

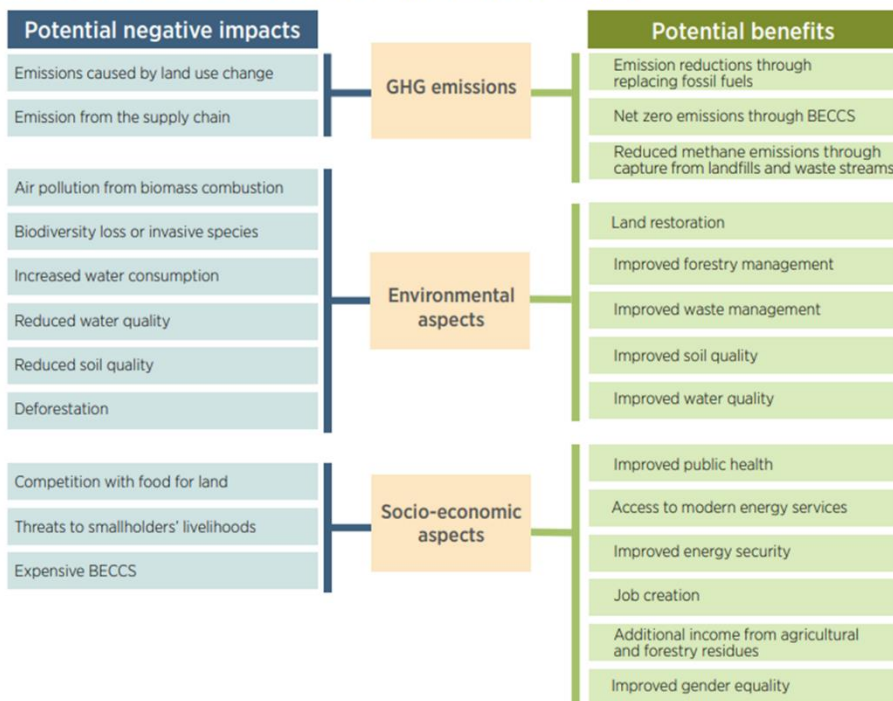
## Feedback on the Article 6.4 Supervisory Body’s fifth meeting’s annotated agenda and related annexes

The Bioenergy Association of Finland would like to give its feedback related to the information note prepared by the UNFCCC Secretariat regarding removal activities under the Article 6.4 mechanism. In particular, we comment Section 3.2. on the eligibility of activity types under the mechanism as well paras 23-25 and paras 29-32.

There is an urgent need to slow down the increase of and, eventually, to reduce the concentration of CO<sub>2</sub> in the atmosphere. To achieve that, we must deploy all types of carbon removal solutions at scale as fast as possible. It is alarming that a document that should support the work of the Supervisory Body in developing recommendations on activities involving removals, does not recognize in its Table 3 the scientifically proven role of technological carbon removal activities as vital for reaching the well-below 2°C target of the Paris Agreement and thus as an essential part of Article 6.4 mechanism. These activities do serve the objectives of the Article 6.4 mechanism as they can offer permanent carbon removals, an urgently needed part of climate change mitigation toolbox globally.

The categorical argument in Table 3 that engineering-based removal activities do not contribute to sustainable development is strange. It has been clearly outlined e.g. by IRENA (see below) that the use of biomass (in this case BECCS) can have multiple socio-economic and environmental benefits.

**Figure S1. Potential aspects related to bioenergy sustainability**



Note: BECCS = bioenergy with carbon capture and storage; GHG = greenhouse gas.

Source: IRENA, Bioenergy for the Energy Transition – Ensuring Sustainability and Overcoming Barriers, August 2022

Similarly, it is astonishing that Table 3 argues that engineering-based removal activities “are not suitable for implementation in developing countries and do not contribute to reducing the global mitigation costs”. Whether these activities can contribute and are suitable for implementation, should be left to market participants to decide. So far one key obstacle for building engineering based removals in developing countries has been lack of national and supranational policy instruments in their territories. Clear global mechanisms, as now prepared under article 6.4 are fundamental to overcome this.

In Table 4 it is argued that Bioenergy with CCS (BECCS) is at a very low TRL level (5-6). Fuss and Johnsson ([2021](#)) concludes, however, that “based on practical experience ... as well as the authors’ discussions with industry it can be argued that CCS is at a high technology readiness level (TRL), i.e., 8 or 9.”. This is also supported by the fact that several projects are under development in Sweden and Denmark (see e.g. [Orsted](#) or Stockholm Exergi that has recently started an EIA process about a large-scale BECCS investment).

Regarding paras 23-25 and 29-32 we believe the approach taken for the temporal boundary of removals is artificial and misleading. All biomass harvested for energy or other use is recognised as an emission in the LULUCF sector of the GHG inventories of the participating countries. This should be a sufficient basis for considering all biogenic CO<sub>2</sub> captured and verifiably stored as a removal irrespective of the exact timing of sequestration from the atmosphere. Methods that deviate from the IPCC guidelines should not be invented in the Article 6.4. mechanism.

As the Article 6.4 is expected to deliver a global standard for methodologies for carbon removal activities, leaving technological carbon removal activities out of the scope of the system would be a missed opportunity to establish common and robust methodologies for these solutions on a global level and would send an extremely disturbing signal for the industry. The Article 6.4 mechanism should have a long-term perspective and not just look forward to the next five to ten years. It should include the potential of evolving technologies and research, which can lead to possibilities that are yet unidentified or considered otherwise difficult to bring to action, both in the development of technological methods and in natural sinks.

The Article 6.4 mechanism can play a crucial role in increasing climate ambition globally. However, for the system to live up to the expectations, it is essential to shape the governance right and include all of the potential methods that are needed in order to reach the climate targets.