



**EuLA's response to the call for evidence for an impact assessment
on the certification of carbon removals**

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EuLA, the European Lime Association, represents about 95% of the European non-captive lime production through its 23 covered Member States (companies & national associations). The European lime sector operates more than 160 plants in the EU, producing a total of more than 22 million tons of lime and dolime, providing around 9.000 jobs in Europe. Lime is an essential but often unseen ingredient which possesses many applications for downstream industries. As a vital "enabler", lime is used for steel, water treatment, pharmaceuticals, environmental protection, glass and paper industrial processes, construction and civil engineering, and agriculture.

The lime industry is considered as a hard-to-abate industrial sector, as two-thirds of the total CO₂ emissions are related to process emissions, and thus unavoidable, whatever the fuels used or the energy efficiency performance.

CCU technologies are therefore critical for the lime industry as they either enable the reduction of CO₂ emissions (e-kerosene), allow neutral industrial processes (mineralisation from flue gas or DACC to fuels or chemicals), and even permit negative emissions via (enhanced) mineralisation into building and construction materials.

For the lime industry, **natural and enhanced carbonation** is indeed critical to reaching carbon neutrality. The other natural and technology-based carbon removal solutions will also be part of the solutions. An effective CRC-M is thus essential to ensure environmental integrity and allow effective incentives for broad-scale uptake and implementation of CDR solutions.

According to EuLA, 4 key elements are needed to ensure an effective CRC-M:

- **Simplicity,**
- **Transparency,**
- **Environmental integrity and**
- **Access to CO₂ transport and storage infrastructures.**

Today's main challenge is to build trust between the different actors and ensure strong and reliable political and public support for CCS and both natural and technology-based CCU solutions, maintaining the competitiveness of European hard-to-abate industrial sectors. Critical barriers to developing CCS-CCU and, in particular, the success of an effective CRC-M, should be removed by appropriate dialogue between all actors involved. EuLA will actively contribute to this ongoing debate.

As clearly pointed out by the recent UBA study¹ *“Certification of Carbon removal”*, the two main objectives of the CRC-M should be to:

- *“Ensure carbon credits are real (physically removed from the atmosphere), measurable, additional, not resulting in leakage, not double-counted (at national and/or project level), and permanent.”*
- *“Ensure broad-scale uptake and implementation of both natural and technology-based solutions CDR solutions depending on technological potential & cost-effectiveness.”*

It’s important to note that the CRC-M should cover all industrial solutions, not only natural solutions. Indeed, at this stage, and with the high European ambition level, it’s clear that **all CDR solutions should be promoted considering their technological potential & cost-effectiveness**. Public acceptability of the CCU projects should also be addressed as several studies show that CCU is preferred over CCS.

In this context and according to EuLA, the following solutions are the most promising and can qualify as carbon removal – and thus be qualified for the carbon removal certification mechanism (CRC-M):

- Natural and enhanced carbonation, as those methods enable permanent capture of CO₂ from all origins into valuable building materials or products. It’s important to note that, on average, 33% of the amount of all process CO₂ emitted during the production of lime in Europe is captured through carbonation during use and, by using specific techniques, this could even be 40%. This carbonation mainly occurs within the first year. As this CO₂ is permanently captured, this should be considered when calculating the sector’s carbon footprint.
- Closed loop systems and circular products, even if CO₂ utilisation is of a short lifetime, but the released CO₂ is recaptured and reused.
- Bio-based CO₂ with utilisation or sequestration.
- Direct Air Capture combined with Carbon Utilisation or Sequestration.
- Carbon sequestration in soils and oceans.

The CRC-M developed should be coherent, provide legal certainty and serve the needs of three different types of actors:

- 1) private and public companies (both carbon emitters and converters) and local authorities willing to meet their EU or national regulatory requirements or their voluntary targets and claims (e.g. for offsetting, insetting in supply chains, product labelling etc.),
- 2) public or private investors,
- 3) private individuals to voluntarily compensate their carbon footprints.

¹ See : [UBA report carbon certification part1.pdf](#)

Indeed, the unique certification mechanism can be the basis for incentives at the **national and project levels** (and company). We summarised the use of CRC-M in the following table.

USES	NATIONAL	PROJECT / COMPANY
Binding requirements under CC policies	LULUCF ² , ESR ³	CORSIA ⁴ , Innovation Fund, Taxonomy
Financial incentives related to EU policies	CAP ⁵ , RED ⁶ , EPBD ⁷	
Product Environmental footprint		✓
Voluntary pledges / targets	National regulation or commitment	✓
Result-based Finance / Taxonomy		✓

Governance rules and effective, robust, and verifiable Monitoring, Reporting & Verification (MRV) rules of the CRC-M should be based on IPCC rules or existing internationally approved MRV, certification and accreditation standards.

To develop an effective CRC-M serving the needs of all actors and an appropriate concrete MRV strategy to monitor the actual carbon removal at the national and project (company) levels while avoiding double-counting, EuLA insists on those two essential quality criteria of CRC-M:

First is the **simplicity of the system**. To meet this quality criterion, **only one type of certificate for all carbon removals should be issued**, but the number of certificates could vary according to the technology support needs (for instance via different multiplier coefficients). While keeping a CRC-M as simple as possible, it needs to be ensured that the permanence of a carbon removal will be valued. Therefore, permanent and non-permanent removals should be distinguished. The system should indeed be uniform to ensure comparability and competition between the different CDR solutions (cost efficiency of technology solutions) and adaptative in case of new CDR solutions. Along the same lines, EuLA insists on the need to limit the number of KPIs to be monitored (e.g. Such as the number of certificates issued and sold by type of solutions. Potential complement by other KPIs such as a number of projects by project type, the number of projects by Member State/region).

Secondly, the **system's transparency** should be ensured with uniform Monitoring, Reporting and Verification rules being developed and recognised under the relevant climate regulations. Any new, additional CRC-M system must be in line and consistent with existing EU policies and EU ETS and Renewable Energy Directive in particular. This means that the reuse of unavoidable/fossil CO₂ from the flue gas should be recognised and incentivised under the ETS system, while reuse of atmospheric/biogenic CO₂ should be recognised and incentivised under the CRC-M. **The two systems are needed and complementary to reach the ambitious EU climate objectives.**

On the criteria to be used to select the CDR solutions to be incentivised by the EU, EuLA insists on the fact that priority support should be given for unavoidable process emissions in hard-to-abate sectors – such as the lime industry - and not as a solution to extend the use of carbon fossil uses where alternatives currently exist. The technical readiness and economic feasibility of the CDR solutions, the potential deployment at a large scale, and the duration of carbon storage are additional criteria to select and calibrate the CDR solutions to be incentivised.

² Land Use, Land-Use change and Forestry

³ Effort Sharing Regulation

⁴ Carbon Offsetting and Reduction Scheme for International Aviation

⁵ Common Agricultural Policy

⁶ Renewable Energy Directive

⁷ Energy performance of Building Directive

Furthermore, **environmental integrity** should be ensured as the removal should be real, permanent, and additional while avoiding leakage and double counting. Therefore, evidence of the project's additionality and risk management measures should be developed. The **duration** of storage and risk of reversal should also be considered, as they influence the quality of the carbon removal solution and thus the value of the certificate.

Finally, to enable effective CCS and CCU projects in all relevant industrial sectors, non-discriminatory, fair, and cost-effective access to **EU CO₂ transport & storage infrastructures**, including efficient cross-border investments and joint projects, should be ensured for all hard-to-abate industrial sectors including the lime industry.

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EuLA, the European Lime Association, represents about 95% of the European non-captive lime production through its 23 national member associations (representing around 50 companies). The European lime sector operates around 160 plants covering 436 kilns in the EU, producing a total of 27 million tons of lime and dolime and contributing around € 2,5 billion to Europe's GDP providing around 9.000 jobs in Europe. Lime is an essential but often unseen ingredient, which possesses many applications for downstream industries. As a strong "enabler", lime is used from steel to water treatment and pharmaceuticals, environmental protection, glass and paper industrial processes, in the construction and civil engineering and in agriculture.