

25 May 2023

Ørsted's feedback: Information note - Removal activities under the Article 6.4 mechanism

Ørsted finds it very critical that the description of BECCS removal activity based on biogenic waste (section 29-32) conclude that BECCS cannot be considered removal activity. This does not take into account the neutral carbon cycle related to BECCS based on sustainably managed forest areas. It is a widely recognised practice that bioenergy based on sustainably managed forest areas is considered renewable energy and hence applying CCS activity to bioenergy based on sustainably managed forest areas can deliver removals.

E.g. forest biomass for bioenergy is recognized by the European Union as renewable energy if it complies with a set of sustainability criteria established in the Renewable Energy Directive (Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast) (Text with EEA relevance.)). These criteria ensure that the biomass originates from sustainably managed forest areas.

This perspective is in line with the reference in section 32 to BECCS activity which can generate removals if it is based on plantation or energy crops specifically raised for the purpose of producing fuel for the power plant. In this section as well as in appendix H it recognises the potential for biomass sequestration even with continued removal of biomass. This is comparable to BECCS based on sustainably managed forest areas.

In some cases, it might even be argued, that BECCS based on sustainably managed forest areas might provide greater co-benefits than BECCS based on plantation or energy crops specifically raised for the purpose of producing fuel for the power plant. Such plantation or energy crops might take up land areas for other uses compared to sustainably managed forest areas, which are already established.

Overall, when biomass lives up to sustainability criteria such as the EU Renewable Energy Directive it is considered renewable energy and should be applicable for use for BECCS to generate removals.

Yours sincerely
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