



NGO Letter on the functioning of the Expert Group on Carbon Removal and its meetings

To: Christian Holzleitner, Head of Unit, and colleagues at Clima C.3.
Consultants assisting DG CLIMA with respect to Expert Group on Carbon Removals
Members and observers of the expert group

In light of the upcoming Carbon Removals Expert Group meeting convened by the European Commission on the 21st and 22nd of June, the undersigned organisations would like to raise a number of key concerns that the European Commission must take on board to ensure the transparent, representative and effective future functioning of this Expert Group and its meetings.

First, there are unanswered questions on the role and use of removals, the EU carbon budget and defining residual emissions. These key issues need to be discussed at the societal and policy level. The Expert Group and its work cannot be agnostic of these major issues or ignore them to focus on the details of methodologies and technical issues such as baseline setting. The 6th IPCC Assessment Report is clear: removals can not be allowed to undermine emission reductions, therefore we need a separate removals target and assurances that there will be no offsetting of emissions with removals. In the absence of clear political direction on this that is expected to come over the coming years, at the very least options need to be kept open, for example, activity-based methodologies for land-use activities instead of the current focus on result-based methodologies.

Second, agendas must be balanced and leave room for discussion. The first meeting had 27 people on the agenda: 21 men, and only 6 women - the event even started with 10 male speakers in a row. That is not a gender-balanced meeting - and this must be addressed. In addition, of the 22 non-policy maker speakers, half represented corporate interests, compared to only 2 civil society interventions and 8 academics and think tank speakers. The discussions of the Expert Group should be mainly informed by climate science and scientists of which there are many doing valuable work in this field. In this respect, the undersigned organisations have shared suggestions for speakers (including many female and academic speakers) for the upcoming Expert Group meeting that we hope will be considered seriously. Increased

transparency is also needed with regard to the setting of the agenda. Agendas for meetings should be shared well in advance, and last-minute changes to the agenda should be avoided as much as possible.

There was also insufficient time for interventions, questions and discussions. It is in public deliberations where the major strength of an Expert Group lies, and time and space need to be ensured during the plenary sessions to allow for that.

Third, the composition of the Expert Group needs revisiting. Environmental groups and the scientific community are vastly underrepresented and find themselves in a small minority, in what should be a body giving science-based input into a scientific and environmental issue of broad societal interest. There is a clear lack of academics with experience in assessing broader environmental and social impacts and limitations of CDR options. In addition, big gaps are left in areas of interest represented. For example, there are too few forest-dedicated NGOs represented (and none with voting power), and only two NGOs with strong expertise in the agricultural sector (EEB and Birdlife).

We also object to the fact that the underrepresentation of NGOs is camouflaged by several organisations with clear commercial interests having received the NGO label - which would go in against the definition of NGOs given in the call for experts. In addition, not all members of the Academia, Research Institutes and Think Tanks groupings fulfil the definition given by the Call for Experts. We welcome the Commission's promise to review the self-classification of all members of the expert group and make the necessary corrections.

Finally, in the spirit of transparency, the outcomes, detailed minutes, documents discussed during the meeting, as well as those submitted to the Expert Group secretariat, should be made public.

We look forward to seeing these changes implemented in the upcoming meetings. We believe that these changes will greatly enhance the effectiveness and credibility of the Expert Group.

Signatories - all Expert Group members and observers

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