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UNFCCC Supervisory Board  
[via email]

Amsterdam, 19.06.2023

### Structured Public Consultation - Removal Activities

Dear Supervisory Board:

remove is grateful for the opportunity to provide feedback on the Article 6.4 Supervisory Body's [Information note on Removal activities under the Article 6.4 mechanism Version 04.0.](#)

remove is a non-profit organization focused on supporting European early-stage Carbon Dioxide Removal (CDR) and Greenhouse Gas Removal (GGR) startups and fostering the ecosystem. Its core activity is running Europe's first and only accelerator program solely focused on CDR and GGR, having supported more than 80 startups since 2021. Beyond that, remove engages in ecosystem building activities, policy work and thought leadership supported by its core partner, the Sustainability in Business Lab at ETH Zurich.

The startups that remove has supported display the breadth of CDR: From nature restoration efforts, enhanced rock weathering, biochar carbon removal, direct air capture, direct ocean capture, ocean alkalinity enhancement, bioenergy and carbon capture, to mineralization – carbon removal shows great diversity, not only in the CDR methods employed but also in the maturity of the solutions, their CDR quality parameters (most notably durability, risk of non-additionality and net-negativity) and the associated co-benefits. From our perspective, this diversity is not reflected in the Info Note's Framing of CDR as either "engineering-based activities" or "land-based activities", which appears arbitrary and not science-based. In fact, a narrow, closed definition of CDR runs the risk of dissuading innovation on the frontier of CDR that is not easily placed in one or the other bucket. Instead, we strongly believe that an open definition based on quality parameters can spur the research and commercialization necessary to reach the gigatonne scale CDR projected by the IPCC.

In terms of geographic scope, a substantial number of startups supported through our program such as InPlanet (Enhanced rock weathering in Brazil), Terra Preta (decentralized biochar carbon removal in Columbia) or CRTL Z (biochar carbon removal in India) have already begun to or plan to operate in the Global South with significant economic and ecological benefits for and value creation in the local ecosystems that are often the most affected by the effects of the climate crisis. In this light, we find the Info note's argument that 'engineered' CDR solution are inconsistent with sustainable development goals for the Global South incorrect and overlooking the opportunities presented by emerging and already commercial CDR methods and solutions.

We trust that our response can be of use to the Supervisory Body as it moves forward with its work.

Sincerely,

Marian Krüger

Co-Founder & Managing Director