



CRCF background information

1) Overview of the CRCF framework

The Carbon Removals Certification Framework (CRCF) is an EU voluntary framework for certifying carbon dioxide removals and emissions reductions, and it consists of several binding legal acts:

- The [Regulation](#), published at the end of 2024, which sets out the quality criteria and general governance of the scheme. This Regulation is at risk of [promoting greenwashing](#) rather than preventing it.
- The [Delegated Act establishing methodologies for permanent removals](#), now in its scrutiny period from the European Parliament and Council.
- The [Implementing Act on certification rules](#), published at the end of 2025, covering the rules on certification schemes, certification bodies, and audits. It fleshes out the details of how the CRCF will be implemented and enforced.

- The Delegated Act establishing methodologies for carbon farming, expected in the summer of 2026. A draft is currently [open for public consultation](#).

Starting with these four legislative and technical documents, the CRCF sets out to create a rulebook over three different forms of climate action: permanent carbon removals, carbon farming, and carbon storage in products. The first two entail several activities (the full scope of carbon storage in products is yet to be determined). The use cases for the credits generated by these rules, such as their possible integration into the ETS or other EU compliance or voluntary frameworks, remain to be decided.

Carbon removal activities considered permanent in the Delegated Act are:

- Direct air capture with storage (DACCS)
- Biomass with capture and storage (BioCCS), and
- Biochar.

Carbon farming covers:

- Agriculture and agroforestry on mineral soils
- Rewetting and restoration of peatlands and of other organic soils, and
- Afforestation.

Note that carbon farming addresses both temporary carbon sequestration ([the climate value of any short-term storage is zero](#)) and reductions in soil emissions.

Tailored methodologies are under development or have just been published for each of these activities. This is done through a Delegated Act - a binding non-legislative decision that details the technical rules for the implementation of primary legislation, in this case, the CRCF Regulation. During the scrutiny period which is going to last two months, the EU co-legislators (European Parliament and Council) cannot amend the final version, only vote to reject it and ask the European Commission to revise it.

2) Will the Delegated Act for permanent removals deliver for the climate?

While CRCF activities certified as permanent removals are supposed to remove carbon from the atmosphere, this [isn't guaranteed](#). The rules are not based on science, but the result of a political compromise.

The activities will have significant additional knock-on effects for the environment and climate that will not be fully or even partially accounted for (for example, the impacts on biodiversity from biomass harvesting both inside and outside the EU, and the use of fossil energy that is compensated on paper with renewable energy certificates).

These rules will drive additional logging pressures on forest ecosystems already under stress from excessive logging. Through its land use, land use change and forestry sector, the [EU currently removes around 7%](#) of the bloc's annual greenhouse gas emissions yearly, which no existing technology can replace at scale. Moreover, they clean our air, store carbon, but also support wildlife, hold water in the landscape, and help limit extreme heat, all for free as long as we let them do it. New activities pretending to address the climate crisis should not undermine these vital functions.

3) Why should legislators object to the permanent removals Delegated Act?

Following the publication of the Delegated Act for permanent removals, it will enter a scrutiny period in which the co-legislators (Parliament and Council) have two months to either accept or object to it.

Many of the legal requirements outlined in the ([already weak](#)) CRCF Regulation have not been adequately transposed into the methodologies, which creates legal risks for the Delegated Act that may cause lingering uncertainty.). To illustrate a few:

- It insufficiently addresses the climate effects that biomass extraction from ecosystems and farmland will have, including in third countries. Removing carbon from forests, the biggest land sink, rather than the atmosphere, does not help the climate in the very limited timeframe that is left for meaningful climate action, on the contrary. (Breach of Article 4 CRCF: Failure to correctly account for all associated emissions in the quantification of the net carbon removal benefit).
- It does not include appropriate monitoring and liability for biochar activities, while legally expected to comply with the requirements of the Carbon Capture and Storage (CCS) Directive. Monitoring of biochar is only relevant to the 'application' of biochar and not to its 'permanence' of storing removed CO₂. (Breach of Article 6 CRCF: failure to correctly implement MRV and liability requirements).
- It does not include appropriate safeguards to make sure certified activities comply with the Do No Significant Harm Principle. Carbon removal activities under the proposed methodology could cause climate, biodiversity, pollution, and adaptation

harms. (Breach of Article 7 CRCF: failure to comply with the Do No Significant Harm principle).

These risks could lead to a certified removal activity actually adding emissions to the atmosphere rather than removing carbon from it, the opposite of what was expected from these rules.

We believe that these mistakes can be rectified, but to do so co-legislators must object to the Delegated Act and send it back to the drawing board.

4) Policy implications in the post-2030 climate policy framework

The dire state of the permanent removal methodologies has serious implications for the future of EU climate policy. The use case of units has not been defined, so offsetting, for example at the company level, remains a realistic outcome - including potential offsetting through other climate policies such as the EU Emission Trading System as envisaged by the 2040 climate target compromise text.

If the current rules for quantifying permanent removals stand, they risk significantly undermining EU climate targets. Such poor policy choices may hamper the EU's path to climate neutrality and are counter productive towards the bloc's efforts in achieving essential decarbonisation. The low quality credits generated by this scheme would expose potential buyers of these units on the voluntary carbon market to greenwashing accusations.

5) Clean up the Act

CRCF is currently viewed as only a small cog in the EU climate policy machine, but it plays a crucial function as a fundamental facet of any policy related to permanent removals, the land sink or agricultural emissions. The Delegated Act under scrutiny will be the building block for any policy that seeks to promote or use permanent removals far into the future.

That means that any (mis)use bears serious risks for future climate policy. It is therefore crucial that co-legislators object, sending it back to the Commission to deliver a scheme that delivers on its promises.

We need credible rules for the quantification of permanent removals, but these are not.