

ZEP Briefing – Proposal for a Union certification framework for carbon removals

Background

On 30 November 2022, the European Commission (EC) adopted a [proposal](#) for a Regulation establishing a certification framework for carbon removals. With this proposal, the EC follows up on the [Communication on Sustainable Carbon Cycles](#) (2021) and lays out the elements that would encompass a voluntary harmonised framework to certify high-quality carbon removals in the EU, setting out to achieve the following four objectives:

- Support the scale-up of carbon removal solutions, contributing to the EU's climate goals
- Improve the EU's capacity to quantify, monitor and verify carbon removals
- Increase transparency and thus improve stakeholder trust and prevent greenwashing
- Enable innovative financing options, leveraging on the private and public sectors

The framework would cover nature-based solutions (carbon farming), technology-based solutions that enable permanent storage – such as direct air carbon capture and storage (DACCS) and bioenergy with carbon capture and storage (BECCS) – as well as carbon storage in long-lasting products and materials.

Key elements of the proposal

The proposal is structured around four sections which lay down definitions and the scope of the initiative, the quality criteria for carbon removal activities, the guidelines for verification and certification, and a procedure for the recognition of certification schemes that can be used to demonstrate compliance with the framework.

Definitions and scope

Carbon removals are defined as ‘the storage of atmospheric or biogenic carbon within geological carbon pools, biogenic carbon pools, long-lasting products and materials, and the marine environment, or the reduction of carbon release from a biogenic carbon pool to the atmosphere’.

The concept of ‘permanence’ is equated to carbon storage for ‘several centuries’, under normal circumstances and appropriate management practices.

With the exception of emissions from sustainable biomass, only carbon emissions that do not fall under the scope of the EU ETS would be eligible for certification under the meaning of the proposed framework.

Quality criteria

The proposed regulation establishes four quality criteria which will be detailed in the certification methodologies:

- Quantification – carbon removal activities must provide a net carbon removal benefit, which is computed against a baseline and takes into account direct and indirect

emissions. The baseline would reflect the standard performance of comparable activities (in similar social, economic, environmental and technological circumstances and geographical context), or, where that is not possible, be project-specific, i.e., computed based on an operator's individual performance. The baseline should be periodically updated.

- **Additionality** – to qualify as 'additional', carbon removals need to go beyond existing legal requirements and to take place due to the incentive provided by the certification.
- **Long-term storage** – carbon removal activities shall aim to ensure permanent storage, monitor and mitigate reversal risks and be subject to appropriate liability mechanisms over an activity-specific monitoring period. The proposed framework also contends that carbon stored by carbon farming activities and in long-lasting products and materials is considered released at the end of the monitoring period.
- **Sustainability** – carbon removal activities must comply with minimum sustainability requirements, contributing to a neutral or positive impact in climate change mitigation and adaptation, water and marine resources, circularity, pollution control and biodiversity.

Third-party verification and certification

The issuance of certificates will be conducted by *certification bodies* which shall be accredited by national accreditation authorities and must be independent from the operator(s) that carries out the carbon removal activity. Member States will supervise the operation of accredited certification bodies.

The certification of carbon removal activities would be operationalised through a four-step process:

1. Operators submit an application to join a certification scheme
2. Upon acceptance, operators submit a description of the carbon removal activity to a certification body
3. The certification body conducts an audit (and subsequently, re-certification audits) to confirm compliance and issues a certification audit report, including a certificate
4. Relevant information and documentation on certified activities are recorded in interoperable and publicly accessible registries, which will be maintained by certification schemes

Recognition of certification schemes

To ensure compliance with the framework, certification schemes must be recognised by the EC through a decision (valid for no more than 5 years) and based on rules which will be further detailed in implementing acts. Application for recognition is done by Member States or legal representatives, depending on whether the certification scheme is managed by a public or private organisation (respectively).

Next steps

The proposal falls under the Ordinary Legislative Procedure (former co-decision) and will now be discussed by the European Parliament and the Council. The final text of the Regulation will be the result of negotiations between EU institutions.



Building upon the proposed certification framework, the EC will develop tailored certification methodologies for carbon removal activities – and adopt them through delegated acts. For this task, the EC will be supported by an [expert group on carbon removals](#), which will first meet in Q1 2023.

Certification methodologies and the details on auditing rules, the standards to be upheld by certification schemes, as well as the minimum information to be contained in the certificates will be set out in secondary legislation – through implementing acts and delegated acts.