



European Commission Proposal for a Regulation of the European
Parliament and of the Council establishing a
**Union certification framework for
carbon removals**
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Position Paper

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The Commission proposes to establish a regulation for a credible and transparent framework concerning the certification of high-quality carbon removals, to foster the achievement of the goals set forth with the European Green Deal. The **Austrian Federal Economic Chamber** firmly supports the target of climate neutrality of the European Union by 2050. The **current proposal** concerning a Union certification framework for carbon removals aims at **enhancing the quantification, monitoring and reporting, verification (MRV) of carbon removals**. To achieve the 2050 target of climate neutrality - besides reducing the total amount of carbon emissions - it is essential to **remove** those **carbon emissions** from the atmosphere, that cannot further be reduced as emissions per se. In setting out rules for an independent verification and for the recognition of certification schemes for carbon removals, the present proposal for a regulation is an important step towards carbon removals and climate neutrality.

However, there are certain points, that need to be **criticised**. We would especially like to highlight the following:

- **Most importantly** and in the first place, the **scope** of the present proposal ([Art 1](#)) has to be criticised, especially when it comes to the missing **accountability of the certificates** within the framework of the present proposal to the EU ETS.
 - The EU ETS is an effective steering tool and with its market-based structure it poses positive incentives concerning CO₂ reduction. Hence, it is important to also **consider the EU ETS in the present proposal**.
- In the proposal, **only Direct Air Capture CO₂** is in the scope by the definitions ([Art 2 lit g](#)). However, CO₂ which is directly captured at the point of origin, is not included.
 - Especially when considering the aim of the present proposal - which is the reduction of carbon emissions in general - **any measure that supports CO₂ reduction should be fostered** and considered in the present proposal. Hence, also CO₂, which is directly captured at the point of origin, needs to be included in the scope - not only due to logical reasoning, but also to motivate companies to directly mitigate their emissions
- Moreover, concerning **definitions** there is little **specification** concerning “carbon storage in products” ([Art 2 lit i](#)).
 - It has to be **clarified** what is meant by “**long-lasting products and materials**” ([Art 2 lit i](#)) and that these products, where the CO₂ should not be released into the atmosphere, are recognised and also lead to a **carbon removal certificate**.
- **Additionality** is another criterion for the certification regime ([Art 5](#)).
 - It has to be considered, however, that additionality has **no place in a robust accounting system such as the EU ETS**. Certificates out of the EU ETS

should therefore be exempted from the criterion of additionality.

Finally, it should be emphasized that it is of utmost importance to secure the **accountability of the certificates concerning carbon removals to the EU ETS**. Furthermore, it is essential that **emissions that are directly captured at the point of origin** also fall under the scope of the regulation, thus providing companies with an additional incentive.



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