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Direct Air Capture Coalition, Inc.
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Assistant Secretary Brad Crabtree
US Department of Energy
Office of Fossil Energy and Carbon Management
Email: responsiblecarbonmanagementinitiative@hq.doe.gov

Re: Response to Request for Information (RFI) regarding draft Principles for Responsible Carbon Management Projects and the Responsible Carbon Management Initiative (DOE-HQ-2023-0054; [88 FR 54608](#))

Dear Assistant Secretary Crabtree,

Thank you for the opportunity to respond to the U.S. Department of Energy's (DOE) Office of Fossil Energy and Carbon Management (FECM) RFI seeking public input on its [draft Principles for Responsible Carbon Management Projects \(the "Principles"\) and the Responsible Carbon Management Initiative \(the "Initiative"\)](#). The Direct Air Capture (DAC) Coalition is a non-profit organization consisting of over one hundred companies, non-governmental organizations and academic institutions in the DAC ecosystem spanning the globe.

1. Would the Initiative and the Principles be likely to meaningfully advance responsible carbon management? If not, what changes could be made to better advance this goal?

Yes, the DAC Coalition believes that the Initiative, supported by the Principles, would meaningfully advance responsible carbon management. The Initiative and the Principles underscore a critical shift in how society and government internalize the externalities caused by carbon emissions. Accounting for the true cost of carbon emissions requires a holistic approach taking into account not only the capture and sequestration, or utilization, of carbon oxides, but, as stated by FECM, also taking into account safety, environmental stewardship, accountability, community engagement, and societal benefits carbon management must entail.

2. At a high level, do the Principles address what is needed for responsible carbon management? If not, what additional principles may be needed?

Generally, the Principles cover many of the short- and long-term impacts to communities and ecosystems where carbon management projects are sited, in addition to establishing requirements for accounting for the carbon oxide captured and sequestered or utilized. The DAC Coalition

strongly supports this comprehensive approach, leveraging both quantitative metrics, such as greenhouse gas captured or jobs created, as well as qualitative indicia of high levels of community engagement and sensitivity to environmental justice.

In addition, FECM should consider adding a principle addressing innovation and creative approaches to carbon management. This can be both in the form of technological innovation, as well as innovative approaches to community engagement and project transparency. The DAC Coalition is proud to include many companies taking innovative approaches to capturing carbon dioxide from the ambient air, and their efforts should be recognized.

Overall, FECM should consider the direct or indirect relationship between the Principles and similar federal initiatives, such as the Environmental Protection Agency's [Environmental Justice Grants](#). In addition, FECM should consider how to clearly distinguish the Initiative from existing DOE Carbon Capture, Utilization, and Storage (CCUS) research and development programs. This is particularly important given public misperception and conflation of CCUS, as a method of enhancing oil and gas extraction, with DAC and other methods of carbon removal and durable storage.

Finally the Principles should take into consideration relevant international standards such as the United Nations Sustainable Development Goals. This will help project applicants better communicate their adherence to the Principles through shared taxonomy.

- 3. In what ways, if any, could the Principles be revised to better reflect responsible carbon management?*

While the Principles are comprehensive, they could be organized thematically to facilitate a uniform approach to intake submissions. For example, the principle of *Transparency* is inclusive of *Community Engagement* which is in turn inclusive of *Tribal Consultation*, and the principle of *Environmental Responsibility* is inclusive of *Air and Water Quality*. FECM should provide a framework, as applicable, for how the Principles are to be satisfied. Also, the application of the Principles should be proportionate to scale and scope of each project. Finally, FECM should consider providing examples of best practices for adherence to each principle.

- 4. Once finalized, would you agree to pledge to abide by or endorse the Principles? If not, what changes could be made to Phase 1 to encourage you to pledge to abide by or endorse the Principles?*

Yes, the DAC Coalition is broadly supportive of both the Initiative and the Principles and would consider endorsing the Principles when published. Further, the DAC Coalition would assist our

members and partners with adherence to the Principles when engaging with the Initiative as a best practice when siting locations for DAC facilities.

In particular, the DAC Coalition is firmly supportive of the belief that “when deployed responsibly, carbon management is complementary to, and not a replacement for, expanded and parallel efforts to reduce emissions through energy efficiency, renewable, nuclear power, clean hydrogen, and other clean energy technologies and measures.”

Notwithstanding the DAC Coalition’s support of the Principles, we believe FECM should incorporate more flexibility in Phase 1 to account for the varying scope, scale, technology and operational settings of each project and should review the state of art periodically to make adjustments to Phase 1 criteria as necessary.

Generally, the DAC Coalition is highly supportive of transparency and has demonstrated this in efforts such as our publicly available database of DAC-related reports and news. We are supportive of the view that applicants must provide high-level information on the functionality and safety of carbon removal technology and processes to best align projects with the Principles. That said, most DAC companies are in a start-up phase with limited resources, and we caution that FECM should not impose a high burden on project applicants to provide information on the intake forms.

In addition, due to the evolving nature of DAC, and need for DAC companies to maintain certain proprietary information to be competitive, FECM should distinguish which information will be made public and which will be held in confidence. FECM can work with stakeholders to ensure proper information exchange and sufficient transparency to achieve trust and maximize cooperation.

5. How could Phase 2 and a recognition program be structured and executed to maximize adoption of the Principles?

First, FECM must encourage applicants to the Initiative to establish local and community partnerships and provide examples of successful community campaigns and templates for providing information to stakeholders. In addition, FECM should work with the DOE Office of Clean Energy Demonstrations to ensure coordination on project recognition and selection.

6. Would the technical assistance envisioned in Phase 2 be helpful to advance responsible carbon management projects? Would you take advantage of this service or encourage others to take advantage? If not, why not?

Yes, technical assistance will be helpful to advance responsible carbon management projects. The DAC Coalition envisions three kinds of technical assistance being helpful for making the Initiative a success: 1) initial fact gathering and broad-based assessment of potential community and environmental justice concerns and opportunities, 2) assisting with community engagement tools and techniques, and 3) deploying public education campaigns complimentary to the siting of carbon management projects. Companies within the DAC Coalition seek to site projects in a diverse array of communities and localities, and, as stated above, due to the small size of these companies, many may not have the resources to perform community engagement for maximum adherence to the Principles. FECM can help augment these efforts by identifying types of stakeholders with whom to engage, as well as serving as a bridge to these stakeholders with educational resources on how society must better manage carbon in order to confront climate change. We recommend DOE allocate funding for providing this assistance.

We welcome further dialogue and look forward to hearing from you on how the DAC Coalition can help structure enduring principles for better carbon management.

Yours,

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