

From: Patrizia Pschera <pschera@atmosfair.de>

Sent: Monday, 10 July, 2023 12:36

To: Supervisory-Body Supervisory-Body@unfccc.int

Subject: Structured Public Consultation - Removal Activities.

Dear supervisory body of the UNFCCC,

With this email we are referring to "Structured Public Consultation - Removal Activities".

Separate registries for emission reductions and emission removals:

We would like to draw your attention to the work of McLaren et al 2019*, which is important to keep in mind when designing Removal Activities. All possible must be done, that emissions reductions are not deterred or delayed by efforts and suggestions to use NETs to sustain fossil fuel use. We concur with McLaren et al's statement that reads: "To avoid substitution, and hence ensure negative emissions deliver the necessary additional carbon removal, we suggest that targets and accounting for negative emissions should be explicitly set and managed separately from existing and future targets for emissions reduction."

NETs are often communicated and perceived with the subtextual promise to bypass the socio-economic reconstructions that are required for a decarbonized economy that is in line with 1.5°C-goal. This is clearly not the case if one looks at the costs and energy requirements involved. The deployment and scale-up of NETs is dependent on a drastic scale-up of renewable energy technologies, what should be clearly visible, so that it can be specifically addressed and supported. Safeguards must be set in place that prevent NETs being used as an argument to sustain or encourage fossil fuel use.

McLaren et al 2019 elaborate many more impacts of non-separation of emission reductions and emission removals, e.g. mis-conceptualization of BECCS, delay of climate action and socio-technological lock-in effects.

Registry database management:

From our point of view technologies like blockchain should not be mandatory or preset. Rather a well-defined set of requirements for the technology to be used should be defined and the technology itself kept open. From our experience the data input is the weak link rather than the data storage and tracking. In addition the overhead linked to the technology used for the monitoring of a carbon project should be in line with its potential increased precision in comparison to other monitoring approaches (i.e. amount of energy used, manpower, natural resources involved).

*McLaren DP, Tyfield DP, Willis R, Szerszynski B and Markusson NO (2019) Beyond "Net-Zero": A Case for Separate Targets for Emissions Reduction and Negative Emissions. *Front. Clim.* 1:4. doi: 10.3389/fclim.2019.00004

Thank you for the opportunity to submit input.

Sincerely,

Patrizia Pschera (she/her)

Project Developer

Das Klima wartet nicht – unterstütze uns jetzt!

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