OPEN LETTER ON BIOCHAR CARBON REMOVAL IN THE CRCF

We represent a group of organisations from across industry, civil society, and research that have engaged in extensive discussions on how biochar carbon removal should be recognised within the Regulation on Carbon Removals and Carbon Farming (CRCF) as a permanent carbon removal method. While our perspectives differ, we have worked together to identify a compromise proposal that we believe offers a balanced and credible pathway for integrating biochar as a permanent carbon removal method. Biochar has unique characteristics compared to other approaches, and requires tailored rules that uphold the permanence and liability principles of the CCS Directive while adapting them to its specific realities.

This proposal reflects shared ground between our organisations and is intended as a constructive contribution to the Commission's delegated act process, helping to resolve outstanding issues and support a methodology that builds confidence in the market.

Our suggested approach aims to provide:

- **Conservative quantification**, ensuring only the stable fraction of biochar is credited.
- **Buffer arrangements** (set initially at 7% of units, as a conservative starting point), which would remain in place until superseded by the most recent Commission-endorsed technical reference. We suggest that the European Commission mandate the Joint Research Centre (JRC) to carry out scientific reviews of buffer adequacy at least every three years, drawing on neutral and peer-reviewed evidence and coordinating research into uncertainties such as the risk of reversal under surface conditions, the fate of biochar in agricultural soils, and the use of tracers or isotopic marking. On this basis, the Commission could endorse updated technical references, either through Implementing Decisions for JRC assessments or through citation of CEN standards in the Official Journal, so that buffer requirements are maintained, reduced, or increased in line with scientific evidence, without the need to reopen the delegated act.
- **Rules for different applications**, including clear treatment of soils and construction materials with conservative end-of-life assumptions where needed.
- **Sustainable biomass sourcing, with transparency requirements**, ensuring that biochar expansion does not undermine ecosystems, biodiversity, or wider sustainability goals.
- **Use of existing safeguards** that already ensure integrity, while encouraging additional targeted research to address remaining uncertainties around reversal risks. We suggest that this research be coordinated by the JRC in cooperation with registries and scientific institutions.

We see this proposal as a constructive step forward and an example of how Europe can work together across industry, entrepreneurs, innovators, researchers, and civil society to scale permanent carbon removal responsibly. We encourage the European Commission to continue in this spirit as it finalises the delegated act, ensuring that biochar is recognised as part of Europe's climate neutrality strategy, while maintaining safeguards that protect environmental integrity and public trust.

This compromise proposal has been developed collaboratively with the following organisations: Carbon Gap, Zero Emissions Platform, Bellona, Biochar Europe, Stiesdal, and Pyrolysis Denmark.

carbon gap Stiesdal PYROLYSE DANMARK

BELLONA EUROPA BIOCHAR EUROPE

Note: *Several of these organisations have also submitted their own consultation responses to the CRCF delegated act. This letter reflects our shared support for the spirit and direction of this approach, while leaving space for organisations to provide additional views on issues not covered here.*

SUPPORTERS

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