

Email to: [A6.4mechanism-info@unfccc.int](mailto:A6.4mechanism-info@unfccc.int)  
Title: Further input - Removal activities under the Article 6.4 mechanism  
Date: August 1, 2023  
Subject: Structured Public Consultation - Removal Activities

Dear Article 6.4 Supervisory Body,

Thank you for [seeking additional inputs regarding removal activities](#) under the Article 6.4 mechanism. As stated in our June 19, 2023 response to the Supervisory Body (SB), we appreciate the opportunity to provide a perspective from the direct air capture ecosystem to address the [questions for structured call for inputs on recommendations for activities involving removals](#).

The [Direct Air Capture Coalition](#) (DAC Coalition) is a non-profit organization consisting of over ninety companies, civil society groups, and research and academic institutions working together to help advance and accelerate the responsible development and deployment of direct air capture technology to address climate change. In the process of writing this response, we have solicited the feedback of stakeholders and experts within the DAC Coalition.

## 2.1. Monitoring and reporting

In order to ensure integrity and durability of removals, the DAC Coalition supports regular reporting following activity implementation as well as the crediting period and post-crediting period, and reporting intervals and content should reflect the durability of removal. As an emerging technology, we recognize the need for close monitoring during and after activity implementation and, as stated in our June 19 response, DAC companies are working to develop transparent monitoring and accounting methodologies.<sup>1</sup> Initially, while DAC processes evolve and accounting methodologies become established, we expect reporting to take place frequently (for example, within two years of activity implementation and for at least biennially during the crediting period). In turn, we expect monitoring plans for DAC removal to be updated frequently during this time.

We are supportive of this transparency as necessary to drive integrity of removals and prove out DAC as a reliable and scalable method for removals. However, we are sensitive that overly frequent or complicated reporting may unduly burden startups, which must devote their limited resources to scaling removal solutions to meet Paris Agreement climate goals. To avoid this, reporting parameters, metrics and cadence should be established in close collaboration with removal companies.

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<sup>1</sup> For example, DAC Coalition member Climeworks has partnered with Carbfix and assurance provider DNV to develop the world's first full-chain methodology dedicated to removal via direct air capture and underground mineralization storage. <https://climeworks.com/news/climeworks-achievedvalidationfromdnv>

As stated in our June 19 response, as DAC storage can be in geological reservoirs, thousands of meters below the earth's surface or in the formation of permanent materials, e.g., minerals and products, DAC is poised to be the global standard-setter for permanent carbon dioxide removal. Therefore, in the medium to long term, once DAC processes and accounting becomes recognized as state of the art for removals the need for regular reporting diminishes. Instead, we support development of a removal assurance framework on which DAC companies and their offtake partners can rely to maintain carbon market integrity.

## 2.2. Addressing reversals

As stated in our June 19 response, as an engineered and industrial approach to removals, DAC provides minimal to no risk of reversals. Even at this early stage of development, DAC has a track record of no reversals.<sup>2</sup> Because the use of buffer pools for DAC significantly increases capital requirements by requiring DAC operators to hold credits in reserve, this will hinder the growth of the DAC industry as a whole. Given the minimal risk of reversal, we recommend DAC removals require lower or no risk buffers.

In fact, the durability of DAC removal makes it an ideal candidate to be leveraged as a reversal risk tool. Companies seeking to purchase nature-based removals for business or marketing reasons, or to satisfy UN Sustainable Development Goals, can buy DAC-based buffer pools, removal options, or reversal insurance to hedge against reversal risk. We encourage the SB to consider developing criteria on which removals can be assessed for quality and fit-for-purpose products for buffer pools and reversals insurance.

We appreciate your focus on the key issues surrounding removals and look forward to continued dialogue.

Best,

Jason Hochman  
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Direct Air Capture Coalition, Inc.

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<sup>2</sup> For example, carbon capture and storage projects such as the Sleipner project in Norway and the Archer Daniels Midland project in the state of Illinois in the United States, have collectively injected millions of tonnes of CO<sub>2</sub> into rock without ever experiencing a resurfacing of CO<sub>2</sub> to the atmosphere. See <https://www.equinor.com/news/archive/2019-06-12-sleipner-co2-storage-data>; <https://www.adm.com/en-us/standalone-pages/adm-and-carbon-capture-and-storage/>