WWF PRIORITIES FOR THE EU CARBON REMOVAL CERTIFICATION FRAMEWORK

Increasing Carbon Dioxide Removal from the atmosphere is an essential part of the global fight to limit temperature rise to 1.5°C and stop runaway climate change. In this context the European Commission’s proposal for a Carbon Removal Certification Framework (CRCF) could potentially be a useful instrument and set a good example internationally.

Unfortunately, the current proposal falls short. It fails to define important concepts, leaving most of the details to be established by the Commission later through delegated acts. It also fails to specify how these certificates might be used, nor does it establish robust safeguards to avoid undermining climate action and harmful impacts on nature and avoid potential greenwashing. We highlight below the top priorities that the Parliament and Council should address in order to make the CRCF fit for purpose.

CARBON REMOVALS ARE NO ALTERNATIVE TO STEEP EMISSIONS CUTS

According to the Intergovernmental Panel on Climate Change (IPCC), carbon removals will be necessary to achieve climate neutrality. However, the potential for carbon removals will be limited compared to current emissions and so at best will only be able to compensate for low levels of hard-to-abate emissions. The CRCF should ensure that removals cannot come at the expense of very rapid emission cuts, in all sectors. Amongst other things, this means the following:

STRICT SEPARATION BETWEEN THE CRCF AND LEGAL REQUIREMENTS SUCH AS THE ETS

Removal certificates issued under the CRCF should not be used by companies to avoid their obligations under ‘compliance regimes’; for example, sold under the EU’s Emissions Trading System (ETS) as an alternative to buying emissions allowances for fossil fuel emissions that will remain in the atmosphere for centuries. Allowing this would pose a serious risk of reducing pressure on companies to cut their own emissions and hence undermine the integrity of EU climate action.
CRCF CERTIFICATES MUST NOT BE USED BY COMPANIES FOR CLIMATE-NEUTRALITY CLAIMS

Allowing companies to claim that they have ‘offset’ or compensated for their emissions with removals risks ‘greenwashing’, reduces pressure on companies to cut emissions and so also undermines climate action. Therefore, removals certified under the CRCF should not be used by companies to substantiate any claims as to climate or carbon neutrality.

TREAT LAND-BASED REMOVALS DIFFERENTLY FROM TECHNOLOGICAL REMOVALS

Land-based removal activities, also called ‘carbon farming’ in the CRCF, cover a large (and as yet unspecified) variety of nature restoration, farming and forestry practices designed to increase carbon stocks in agricultural soils, forests and other landscapes. Such activities are critical to EU climate action, and must be supported. But the CRCF must acknowledge the inherent differences between these land-based removals and permanent (e.g. geological) technological removal activities, and treat them separately.

Given the risks of reversibility associated with land-based removal activities (for example due to natural disasters or changes in land management) and the complexity, inaccuracy and prohibitive administrative cost and burden of quantifying the amount of carbon that is actually removed, such activities cannot be treated tonne-for-tonne as an equivalent currency to fossil CO2 or non-CO2 emissions. CRCF certification should instead provide a basis for access to centralised, activity-based finance (with strong monitoring systems), for example under the CAP or funds contributed to by private companies.

EXCLUDE CARBON STORAGE IN PRODUCTS FROM THE CRCF

Storage of biogenic (i.e.sequestered from the atmosphere during biomass growth) carbon in products is one of the three categories of removal activities proposed under the CRCF. In the absence of a clear definition, carbon storage could encompass a wide range of products.

Biogenic carbon can be stored in short-lived products such as paper but also long-lived products such as construction wood. Short-lived products will ultimately be burnt or end up in landfill, releasing the carbon stored, and should therefore not be considered as a permanent removal solution.

Even in the case of long-lived products, for example the use of timber in buildings instead of steel or concrete, the Commission states: “As indicated in recent scientific studies, until 2050, the potential additional benefits from harvested wood products and material substitution are unlikely to compensate for the reduction of the net forest sink associated with the increased harvesting”.

Including carbon storage in products as a form of carbon removal is therefore undesirable on climate grounds, and also due to the large variability in permanence and the fact that market participants have no formal control over the lifespan of products. On this basis, carbon storage in products should be excluded of carbon removals under the CRCF.

THE CRCF MUST SUPPORT ENVIRONMENTAL AND SOCIAL GOALS

While carbon removals are urgently needed to tackle the climate crisis and in the longer term reach climate neutrality (and then net negative emissions), we also face an unfolding biodiversity catastrophe. Environmental sustainability must therefore also be at the heart of the CRCF. Any activity certified under this framework must meet the requirements of the Do No Significant Harm principle and guarantee positive impacts on the environment and biodiversity, to ensure that only practices which both remove carbon from the atmosphere and contribute to improving the integrity of ecosystems be supported.
Furthermore, the CRCF must contribute to a just transition of the land use sector in the EU, for example by reorienting some CAP funding (currently a third of the EU budget) to climate and nature-friendly farming and forestry practices, and by protecting land rights and local communities - in order to avoid harmful social effects such as land speculation and land grabbing. In this context, care should be taken to ensure that certification is accessible to small operators and does not give undue economic or other advantages to large industry players.