Carbon Removals Expert Group | 23 April 2026

Joint Statement

We welcome, as always, the opportunity to share our feedback on the methodology. This statement is presented on behalf of EEB, Carbon Market Watch, ECOS, and Bellona.

We welcome a few minor changes made to the text, such as the clarification on what renewal of an activity period entails, the added criterion for model selection, the inclusion of landslides and flooding in the risk profile, and the explicit mention that operators are fully liable in the case of an avoidable reversal.

That said, we see many points that still need improvement, and unfortunately, they mostly relate to issues that members of this Expert Group have raised before. I would put them in three categories: 1) insufficiently addressed, 2) not addressed, and 3) completely ignored. I give you some examples:

Insufficiently addressed:

1. Whereas carbon farming activities should actively reduce the use of pesticides, the current text merely requires no increase. We previously highlighted that measuring the amount of pesticide fails to account for toxicity, but now the text has become even more flexible in assessing pesticide use.
2. Making the risk rate for the buffer contribution a floor and allowing certification schemes to set rules on insolvency ultimately depends on the goodwill of the operator or the certification scheme. This means disparity in implementation and consequently in project quality.
3. The baseline should be updated upon recertification to avoid overestimation and overcrediting. Also, the role of downward adjustments is not to update baselines, but to increase the ambition of the baseline.
4. There need to be much clearer guidelines on the use of biochar in agricultural soils, given its diverse potential effects on soils. Also its accounting needs to be clarified to ensure that double counting of biochar carbon across methodologies can be avoided. Due to the uncertainties under the permanent removals biochar methodology, as well as on the soil effects, we would advise to not allow for biochar to be used to generate additional carbon farming credits.

Not addressed:

We requested a series of changes that would improve the robustness and integrity of the certification, but instead:

1. Monitoring periods have been shortened, despite these being a key mechanism for detecting reversals and ensuring the continuation of the practice.
2. The uncertainty deduction factor has been lowered from 10% to 8%.

3. After further weakening, compliance with the obligation to generate biodiversity co-benefits now applies to “at least one practice”. This means that a single practice in a mix of many could allow the project to be certified, which is problematic given the open-ended practice list.

There are three major issues in this “not addressed category” even though we have supplied evidence for the importance of these issues, and offered potential solutions.

4. Common Practice assessment: the data gathered under the Common Agricultural Policy such as the uptake of eco-schemes across different Member States can help in establishing common practice. All the information on practices is available at MS or even regional level through the CAP.
5. For ILUC, emission factors are already being used to correct mitigation impact in other schemes. Despite their uncertainty, using them is better than assuming there is no ILUC.
6. As for land speculation, this phenomenon has been widely documented, for instance by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, but also by news outlets. If this scheme is meant to help farmers, who often do not own but rent the land, it is unclear why the Commission is happy to proceed without any social safeguards.

Completely ignored:

1. The GHG associated section of the methodology now refers to the need to compare to a counterfactual baseline scenario, which we welcome. So we ask again, why are the methane emissions from livestock not included in the associated emissions?
2. We raised the environmental risks of nitrification inhibitors and the need to include instructions and safeguards to demonstrate that their use has no negative impacts on water quality and soil biodiversity - this has not been acted upon.
3. And finally, our comment regarding the albedo effects of land changes was left unanswered.

As I said at the beginning, there are many points that need improvement. If this is the text that will be presented to the co-legislators, we will certainly urge them to ask the Commission to fix all remaining issues. At present, the rules do not guarantee quality, or the absence of negative effects, and risk significantly overestimating climate benefits.

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CARBON MARKET WATCH

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