Activities

The Global CCS Institute (GCCSI) is pleased to respond to the call for input on activities involving removals, and appreciates the work of the Supervisory Body and all other actors to date. GCCSI is an international non-profit think tank whose mission is to accelerate the deployment of carbon capture and storage (CCS), with 200 members from government and industry.

Cross-cutting questions:

1. Discuss the role of removals activities and this guidance in supporting the aim of balancing emissions with removals through mid-century.

Carbon dioxide removals (CDR) counterbalance hard-to-abate residual emissions. CDR options include Direct Air Carbon Capture and Storage (DACCS) and Bioenergy Carbon Capture and Storage (BECCS), where CCS provides the storage component of these methods.

This guidance will enable global markets to trade on removals credits, and should aim to ensure:

- 1) Removals are not used as an alternative to reducing emissions
- 2) Removals are defined according to the IPCC Sixth Assessment Report (AR6)
- 3) Monitoring, accounting, permanence and risk of CO₂ capture, transport and storage is handled appropriately, with reference to significant work done by experts, including:
 - a. The [IPCC GHG Inventory Guideline 2006 \(Vol 2 Energy, Capture 5: CO₂ Transport, Injection and Geological Storage\)](#) which includes monitoring methods and assessment of risk of leakage from a storage site
 - b. [Decision 10/CMP.7](#) in Durban on the Modalities and procedures for carbon dioxide capture and storage in geological formations as clean development mechanism project activities
 - c. The [EU CCS Directive](#) which includes monitoring requirements, storage closure and post-closure obligations with compensatory safeguards in EU legislation in case of leakage by surrendering a corresponding amount of EU ETS allowances ([Rickels et al., 2021](#))

This relates to specific elements **A, B, C, E, F and G**.

--

For further information on CCS and CDR, GGCSI offers the following publications:

Video - CCS Talks: All you need to know about CO₂ storage

https://www.youtube.com/watch?v=nGoeXOUID_U&t=473s

Factsheet - Understanding CCS: Storage

https://www.globalccsinstitute.com/wp-content/uploads/2022/07/Factsheet_CCS-Explained_Storage.pdf

CCS Networks in the Carbon Circular Economy: Linking Emissions Sources to Geological Storage Sinks

<https://www.globalccsinstitute.com/wp-content/uploads/2022/03/CCE-CCS-Networks-22-5.pdf>

The Economics of Direct Air Capture and Storage

https://www.globalccsinstitute.com/wp-content/uploads/2022/07/Economics-of-DAC_FINAL.pdf