

# The potential of the Paris Agreement Crediting Mechanism to mobilise carbon removals

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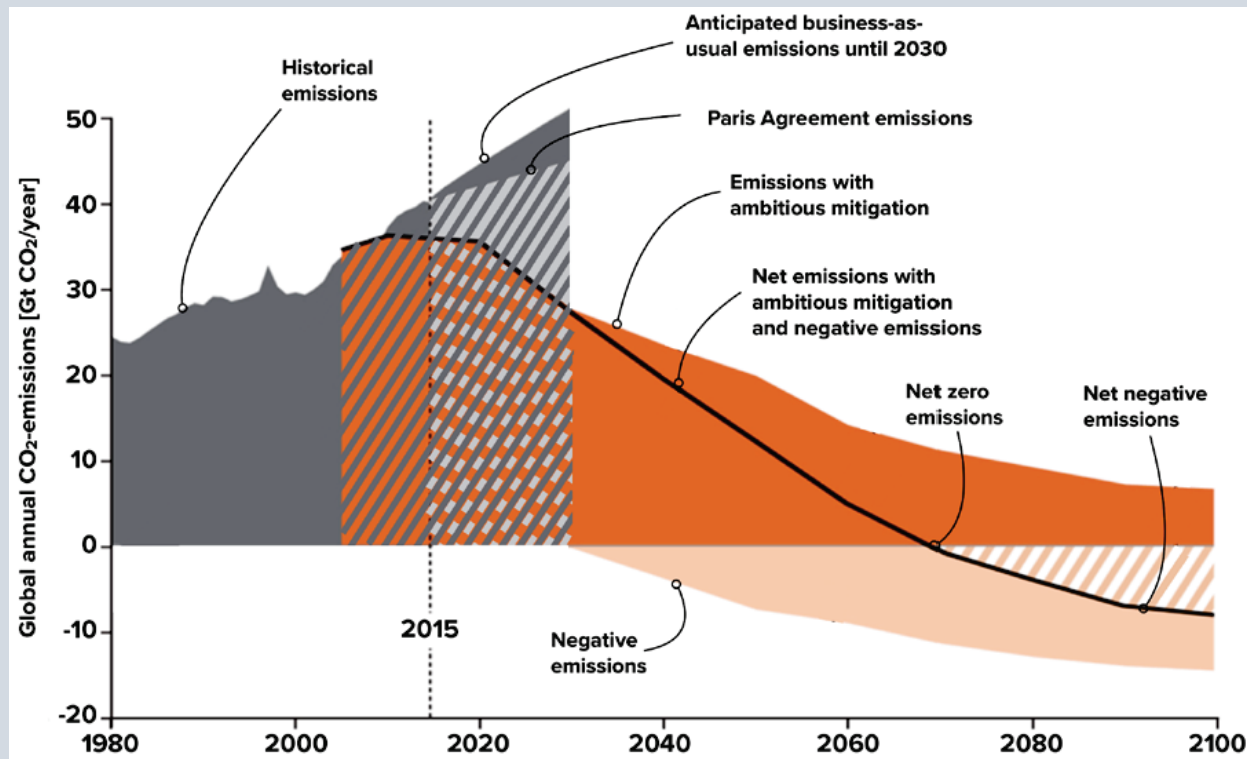
Side Event “How carbon markets can unlock high-quality carbon removals”

UNFCCC SB 62

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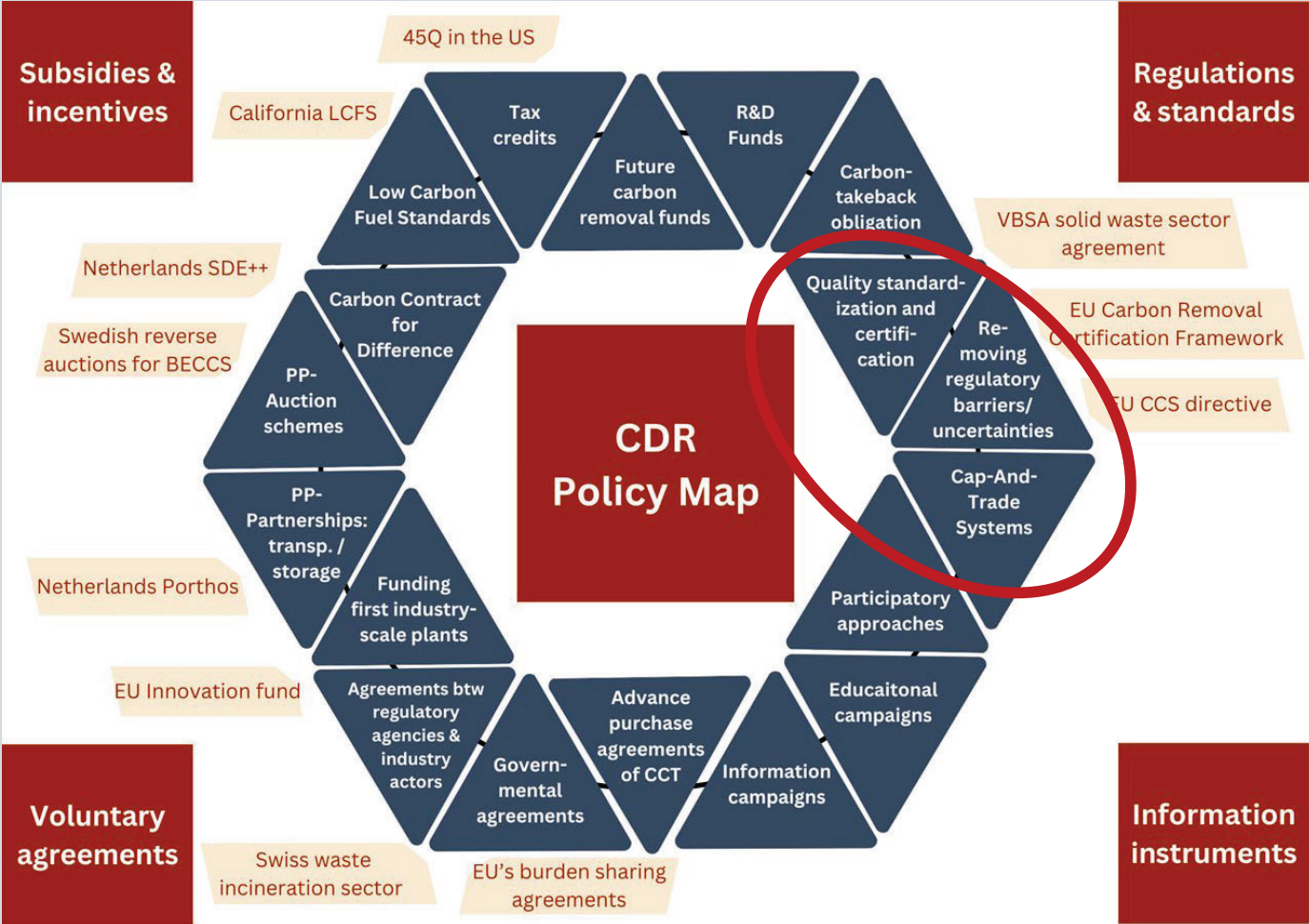
# The need for negative emissions



Source: Honegger et al., 2018

## Can carbon markets help incentivize carbon dioxide removals?

# Carbon markets are one instrument in a much larger toolbox to mobilise removals



Source: CDR  
PoET, 2025



## Tiny role of CDR in the Clean Development Mechanism

- **Only afforestation and reforestation** activities eligible
- **Reversal risk** was addressed by **temporary credits**
  - Theoretically good solution, unattractive to buyers – <1% of all CDM credits
- **Robust rules for geological storage** (CCS) came late and were never applied in practice due to the CER price crash after 2012 and general lack of CCS progress

## Article 6.4/PACM

- Removals guidance agreed at COP29 in late 2024 after three years of negotiations
- **Buffer pool** % contribution depends on the rating of the reversal risk assessment
- **Reversal** – equivalent amount of Buffer A6.4ERs cancelled – differentiation between **avoidable** (within control of developers – must reimburse buffer pool) and **unavoidable** reversals (not required to reimburse pool)
- Activity participants are asked (“should”) to obtain and maintain sufficient **insurance coverage** or comparable guarantee products to cover the risk that avoidable reversals occur – but the wording suggests this may not be mandatory

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Removals in  
UNFCCC carbon  
markets

## Article 6.2

- **Few sovereign buyers currently purchase CDR credits** due to concerns about permanence or high costs
- **Removals are a small, yet high-price niche in voluntary carbon markets**
- Currently, the market is in a **pre-financing phase**, i.e. corporates are buying future CO<sub>2</sub> removals.
- 137 CDR providers (e.g. Stockholm Exergi, Ørsted, 1PointFive)
  - However, only 30 providers making regular sales
- Only 15 buyers purchased >100,000 tonnes, Microsoft, Frontier, Google the largest buyers
- Purchased volumes: 8 MtCO<sub>2</sub> BECCS (63%), DACCS (20%), Biochar (7%)
- Actually delivered volumes: 319 KtCO<sub>2</sub> (Biochar (86%))
- ∅ Prices: 320 USD/tCO<sub>2</sub>
  - BECCS 227 USD/tCO<sub>2</sub>, DACCS 316 USD/tCO<sub>2</sub>, Biochar 165 USD/tCO<sub>2</sub>
- **Lack of regulatory oversight:** Some small crediting programmes with conflicts of interest (both issuing and trading credits)

## State of CDR in carbon markets

## Robust methodologies are crucial for high-integrity CDR

**Technical removals:** Early stage, but recent progress on developing baseline and monitoring methodologies

- Puro.Earth with largest issuance, but initially insufficient number of methodologies (e.g. Biochar, Geologically stored carbon, Carbonated materials)
- Isometric's >10 methodologies developed in <2 years, incl. e.g. Biogenic CCS, ERW, DAC, Ocean alkalinity enhancement
- CCS+ Initiative with modular approaches to most CCS-based CDR methods through Verra's VCS

**Nature-based removals:** Limited experience with CDM, but comprehensive range of methodologies across major VCM crediting programmes

**PACM should consolidate and strengthen experience generated in VCM, to emerge as high-integrity benchmark for CDR methodologies**



Voluntary carbon  
market

## Different degree of maturity of CDR methods

- **High** maturity for **biological** methods
- **Low** maturity for **(geo-)chemical** methods

## Mitigation costs vary hugely, by two orders of magnitude

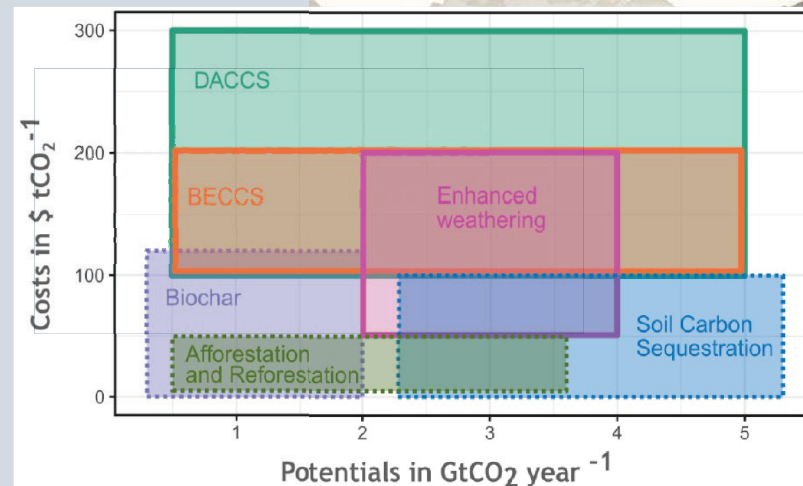
- For most methods costs are **much higher** than for emission reductions
- Only **afforestation / reforestation** can currently **compete** with emission reductions

## Reversal risks vary massively between methods

- Reversal risk generally **negatively correlated** with mitigation costs
- **Biological methods** generally have a **much higher** reversal risk than methods with geological storage (best: basaltic mineralisation)

## MRV challenging for some methods

- Methods applied on **large areas** face **high variation in MRV outcomes**
- **Positive / negative impacts on sustainable development vary widely**

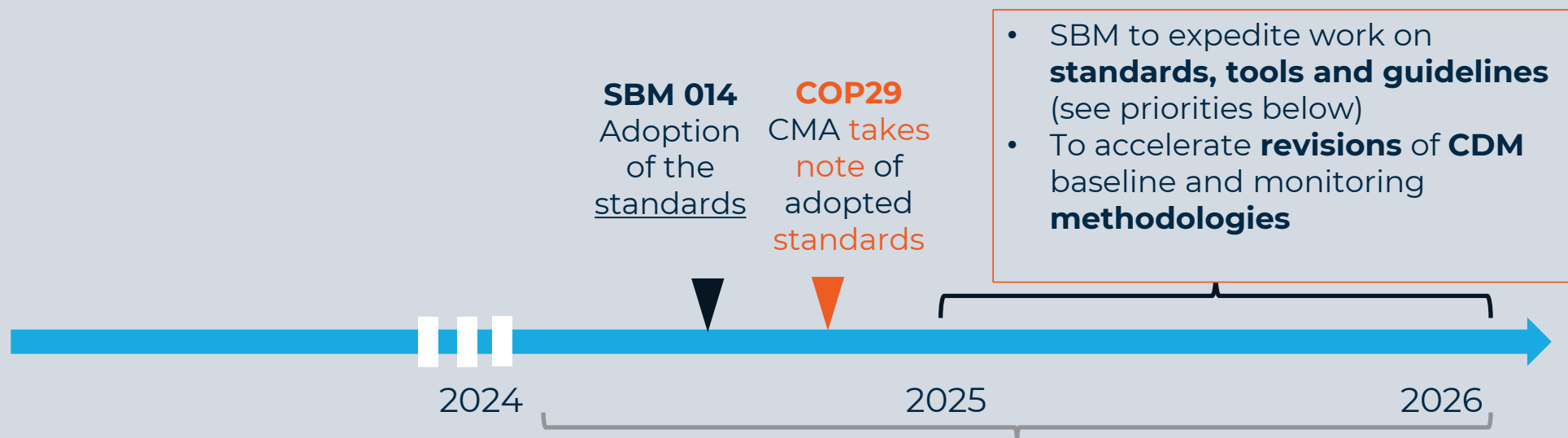


Source: IPCC 2018



# Timeline of PACM methodology development

The PA crediting mechanism is advancing its regulatory framework



- MEP **priorities**: baselines, downward adjustment, standardized baselines, suppressed demand, additionality, leakage, post-crediting period monitoring, **reversal risk assessments**
- Focus: Revision of **priority CDM meths**: energy, waste, cookstoves, rural electrification, transport

## Work related to removals under development by MEP

- **Standard** for Addressing non-permanence / reversals until SBM18
- **Tool**: Reversal-risk assessment until SBM 19
- Limited focus requires finding the right mix of **top-down (UNFCCC/govt)** and **bottom-up (private sector)** efforts for **developing removal methodologies**



# Prior consideration for A6.4 activities shows high interest in PACM

## Breakdown of PCNs submitted under Article 6.4

Carbon projects that have submitted Prior Consideration Notifications (PCNs) to the UN for trading carbon credits under Article 6.4

Region ● Americas ● Asia ● Europe ● Africa ● Oceania



Source: UNEP Copenhagen Climate Centre

Carbon Pulse

## Demand outlook: CDR not included in most compliance markets

- Existing compliance markets focus primarily on emission reductions
- EU considering integration into EU ETS; UK clear statement of intent to include removals in UK ETS
  - Carbon Removals and Carbon Farming regulation establishes emerging EU domestic crediting programme
  - New Zealand's & California's ETS include forestry
- **How will CDR demand evolve?**
- **Short term (15 years):** market establishment and expansion at limited scale due to early-stage development and open questions on integrity, liability etc.
- **Long term (2050-2070):** increasing shift of carbon markets towards removals as emission reduction credits will no longer accrue once host countries have reached their net-zero targets
- **Public finance and credit demand to catalyze the market**
- **PACM is gaining traction among sovereign buyers, but limited attention on specific certificate demand or technical assistance specifically focusing carbon removals**



## Compliance markets