

EU Buyers Club Survey

Fields marked with * are mandatory.

ABOUT YOUR ORGANISATION AND YOUR EXPERIENCE WITH THE CARBON FARMING MARKET

The European Commission is currently implementing the [Carbon Removals and Carbon Farming Framework \(CRCF\)](#), a voluntary EU framework designed to certify high-quality carbon removals and carbon farming activities, with the objective of ensuring credibility, transparency and environmental integrity across this emerging market.

As part of this work, the European Commission is exploring the establishment of an EU Buyers' Club to help stimulate and structure demand for CRCF-certified units, notably by mobilising and coordinating voluntary public and private buyers.

In this context, the Commission invites you to share your views in this survey, focusing on barriers and motivations to invest in carbon farming activities specifically, as well as the role that an EU Buyers' Club and an associated EU Purchasing Facility could play in stimulating demand for CRCF-certified carbon farming units.

Survey Closure: 2026, 26 May

Approximated answer time: 25 minutes

*** What is your full name?**

Erika Laajalahti

*** What organisation do you represent?**

Bioenergia ry - The Bioenergy Association of Finland

*** What type of organisation do you represent?**

Select the option that best describes your organisation.

Company / business

- Business association
- Academic / research institute
- Non Governmental Organisation (NGO)
- Public authority
- Citizen
- Other (please specify)

*** What sector(s) does your organisation operate in?**

Select the option(s) that best describes your sector(s) of activity.

- Farming
- Agricultural Inputs
- Agri-food Industry
- Retail and Wholesale
- Forestry: primary production, owner
- Forestry: woodworking industry
- Other industry (please specify)
- Financial services
- Other (please specify)

*** Please specify the sector your organisation operates in.**

Bioenergy and biochar sectors.

*** How would you describe your organisation's role in the carbon farming ecosystem?**

Select all that apply.

Carbon farming refers to land management practices - like regenerative agriculture - that enhance carbon sequestration - the process of capturing and storing CO2 emissions - in forests and soils. These practices can also reduce GHG emissions from soils, while delivering additional benefits in terms of biodiversity and ecosystem restoration. (Source: European Commission)

- My organisation is interested in buying carbon credits from carbon farming
- My organisation is interested in promoting carbon farming action in its value chain (e.g. investing to enhance resilience or to claim emissions reductions and/or removals in scope-3 reporting)
- My organisation implements carbon farming on the ground (farmer / forest owner / land manager / project developer / aggregator)
- My organisation facilitates carbon farming markets (Intermediary / broker / reseller / certification scheme / registry)
- My organisation supports carbon farming operators by providing MRV (monitoring, reporting and verification) services
- My organisation carries out scientific research to expand the knowledge on carbon farming
- My organisation does policy advocacy at EU or national level in relation to carbon farming
- My organisation manages (public or private) funds that support carbon farming activities (e.g. CAP funds, national support schemes, private funds)

- My organisation does not currently have an active role in the carbon farming market
- Other (please specify)

*** Does your organisation currently invest in or plan to invest in carbon farming?**

- Yes
- No, but we plan to within 2 years
- No, and we have no current plans to do so
- Not applicable

How would you describe your current level of understanding of the CRCF Regulation?

- 1 = *Very limited understanding*
- 2 = *Basic awareness*
- 3 = *Moderate understanding*
- 4 = *Good understanding*
- 5 = *Expert-level knowledge*

The Carbon Removals and Carbon Farming Framework (CRCF) is the EU voluntary certification scheme for high-quality carbon removals and carbon farming activities. [Link to CRCF page](#)

Do you see CRCF as relevant for the carbon farming activities of your organisation?

Please rate from 1 (not at all) to 10 (very strongly)

[OPTIONAL] Please explain your rating on carbon farming relevance for your organisation.

Our organisation currently focuses primarily on permanent carbon removals. However, carbon farming is also relevant to our work, particularly regarding biochar. As methodologies evolve, biochar could play an important role in bridging permanent carbon removal and sustainable land management objectives.

BARRIERS & MOTIVATIONS

In your opinion, what are the main obstacles (or risks) undermining investment in carbon farming?

Select the top 3 obstacles.

Maximum 3 selection(s)

- No obstacle
- Lack of supply / limited availability of certified projects
- Uncertainty around credit quality and environmental integrity (MRV robustness)
- Regulatory uncertainty (claims, accounting rules)

- High transaction costs
- Lack of internal expertise to assess projects
- Greenwashing risk / reputational concerns
- Unclear or uncertain pricing (price volatility)
- Insufficient management / board buy-in
- No perceived strategic value / ROI
- Contracting complexity and legal risk
- Delivery risks (Non-delivery, under delivery, counterparty default)
- Permanence risk (reversal of stored carbon)
- Other (please specify)
- Not applicable

In your opinion, what would most increase confidence to invest in carbon farming?

Select the top 3 answers.

Maximum 3 selection(s)

- A robust and credible EU certification standard (CRCF)
- Price transparency and market benchmarks
- Standardised contractual frameworks
- Public co-financing
- Risk-sharing mechanisms and clear rules on liability
- A curated pipeline of verified projects
- Peer learning and collective purchasing
- Clear guidance on claims and communications
- Other (please specify)
- Not applicable

ACTIVITIES OF THE EU BUYERS' CLUB

Please rate the following types of support that the Commission could provide to the Buyers' Club.

The EU Buyers Club would be a coalition that aims to catalyse and aggregate voluntary public and private sector participation. It would be open to companies, organisations, public authorities and financial institutions of all types and sizes.

This section of the survey focuses on the type of coordination support that the Commission could provide to the EU Buyers' Club.

	Not important	Important but should not be provided by the Commission	Important and should be provided by the Commission	Very important and should be provided by the Commission
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Aggregation of Club members / buyers demand	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Definition of a collective purchasing strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Match-making between project developers and buyers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Provision of contract templates for buyers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Guidance on uses of CRCF units	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Monitoring of progress and reporting of projects after contracting	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Knowledge sharing activities, including production and dissemination of market intelligence and guidance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What type of purchasing contracts should the EU Buyers' Club prioritise?

Rank the following purchasing contracts.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ Offtake agreements (long-term supply contracts)

⋮ Pre-purchase / prepayment contracts (immediate payment, future delivery)

⋮ Spot purchases (immediate delivery)

⋮ Option contracts (right to purchase at a set price)

⋮ Other (please specify)

[OPTIONAL] Please specify what other purchasing contracts the EU Buyers' Club could prioritise.

The EU Buyers Club should prioritise long-term offtake agreements, as these are essential for creating market certainty and enabling investment decisions. By providing predictable long-term demand signals, such agreements can help de-risk projects, unlock private capital, and accelerate the scale-up of high-quality carbon removal solutions across Europe.

What post-selection monitoring and reporting support should the EU Commission provide to the EU Buyers' Club?

This relates to maintaining transparency once contracts have been signed.

- Annual delivery and performance reports per project
- Aggregated portfolio performance dashboard
- Alert mechanisms in case of delivery issues or reversal events
- Access to third-party MRV audit results
- Other (please specify)

Should the EU Buyers' Club have an explicit collective ambition level?

An ambition level could help signal market demand and attract project developers.

- No explicit ambition target
- A volume target (expressed in ktCO₂e or MtCO₂e)
- A capital deployment target (expressed in €)
- A project pipeline target (number of projects supported)
- A portfolio diversification target

What order of magnitude would be appropriate for this target?

- Exploratory scale (e.g. thousands of tCO₂e)
- Market-formative scale (e.g. millions of tCO₂e)
- System-shaping scale (e.g. hundreds of millions of tCO₂e)

What form should demand commitment take for Club members?

This determines the level of financial and contractual engagement expected from buyers.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

<input type="checkbox"/> Non-binding expression of interest
<input type="checkbox"/> Binding volume commitments
<input type="checkbox"/> Binding budget commitments
<input type="checkbox"/> Other (please specify)

[OPTIONAL] Please specify what other form should demand commitment take for Club members.

At this stage, non-binding expressions of interest should be prioritised. As the key objective is to attract a broader pool of buyers, participation should remain accessible and the initial commitment threshold should be kept low. A flexible entry point will help lower barriers to engagement, encourage market participation, and support the gradual development of stronger long-term commitments over time.

What sort of knowledge-sharing should be encouraged amongst the Buyers' Club members?

Select all that are valuable.

- Price benchmarks and market trends
- Pipeline of CRCF-certified projects (supply overview)
- Best practices for carbon credit claims and communications
- Case studies and buyer experience sharing
- Regulatory updates (CRCF developments, EU taxonomy, corporate reporting)
- MRV and monitoring methodologies
- Carbon market international comparisons
- Other (please specify)

ACTIVITIES OF THE EU CRCF PURCHASING FACILITY

Please rate the following functions that an EU CRCF Purchasing Facility could carry out to support the Buyers' Club and to scale-up the CRCF market.

The Purchasing Facility would be a Commission-led initiative to support the Buyers' Club with more tangible support going beyond coordination, with the aim to maximise the leverage of public resources with a public-private market infrastructure. The Facility would be set up to support Member States in cost-effectively achieving their climate targets.

This section of the survey focuses on the administrative and financial support that the Purchasing Facility could provide to scale-up the EU CRCF market.

	Not important	Important but should not be provided by the Commission	Important and should be provided by the Commission	Very important and should be provided by the Commission
Administrative support to procure carbon credits on behalf of the Buyers' Club (e.g, defining a project assessment grid, launching calls for proposals, selecting project developers, supporting contracting).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative support for carbon farming finance within the value chain for scope-3 reporting purposes (e.g., launching calls for proposals to bring together actors that share	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

a supply chain in a specific landscape or region, selecting projects, supporting contracting)				
Financial support with EU or national public funding (e.g. risk sharing mechanisms, subsidies, guarantees)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support to project developers (helping them achieve economic viability, quality)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If the Purchasing Facility organises calls for proposals, what criteria should it use to select projects?

Select the top 3 answers

Maximum 3 selection(s)

- Quality and environmental integrity of projects
- Commercial terms (price, volume, delivery timeline)
- Financial viability of project developers
- First-come, first-served approach
- Geographic diversity
- Innovation / technological novelty
- Other (please specify)

If the Purchasing Facility organises calls for proposals, how should these be structured?

Select all approaches that seem appropriate.

- Separate rounds for nature-based vs. technology-based projects
- Separate rounds for carbon removal vs. emission reduction projects
- Portfolio-based approach (bundling different project types)
- Open / continuous purchasing window (no defined rounds)
- Other (please specify)

Public financial support: Which risk-sharing mechanisms should the Purchasing Facility offer?

Rank the following instruments by order of preference.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ **Price subsidy** (the Purchasing Facility pays a fixed premium or covers part of the price gap to make projects viable)

⋮ **First-loss guarantee** (the Purchasing Facility partially compensates buyers if credits are not delivered at contract execution)

⋮ **Purchase option / buyback mechanism** (the Purchasing Facility offers to buy back credits buyers ultimately do not want on long-term contracts)

⋮ **Buffer pool / replacement guarantee** (if a project fails to deliver, the Purchasing Facility compensates with equivalent replacement credits)

⋮ Other (please specify)

[OPTIONAL] Please specify what other risk-sharing mechanisms the Purchasing Facility should offer.

The Purchasing Facility should offer a combination of risk-sharing mechanisms, as different instruments address distinct market barriers and investment needs. Price subsidies can play an important role in closing the current cost gap and improving the competitiveness of carbon removal solutions, particularly during the early stages of market development. First-loss guarantees and buy-back mechanisms are equally important, as they directly reduce downside risk for investors and project developers, helping to unlock financing, de-risk projects, and accelerate deployment at scale. A buffer pool could provide an additional layer of security by managing delivery and performance risks, thereby strengthening buyer confidence and enhancing market integrity. Overall, a blended and flexible approach would be most effective in supporting diverse market participants and maximising participation across the value chain.

What type of support should the Purchasing Facility provide to project developers?

Select the top 3 answers.

Maximum 3 selection(s)

- Technical assistance (MRV guidance, methodology support)
- Capacity building (training, peer learning networks)
- Financial bridging (advance payments, upfront capital)
- Market access facilitation (matchmaking with buyers)
- Certification support (CRCF application guidance)
- Other (please specify)
- No support needed

CONCLUSION & STRATEGIC ASSESSMENT

Are there other activities or mechanisms not covered in this survey that should be considered for the design of the Buyers' Club and/or the Purchasing Facility?

In addition to the mechanisms already covered in this survey, it would be important to consider how the Buyers' Club and Purchasing Facility can be designed to evolve over time in alignment with emerging compliance markets. In particular, the future interplay between voluntary demand-pooling initiatives and potential compliance-driven demand will need to be clarified as early as possible, as this will significantly influence investment signals, eligibility criteria, and long-term market confidence. Early clarity on how credits or contracted volumes may (or may not) interface with future compliance frameworks would help reduce regulatory uncertainty and improve investment conditions.

In your view, is there a need for EU intervention to ensure a viable market for CRCF units?

This helps assess the perceived need for public intervention.

- No – the market will develop on its own without EU support
- Partially – some targeted EU support could accelerate, but is not strictly necessary
- Yes – EU support is essential to develop the CRCF market
- I don't have a strong view

What type of EU support is needed to scale up the EU carbon farming market?

- EU support is not necessary
- EU support is necessary, but an EU Buyers' Club or a CRCF Purchasing Facility are not the right instrument
- EU support is necessary, and an EU Buyers' Club alone is sufficient
- EU support is necessary, and an EU Buyers' Club needs to be complemented by a Purchasing Facility
- I don't know

[OPTIONAL] Please provide additional context about your position on the EU support needed to scale up the EU carbon farming market.

Do you have any other comments, recommendations, or concerns?

Different buyers are likely to have varying priorities with respect to permanent carbon removals versus carbon farming, as well as differing preferences across project types and methodologies. This should be reflected in the design and structure of the Buyers' Club to ensure it can accommodate diverse demand profiles and procurement strategies. In the context of carbon farming, it is also important to carefully assess potential system-wide impacts, in particular regarding the availability and allocation of biomass for European industries and the energy system. Where possible, preference should be given to project categories that deliver high-quality climate benefits while also contributing to the competitiveness and resilience of European businesses.

Would you be willing to be contacted for a follow-up interview, or future stakeholder engagement activities?

- Yes
- No

Please provide your email address.

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