

Certification of carbon removals – EU rules

A Eurelectric response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2022/12.105/16

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May 2022

RECOMMENDATIONS

- Eurelectric welcomes and supports the European Commission initiative to prepare an EU-wide and robust certification system for carbon removals in the near-term.
- The ambition level of 5 MtCO₂ industrial carbon removals by 2030, as suggested in the COM's Sustainable Carbon Cycles communication, seems to be on the low side, bearing in mind both the current plans in the business community and the parallel target which the COM is proposing for carbon farming (42 Mt CO₂ by 2030).
- Carbon removals are indispensable for reaching the EU's climate-neutrality goal for 2050 and the EU climate policy framework needs to be urgently reformed with a view to support this type of climate activities. However, while recognizing the need of carbon removal in industrial sector beyond 2030, the EU regulation should incentivize to pursue GHG abatement (e.g. through RES, electrification) when feasible, limiting carbon removal to those activities that can deliver negative emissions, or not be otherwise avoided in hard to abate sectors
- A special focus is needed on technology-based carbon removals. These can be measured and verified more accurately than nature-based solutions, while also offering more high-quality and long-duration (permanent) removal of CO₂ from the atmosphere . Consequently, The EU certification framework should allow different types or sub-categories of certificates to better reflect the diversity of carbon removal solutions and their characteristics and ensure market integrity.

Given the need to ensure that emissions removed from the atmosphere remain stored, The EU regulatory framework should also mandate multi-year monitoring plans at the outset of the certification procedure.

- While the result of a carbon farming project naturally belong to the LULUCF sector, the result of an industrial carbon removal project is more reasonably counted against the national ESR targets. Further assessment is needed around the role of carbon removals and the associated credits in the EU ETS domain. When creating the certification system the Commission must ensure the integrity of the existing legal framework of the EU ETS and its rules for the monitoring and reporting of emission. This existing framework should provide the foundation for the certification of industrial carbon removals in the upcoming EU regulatory framework.
- We support the establishment of a baseline; the EU certification framework should allow for a variety of baselines and additionality criteria to cater for different types of removals

- Double counting or double claiming of the same carbon removal must always be avoided. Independent private entities should be in charge of the certification process, guided by strict public control.
- The definition of RFNBO in the Directive on renewable sources does not specify the origin of carbon used in the process which leaves the opportunity to use fossil CO₂ to produce e-methanol that can qualify as RFNBO. If the origin of carbon for the production of RFNBO were to be specified in future pieces of legislation, biogenic CO₂ quantities can be limited and technologies for Direct Air Capture (DAC) of CO₂ will not be available shortly at affordable costs. Regarding industrial CO₂, 'avoidable' CO₂ is emitted during the combustion of fossils needed for the energy input in the process and 'unavoidable' CO₂ is intrinsically emitted by the process itself. As a result, the use of 'unavoidable' emissions of CO₂ should remain among possible options for industries and the e-methanol produced should be considered as RFNBO.
- There is today a growing consensus regarding the need to develop at an industrial scale synthetic fuels in order to be able to reach our decarbonation goals (e.g targets of ReFuelEU Aviation proposal¹ with 2 % of SAF in 2025 until 63 % in 2050). The challenges are important to develop viable and affordable industrial processes and therefore the use of unavoidable industrial CO₂ seems the only realistic way to develop those routes in the short to medium term.
- A certification system for carbon removals alone is not enough to promote this type of climate projects. New policy incentives need to be developed in parallel, which lead to an increased demand for these credits including support schemes and EU funds. And doing it only for the EU's post-2030 legislative cycle, as suggested by the EU-Commission, will be insufficient.
- Eurelectric supports the EU Green Deal Climate Target for 2030 and the Net Zero target for 2050. Eurelectric is a vocal supporter of the accelerated energy transition, leading the charge in decarbonisation and promoting cost-efficient decarbonisation & electrification across Europe. A key component to reach our targets are to create sustainable carbon cycles.

¹ Proposal for a regulation of the European Parliament and of the Council on ensuring a level playing field for sustainable air transport, July 2021.

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Fields marked with * are mandatory.

Introduction

Responding to the urgency of climate action highlighted in the successive assessments of the Intergovernmental Panel for Climate Change (IPCC), the European Union has set in law its objective of economy-wide climate neutrality by 2050. The European Climate Law requires greenhouse gas (GHG) emissions and removals to be balanced within the European Union at the latest by 2050, with the aim of achieving negative emissions thereafter. Each single tonne of CO₂eq emitted into the atmosphere will have to be neutralised by a tonne of CO₂ removed from the atmosphere. To scale up carbon farming and industrial solutions for removing carbon from the atmosphere, the European Commission is working towards a legislative proposal in 2022 on a regulatory framework for the certification of carbon removals.

As underlined in the Communication on Sustainable Carbon Cycles, the establishment of the certification framework will be an essential stepping stone towards the transparent recognition of activities that remove carbon from the atmosphere in an environmentally sound manner. The certification rules should therefore set scientifically robust requirements for quality of measurement, monitoring, reporting and verification of the carbon removed from the atmosphere, the duration of the storage, the risk of reversal and the risk of carbon leakage increasing GHG emissions elsewhere. Requirements should also be set for the amount and type of energy used for the carbon removal process. The certification rules should put in place robust safeguards to make sure that carbon removal activities do no harm to biodiversity and other sustainability objectives. This is important to ensure that the EU can claim domestic climate neutrality while helping to achieve other objectives of the European Green Deal.

This public consultation invites public administrations, academic institutions, businesses, organisations and individuals to contribute to the preparation of an EU regulatory framework for the certification of carbon removals. The findings of the consultation (which will be summarised and published) will inform the impact assessment accompanying the Commission proposal on this initiative.

Guidance on the questionnaire

This public consultation consists of some introductory questions on your profile, followed by a questionnaire. Please note that you are not obliged to reply to all questions.

At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire and uploaded position papers and policy briefs will be published online. Please read the specific privacy statement attached to this consultation stating how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the register of interest representatives (if you have not already done so). Registering commits you to complying with a code of conduct. If you do not wish to register, your contribution will be handled and published with contributions received from individuals.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
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- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
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- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Eivind

* Surname

Steen

* Email (this won't be published)

esteen@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
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| ☐ Austria | ☐ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |
| ☐ Bahamas | ☐ French Guiana | ☐ Mexico | ☐ Somalia |
| ☐ Bahrain | ☐ French Polynesia | ☐ Micronesia | ☐ South Africa |
| ☐ Bangladesh | ☐ French Southern and Antarctic Lands | ☐ Moldova | ☐ South Georgia and the South Sandwich Islands |
| ☐ Barbados | ☐ Gabon | ☐ Monaco | ☐ South Korea |
| ☐ Belarus | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |
| ☒ Belgium | ☐ Germany | ☐ Montenegro | ☐ Spain |
| ☐ Belize | ☐ Ghana | ☐ Montserrat | ☐ Sri Lanka |
| ☐ Benin | ☐ Gibraltar | ☐ Morocco | ☐ Sudan |

☐ Bermuda	☐ Greece	☐ Mozambique	☐ Suriname
☐ Bhutan	☐ Greenland	☐ Myanmar/Burma	☐ Svalbard and Jan Mayen
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden
☐ Bonaire Saint Eustatius and Saba	☐ Guadeloupe	☐ Nauru	☐ Switzerland
☐ Bosnia and Herzegovina	☐ Guam	☐ Nepal	☐ Syria
☐ Botswana	☐ Guatemala	☐ Netherlands	☐ Taiwan
☐ Bouvet Island	☐ Guernsey	☐ New Caledonia	☐ Tajikistan
☐ Brazil	☐ Guinea	☐ New Zealand	☐ Tanzania
☐ British Indian Ocean Territory	☐ Guinea-Bissau	☐ Nicaragua	☐ Thailand
☐ British Virgin Islands	☐ Guyana	☐ Niger	☐ The Gambia
☐ Brunei	☐ Haiti	☐ Nigeria	☐ Timor-Leste
☐ Bulgaria	☐ Heard Island and McDonald Islands	☐ Niue	☐ Togo
☐ Burkina Faso	☐ Honduras	☐ Norfolk Island	☐ Tokelau
☐ Burundi	☐ Hong Kong	☐ Northern Mariana Islands	☐ Tonga
☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Turkey
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palau	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Palestine	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Panama	☐ Ukraine
☐ China	☐ Israel	☐ Papua New Guinea	☐ United Arab Emirates
☐	☐	☐	☐

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| ☐ Christmas Island | ☐ Italy | ☐ Paraguay | ☐ United Kingdom |
| ☐ Clipperton | ☐ Jamaica | ☐ Peru | ☐ United States |
| ☐ Cocos (Keeling) Islands | ☐ Japan | ☐ Philippines | ☐ United States Minor Outlying Islands |
| ☐ Colombia | ☐ Jersey | ☐ Pitcairn Islands | ☐ Uruguay |
| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
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| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena, Ascension and Tristan da Cunha | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Kitts and Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose

behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Questions

Scope

Question 1: What in your view are the main challenges regarding the integration of carbon removal in EU climate policies?

at most 3 choice(s)

- ☒ Ensuring that strong action to reduce emissions is not undermined by shifting focus on carbon removals.
- ☐ Ensuring a net contribution from removals to the achievement of climate neutrality.
- ☒ Ensuring precise, accurate and timely measurement for removals.
- ☐ Providing sufficient guarantees for the duration of carbon storage and the prevention of reversals.
- ☐ Avoiding potential negative environmental impacts and complying with sustainability principles.
- ☒ Fostering cost-effective carbon removal solutions.
- ☐ Guaranteeing transparency of the benefits and costs of carbon removals.
- ☐ Setting appropriate baseline and demonstrating the additionality of removals.
- ☐ Other

Question 2: What should be the main criteria defining the types of carbon removals that EU climate policies should incentivise?

at most 3 choice(s)

☐

Technical readiness and economic feasibility

- ☒ Potential for deployment at large scale
- ☒ Robustness of monitoring, reporting and verification aspects
- ☐ Affordability of monitoring, reporting and verification aspects
- ☒ Duration of carbon storage
- ☐ Risk of intentional or unintentional reversal of carbon removals
- ☐ Potential environmental co-benefits
- ☐ Potential social benefits
- ☐ Other

Question 3: Taking account of the aspects identified in the previous question, what carbon removal solutions should EU climate policies incentivise and in what time horizon?

Carbon farming solutions enhancing ecosystem removals

	As soon as possible	After 2030	Towards 2050	Never	No opinion
Afforestation under ecological principles	☐	☐	☐	☐	☐
Reforestation and forest restoration	☐	☐	☐	☐	☐
Sustainable forest management	☐	☐	☐	☐	☐
Agroforestry and mixed farming	☐	☐	☐	☐	☐
Increase of soil organic carbon on mineral soils	☐	☐	☐	☐	☐
Increase of soil organic carbon on organic soils	☐	☐	☐	☐	☐
Wetlands and peatlands restoration	☐	☐	☐	☐	☐
Costal marine ecosystem restoration and preservation	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐

Industrial solutions for carbon removals

	As soon as possible	After 2030	Towards 2050	Never	No opinion
Biochar	☒	☐	☐	☐	☐
Direct air capture with long-term or permanent carbon storage	☒	☐	☐	☐	☐
Bioenergy with carbon capture and long-term or permanent storage	☒	☐	☐	☐	☐

Geological storage of non-fossil CO2	☒	☐	☐	☐	☐
Bio-based products with long lifetime (including for construction)	☒	☐	☐	☐	☐
Utilisation of non-fossil CO2 in long lifetime products	☐	☒	☐	☐	☐
Enhanced rock weathering	☐	☐	☐	☐	☒
Other	☐	☐	☐	☐	☐

Would you have any additional comments on scope, please specify:

2500 character(s) maximum

"while recognizing the need of carbon removal in industrial sector beyond 2030, the EU regulation should incentivize to pursue GHG abatement (e.g. through RES, electrification) when feasible, limiting carbon removal to those activities that can not be otherwise avoided in hard to abate sectors"

Actions related to the restoration of the environment should be prioritised even if they were not linked to carbon sinks.

Biochar: pyrolysis produces large amounts of biochar. It is unclear what the needs of biochar will be. New uses may need to be developed for this solution to be efficient.

DAC: promising solution that requires investments but may not be mature in the next decade

BECCS: it depends on what type of biomass is used, sustainability criteria etc. Large volumes may be an issue.

With regards to CO2 storage development the origin of the CO2 is not very relevant. Regarding CO2 embedded in construction materials for now the storage capacity is small and requires large volumes of concrete, but developments may happen in the future.

The benefits of a certification framework to scale up high-quality carbon removals over the coming years

Question 4: Would you agree that establishing a robust and credible certification system for carbon removals is the first essential stepping stone towards achieving a net contribution from carbon removals in line with the EU climate-neutrality objective?

- ☒ Yes
- ☐ No
- ☐ No opinion

Question 5: What would be the main objectives for the certification of carbon removals?

at most 3 choice(s)

- ☐ To increase the transparency and level playing field of voluntary carbon markets.

- ☒ To allow comparability and competition between different carbon removal solutions
- ☐ To provide better public incentives for nature-based and industrial carbon removals in EU and national funding programmes.
- ☐ To provide better financial incentives for land managers (e.g. purchasers of food and biomass products reward climate-friendly agriculture through price premiums or incentive payments – often called ‘in-setting’).
- ☐ To provide better financial incentives for carbon-storage products (e.g. bio-based products, woody construction material).
- ☒ To increase transparency in corporate sustainability reporting and foster the credibility of climate-neutrality claims.
- ☐ To support the labelling of sustainable products.
- ☒ Other

Please specify:

500 character(s) maximum

development of a EU-wide market for carbon removal certificates
 midterm possible integration of technical carbon removal solutions in the EU-ETS
 To support the labelling of sustainable products
 To increase the transparency and level playing field of voluntary carbon markets.

The role of the EU in the certification of carbon removals

Question 6: Which role should the EU take in the certification of carbon removals?

- ☐ Voluntary carbon markets work well. There is no need for an additional intervention by the EU.
- ☐ The EU should establish minimum standard requirements on reporting transparency for carbon removals.
- ☒ The EU should establish comprehensive standard requirements for carbon removals, e.g. on monitoring, reporting and verification, on the duration of the removal or baseline setting and additionality.

Question 7: What functions in the certification process should be carried out by private or public entities?

	Independent private entities	Public administration	No opinion
Establishment of certification methodologies	☐	☐	☒

Establishment of the system for accreditation of certification bodies	☒	☐	☐
Validation of the carbon removal project (ex-ante)	☒	☐	☐
Verification of removals made (ex-post)	☒	☐	☐

Would you have any additional comments on the role of the EU in the certification, please specify:

2500 character(s) maximum

The system should be based on sustainability criteria of biomass fuels from renewable directive: public administration should establish certification methodologies and the system for accreditation if certification bodies; independent private entities (designated by public authorities) could validate and verify carbon removals.

Certification methodologies

Question 8: Carbon removal solutions can differ significantly, for example as regards duration of removals or robustness of monitoring, reporting and verification. In this context, do you think an EU certification framework should allow different types of certificates for different types of removals?

- ☐ The EU certification framework should define only the minimum criteria for the certification and should not comprehensively define the certificates.
- ☐ The EU certification framework should only allow a single type of certificate to ensure equivalence of certified carbon removals.
- ☒ The EU certification framework should allow different types or sub-categories of certificates to better reflect the diversity of carbon removal solutions and their characteristics.

Question 9: Apart from diverging durations of existing carbon removal solutions, storage may also be prematurely interrupted and carbon may consequently be released back into the atmosphere. What approach could better manage this risk of intentional or unintentional reversal of carbon removals?

- ☒ Make removal providers liable for any reversal of removals and require them to offset any reversal.
- ☒

Encourage or require carbon removal providers to set up insurance systems or multi-project pooling mechanisms.

- ☒ Require commitment to multi-year monitoring plans at the outset of the certification procedure.
- ☐ Issue certificates with specific durations (e.g. 5, 7 or 10 years) that can be renewed.
- ☐ Require methods with a risk of reversal to be discounted or require a share of the removals to be stored in a buffer account (e.g. 10 to 25 per cent of the expected removals).
- ☐ Other

Question 10: In voluntary carbon markets, the use of baseline and additionality concepts aims to quantify and reward only additional removals, i.e. those that go beyond a pre-identified baseline and would not have occurred in the absence of the incentives from the carbon removal mechanism. To what extent do you think the EU certification framework should include the concepts of baseline and additionality?

- ☐ The EU certification should establish a single methodology to define the baselines and assess additionality.
- ☒ The EU certification framework should allow for a variety of baselines and additionality criteria to cater for different types of removals.
- ☐ To best adapt to the use of the certificates in a specific context, the certification framework should not prescribe definitions for baseline and additionality criteria.
- ☐ Other

Question 11: What information should the certification for carbon removal disclose?

- ☒ Type of carbon removals
- ☒ Quantity of carbon removed
- ☒ Information on the carbon removal provider
- ☒ Information on the certificate owner
- ☒ Information on monitoring, reporting and verification processes
- ☒ Duration of carbon storage
- ☐ Risk coverage and safeguards on sustainability objectives
- ☒ Environmental benefits
- ☒ Social benefits
- ☐

Information on the baseline and additionality of the removal

- ☒ Information on the use of the certificate and its contribution to the Paris Agreement with a view to avoiding double counting
- ☐ Price if the certificate has been traded
- ☐ Other

Would you have any additional comments on on certification methodologies, please specify:

2500 character(s) maximum

Final remarks

Finally, are there any other important aspects that should be considered in establishing a regulatory framework for the certification of carbon removals in the EU?

- ☒ Yes
- ☐ No

Please provide your additional remarks:

5000 character(s) maximum

Capturing CO₂ from industrial processes brings significant benefits and it is more competitive and mature than DAC. The consultation should focus more of this source of co₂.

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Any document you upload will be published alongside your replies to the questionnaire, which is the essential input for this public consultation. An uploaded document is an optional addition and will serve as further background reading to better understand your position.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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Contact

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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