



Reject the CRCF Delegated Act for permanent removals - it remains unsatisfactory

Brussels, 10 November 2025

Firstly, we appreciate the recent changes to the Delegated Act. Important progress has been made on several issues, for example, the review clause and the inclusion of a conservativeness factor for biochar (despite 2.5% being very low). While we welcome these changes, they are not enough for us to be satisfied with the environmental integrity of this methodology.

But consider these four flaws, among others:

1. The BioCCS and biochar methodologies insufficiently address the climate effects biomass extraction will have on the land sector
2. Minimum capture rates are not set for BioCCS
3. All activities have a zero baseline, side-lining any regulatory progress over the next 5 to 15 years and ignoring current subsidy schemes
4. Biomass feedstocks are not evaluated by their carbon payback times, leaving some of the worst eligible for the production of CRCF carbon credits.

Each of these could transform a removal activity into one that adds emissions to the atmosphere, and risk that certified projects add further pressure on the already devastated land sink.

Crucially, these shortfalls will have far-reaching implications for future EU policy. Even though we're still waiting for an impact assessment, it has become clear that the Commission will propose including DACCS and Bio-CCS credits into the EU ETS, quickly rendering what was originally intended as a voluntary scheme, a compliance instrument.

Having low-quality removal methodologies used to offset fossil emissions will inevitably compromise the ETS' integrity and further delay the much-needed decarbonisation of the EU economy.

Furthermore, since activity periods for DACCS and BECCS run for 15 years, the mistakes that have been made here and now will reverberate across this scheme well into the 2040s. For example, a project certified in 2028 will be able to use these same rules in 2043, regardless of relevant scientific updates.

It's not just NGOs that view the methodologies as unsatisfactory. Oko-Institut has found that (and I quote) "For most aspects that are key for ensuring unit integrity, the proposed CRCF methodology sets a lower standard than the PACM requirements. [...] and best practices in existing carbon crediting programmes." They see a significant risk of non-additionality and over-crediting, potentially certifying activities that actually add emissions to the atmosphere, rather than removing them. We therefore don't believe that this scheme will be among the best in the world.

Instead of the CRCF becoming a global benchmark for methodologies and removal policies, we have reached a stage where we will need to look for another gold standard to force improvements in the CRCF. This is the exact opposite of the CRCF's stated goal.

We're also worried about the excessive leeway and agency the methodology gives to operators and certification bodies to interpret and expand the rules. The text is full of issues operators should or should not be doing, environmental impacts that are to be 'evaluated and addressed'. But without concrete tests, benchmarks and rules, these stipulations are too vague and give too much freedom to look for and abuse loopholes.

While the Commission might have a final say on the alignment with the national scheme and the CRCF, and might be able to carry out limited oversight over the certification schemes, decisions on whether operators adequately implement the rules will be left to certification bodies and auditors paid by them. Considering these are likely to compete with each other on costs and for market share, we can only expect a race to the bottom.

We have raised a small subsection of problems. Addressing everything would take too long. But in light of these considerations, we call on the European Parliament and the Member States to take up your responsibility and object to this DA. We ask you to send it back to the drawing board, so that the many problems raised today and during previous sessions can

be properly addressed. If not, the scheme might hamper, rather than further climate action, and will be vulnerable to legal challenge.

And lastly, a warning to future buyers and operators: tread cautiously, as trust once lost will take a long time to regain.

We are bringing this statement on behalf of Fern and Carbon Market Watch, and would like to flag that other NGOs and NGO networks not part of this Expert Group, such as Climate Action Network Europe and WWF, have specifically called for a rejection of the Delegated Act.

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