



November 4th, 2022
Brussels

To: European Commission
Executive Vice-President Frans Timmermans
Commissioner Virginijus Sinkevičius
Commissioner Janusz Wojciechowski

RE: Carbon Removal Certification Framework

Dear Executive Vice-President Timmermans, Commissioner Sinkevičius and Commissioner Wojciechowski,

We are writing to you in the context of the anticipated proposal on the Carbon Removal Certification Framework (CRCF). We believe this piece of legislation can have merits and address a gap in the EU climate policy framework, but risks seriously undermining its own declared purpose of climate ambition. The following priorities need to be taken into account in the proposal for it to fulfil its potential, and for the EU to take a leadership position in rolling out real and sustainable carbon removals.

First, **deep emission reductions must take explicit priority over carbon removals**. While carbon removals are needed in the longer term to reach climate neutrality and net-negative emissions afterwards, we need drastic emissions reductions this decade in order to keep global warming within the Paris Agreement's

1.5°C limit. Demand for removals must not come from actors that still have scope to reduce their emissions. Polluting companies should not be allowed to use removal offsets (including uncertain and reversible offsets in the land use sector such as carbon in soils or forests) as a means of avoiding carbon pricing or emissions cuts in their own value chains.

Removals should be accounted for only once in national greenhouse gas inventories. Therefore, the deployment of **carbon removals should be supplementary to emission reductions. Offsetting continued emissions with carbon removals should be explicitly ruled out by the CRCF, even within agricultural value chains.** Supplying credits to the Voluntary Carbon Markets (VCM) should be explicitly kept out of the scope of the CRCF.

Second, the CRCF and its implementation over time through the development of specific methodologies should **focus on actual carbon removals and exclude emission reductions or avoidance.** Real removals take GHGs from the atmosphere and should have the ability to store them for (at the very least) centuries. **The Commission must clearly define and operationalise permanence of storage in the CRCF to avoid confusion later in the process, and explicitly relate minimal monitoring periods and liabilities to permanence of storage.** Differentiation between permanent and short-term storage is critical, and short or medium-term 'stores' of carbon (such as bio-based building materials, plastics or textiles, typically only usable for up to a few decades at most) should not be equated with permanent storage in any way. Different durations of likely storage should lead to a risk-based approach to reversals, including how their climate results can be used and accounted for. Products which are not designed to last for long periods of time should never count towards removal targets under the CRCF. **Bio-based materials cannot be assumed to be climate-neutral,** and biomass sourcing for long-term product storage should always follow strict ecological criteria. The overall footprint of the production cycle (including the forestry or agricultural practice involved, or the reuse/recycling method) must also contribute to net negative emissions as well as support biodiversity enhancement and nature restoration.

Third, the **role of removals in the EU climate framework should be clarified** in this proposal, as should its interactions with the LULUCF Regulation and the Common Agriculture Policy.

In addition, we encourage the Commission to **clarify the issue of liability** if or when removals are reversed, and the stored carbon enters the atmosphere again. As noted above, nature-based removals (such as those envisaged through carbon farming) are at an especially high risk of reversals. Therefore, the **certification**

framework must be limited to those CDR approaches that have lower reversal risks (rewetted peatlands, ecological forestry, and geological storage), and not those with higher reversals risks such as soil carbon sequestration. **Biodiversity enhancement must be central to certified nature-based projects** as it is the best strategy for long-term storage in the biosphere. Any remaining risk of reversals must be acknowledged and addressed, including through long-term monitoring, comprehensive private sector liabilities, a mandatory non-deterioration principle, and other relevant instruments. Reversals must also be reflected in inventories.

Finally, the **CRCF must set the bar for understanding and addressing social and environmental impacts through robust safeguards**. All removal methods, be it nature or technology-based, have the potential to cause significant and detrimental social and/or environmental impacts. These impacts can be related to biodiversity, soil quality, water use, land grabbing or energy consumption. Removal practices can also lead to increased emissions (for example through indirect land use change, deforestation or fossil energy consumption), these emissions must be fully accounted for in the certification of any removal activity (including carbon farming), such that **only the 'net' quantity of CO2 removed can be certified. The CRCF must not undermine wider environmental and social priorities, and therefore, we support a cautious approach on carbon removals**. We recognise that space and time will be needed for gaining experience and knowledge in this area, to understand various potential impacts and to address them. Carbon farming activities and long-lived products for carbon removal activities must only be eligible for certification if they have social safeguards as well as co-benefits for biodiversity and ecosystem protection and restoration.

To conclude, the CRCF has the potential to be beneficial, but the positive elements risk being undermined if openings are left for certifying low-quality removals or offsetting emission reductions with removals. The EU has the opportunity to become a global leader in setting a high bar for climate ambition, addressing adverse impacts and ecosystem integrity. We hope this opportunity will not be squandered. **We, therefore, urge you to consider these priorities, as not addressing them will lead to the CRCF undermining the environmental integrity of EU climate action and EU climate targets.**

We would like to request a meeting with you before the expected adoption of the CRCF proposal to discuss this further. Thank you for your consideration.

Cordially,

Signed,

Sabine Frank, Executive Director (Carbon Market Watch)

Justin Wilkes, Executive Director (Environmental Coalition on Standards)

Patrick ten Brink, Secretary General (European Environmental Bureau)

Jonas Helseth, Director (Bellona Europa)

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