

estimate with today's estimation methods. The use of carbon stock in living tree biomass as baseline ensures objectivity, comparability, minimizes administrative costs and works for small as well as for big landowners. A verified carbon sink in forestry should therefore be considered additional if it arises as a result of the carbon finance.

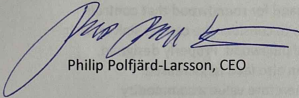
To open the door for the forestry sector to be one of the technologies to mitigate climate change there must however be flexibility and room for temporary credits of varying duration. Temporary credits enable greater landowner participation and properly designed they can be key to unlocking scale and quality. As a seller of climate compensation, we see several innovative solutions to convert temporary credits into more permanent ones. For example, one can combine five credits with a duration of 20 years so that they can offset an emission of one ton for a hundred years. Then the compensation takes place in advance and the buyer can state after 20 years that it has then fully occurred. It reduces the risk of reversal and lowers monitoring costs.

Each country has its own unique conditions to create carbon removals. It is therefore good that the EU Commission sets overall quality requirements, but the member states' experts, landowners, buyers and sellers of the climate service must design the methodology for the best function.

Absorb AB is happy to answer questions or participate in a meeting about the proposal and/or our opinion.

Sincerely,

Absorb AB



Philip Polfjård-Larsson, CEO

24/2 -23

Till
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Yttrande över remiss av EU-kommissionens förslag om certifieringsramverk för upptag och infångande av koldioxid (CRCF) (Dnr M2022/02237)

Absorb AB förmedlar klimatkompensation via svensk skog till företag som aktivt arbetar med sitt klimatavtryck och vill reducera koldioxidhalten i atmosfären, på riktigt. Absorb AB har tagit del av rubricerad remiss och avger härmed följande yttrande.

Absorb AB supports the Commission's proposal to build the carbon removal framework around the four quality criteria, as it has the potential to set clear standards for the sequestration of carbon in crops and soils. One of these criteria is the establishment of a baseline, a crucial aspect as it provides a reference point to measure the impact of carbon removal initiatives. Here it is important to distinguish between agriculture and forestry. By using a transparent and data-driven approach, a baseline for agriculture can be created that accurately reflects the emissions before the start of an emission reduction project and serves as a reliable benchmark for evaluating its effectiveness. For forestry with its long rotation cycles, another reference is needed, and we suggest that it should be the carbon store and not the carbon sink as such.

A carbon sink is anything that absorbs more carbon from the atmosphere than it releases. The carbon sink in the forest is controlled by growth and felling, which in the short and medium term means that it is the economy and the demand for roundwood that controls the size of the carbon sink. In order for the forest owners to consider the carbon sink in their forestry, it must be priced in the same way as timber and pulpwood. Properly designed, incentives that steer towards increasing timber stocks can also lead to increased opportunities to harvest in the future. Markets should therefore value a commodity regardless on the owner's motivation in possessing it. If we are trying to value carbon removal in the forest, then it should be valued as equally as possible. While one might argue about whether a specific project represents a change in landowner behavior, valuing carbon removals in the forest changes the way forests are valued and thus changes the behavior of the whole market. Forests are now being valued not just for their timber or development potential, but for the ecosystem services they provide. As the price of carbon removal certificates goes up, this will exert more and more influence over how forests are bought, sold, and managed. Isn't that what is needed? We believe the only way this will work is for forest carbon removal valuations to be as consistent and objective as possible.

Forests have long been a carbon sink without being valued but are now increasingly weakened in Europe even though it still removes carbon dioxide from the atmosphere. Therefore, the current carbon sink must first be ensured and then increased to meet the climate goals. This can happen if the market values all carbon sinks equally. The carbon stock in living tree biomass is easy to measure at the property level and should serve as baseline for carbon removal projects. Carbon stocks in dead organic matter and soils are too costly to