US Carbon management policy and markets overview

February 27, 2025 Noah Deich



Carbon management is old tech for new goals

From oil and gas:

- **1930s**: carbon capture invented for oil and gas processing
- **1970s**: geologic storage of CO₂ commercialized for oil production

To CO2 pollution control for climate mitigation:

- **1990s**: first government R&D for carbon management as climate solution, including large-scale operation of dedicated CO₂ injection in offshore geologic reservoirs
- **2000s:** IPCC special report on CCS, introduction of initial 45Q tax credits and EPA class VI regulatory framework
- **2010s:** commercial operation of demonstrations + reform of 45Q tax credits
- **2020s:** expansion of 45Q tax credits + Bipartisan Infrastructure Law funding introduction of global Carbon Management Challenge

For carbon management, the US needs to:

- Demonstrate capture on new sources
- Build infrastructure for dedicated CO2 storage

Figure 7: Example pathways to a 2050 deployment³³

	Example Pathways to a 20		
	Today	2030	2050
	Actuals	Target	Estimated range
CO ₂ capture capacity (MT/yr)	23M	~50-70M	~300-900M
Tech carbon dioxide removal capacity (MT/yr)	<.01M	~25-30M	~200-700M
Point source capture projects (# projects)	17	~30-100	~250-900
CO ₂ pipeline (miles)	5,500	~10,000-15,000	~30,000-96.000
Dedicated CO ₂ storage injection* volumes (MT/yr)	19M	~190M	~500-2,000M
Permitted Class VI storage facilities (# facilities)	~8**	~120-140	~400-1,500M
New direct jobs	~5-10K	~200-300K	~1,400-2,900K

CA can play leading

near-term role

*Indicates potential injectivity; actual injectivity contingent upon CO₂ capture

**8 projects with 18 total Class VI wells

And we also must:

• Scale carbon removal beyond point-source capture

Living biomass Biomass direct storage Timber building products Other biomass building products Pyrolysis (biochar) and storage Pyrolysis (bioliquid) and storage Microalgae cultivated in artificial ponds and stored Microalgae cultivated in open water and sunk Macroalgae cultivated in open water and sunk **BECCS to electricity BECCS to fuels** Surficial mineralization Coastal enhanced weathering Terrestrial enhanced weathering Mineral alkalinity enhancement CO₂ stripping Electrochemical alkalinity production Absorption and high-grade heat regeneration Absorption and low-grade heat regeneration Absorption and electrochemical regeneration Adsorption and high-grade heat regeneration Adsorption and low-grade heat regeneration Adsorption and electrochemical regeneration Adsorption and humidity/water regeneration Membrane: pressure gradient separation Membrane: electrochemical separation Cryogenic: phase separation (vapor-solid) Conventional storage In-situ mineralization storage Ex-situ mineralization storage

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CA has near-term opportunities in:

- Biomass
- Direct air capture
- CO₂ mineralization
- Marine CDR

The US Federal Government was leading

- Research and innovation funding
- Incentives via 45Q and for carbon removal via purchasing
- Regulations for:
 - Point sources via EPA 111d rules
 - CO2 storage via EPA Class VI Underground Injection Control Rules and Department of Interior offshore geologic CO2 storage
 - CO2 pipeline safety via Department of Transportation at PHMSA
- Finance via DOE and USDA loan guarantee programs
- International diplomacy via:
 - Carbon management Challenge
 - Mission Innovation and Clean Energy Ministerials

Higher purity sources are currently profitable but do not include sufficient emissions to achieve net zero goals



Project specific economics dependent on CO2 capture capacity, utilization, distance to storage and existing equipment

Bipartisan Infrastructure Law (BIL)

The BIL provides ~\$12 billion in funding for high-potential projects across the carbon management value chain, including funding for demonstration and pilot projects.^{Ixx} The BIL also includes \$8B for Regional Clean Hydrogen Hubs, at least one of which must prioritize projects that use CCUS to generate clean hydrogen and \$500M for Industrial Emissions Demonstration Projects that could include carbon management technologies.

- Carbon Capture Demonstration Projects Program (\$2.5B)
- Carbon Capture Large-scale Pilot Projects (\$937M)
- Carbon Capture Technology Program, Front-End Engineering and Design (\$100M)
- Carbon Dioxide Transportation Infrastructure Finance and Innovation (\$2.1B)⁴⁰
- Carbon Storage Validation and Testing (\$2.5B)
- Carbon Utilization Program (\$310M)
- Commercial Direct Air Capture Technologies Prize Competitions (\$100M)
- Precommercial Direct Air Capture Technologies Prize Competitions (\$15M)
- Regional Direct Air Capture Hubs (\$3.5B)

Compliance carbon markets provide pathwork of support

- Price signals in most compliance carbon markets insufficient to drive carbon management project development today
 - CA Low Carbon Fuel Standard is main exception (for limited eligible sources).
- National governments catalyzing carbon management development via:
 - Contracts for difference
 - Direct subsidies

Voluntary carbon markets focused on removals

- Prices paid for removals in the \$100s/tonne -- far more than most point source capture
 - Voluntary demand weaker given fears over extension of fossil fuels
- Removals prices higher than needed to unlock necessary scale of voluntary demand
- Market adoption prevented today by:
 - Lack of convergence for carbon accounting protocols
 - Lack of clear guidance for buyers on safeguards for purchases

Top opportunities for California leadership

- 1. Integrate carbon management into cap-and-trade
 - a. Provide opportunities to subsidize "lighthouse" projects via contracts for difference
- 2. Purchase carbon removal credits
 - a. Establish carbon accounting standards that can be benchmark for other governments and corporations
 - b. Use leadership to crowd in further government and voluntary purchases
- 3. Build carbon management hubs that embed community benefits and environmental protection in consistent ways for all projects

.: Frontier

A Buyer's Perspective on Carbon Removal

February 2025 | CARB Carbon Capture, Removal, Utilization, and Storage Workshop

Carbon removal is behind

< 50K tons of permanent removal *cumulatively*

~**4B tons** of permanent removal needed *annually* by 2050 (i.e., in addition to trees/soil)



Image of large brown square representing total durable removal needed vs tiny pixel representing removals to date

Source: Climate modeling: IPCC growth path for permanent CDR is estimated as the median of C1 & C2 scenarios from AR6 WG3 that have non-zero totals for permanent CDR. Categories considered permanent are enhanced weathering, BECCS/BiCRS, DAC and Other.

Supply: Many promising companies, but few tons delivered and prices remain high

- 500+ durable CDR startups
- Majority of promising companies are early stage and expensive, though average price per ton is beginning to drop
- Companies are beginning to deliver, but building & deploying quickly remains challenging
- Fewer than 50K permanent tons and 600K durable tons have been removed to date

Pricing Change | 2023 - 2024

Weighted Average Price per Tonne

Method	2023	2024	Change v
Mineralization	\$370	\$827	123%
Biochar	\$140	\$165	18%
Enhanced Weathering	\$370	\$308	-17%
Other BiCRS	\$480	\$384	-20%
BECCS	\$300	\$227	-24%
DACCS	\$692	\$316	-54%
mCDR	\$1,510	\$457	-70%

Image showing 2023 vs 2024 prices by carbon removal method. Source: cdr.fyi

Demand: Growing but not yet on-track for \$400B+



Image showing tons sold, average order size, total orders and number of buyers in 2023 vs 2024. Source: cdr.fyi

- 13M tons (\$3.5B) purchased by voluntary buyers in 2024
- Purchases are highly concentrated across a few buyers
- Policy-driven demand is coming online, but slowly

An advance market commitment to accelerate carbon removal

Frontier is an advance market commitment to buy an initial \$1B+ of permanent carbon removal between 2022 and 2030. It was founded by Stripe, Alphabet, Shopify, Meta, McKinsey and tens of thousands of businesses using Stripe Climate.





Frontier's Target Criteria: scalable, permanent CDR

Criteria	Description	
Durability	Stores carbon permanently (>1,000 years)	
Physical footprint	Takes advantage of carbon sinks less constrained by arable land	
Cost	Has a path to being affordable at scale (<\$100 per ton)	
Capacity	Has a path to being a meaningful part of the carbon removal solution portfolio (>0.5 gigatons per year)	
Net negativity	Results in a net reduction in atmospheric carbon dioxide	
Additionality	Results in net new carbon removed, rather than taking credit for removal that was already going to occur	
Verifiability	Has a path to using scientifically rigorous and transparent methods for monitoring and verification	
Safety and legality	Is working towards the highest standards of safety, compliance, and local environmental outcomes; actively mitigates risks and negative environmental and other externalities on an ongoing basis	

We use three lenses to evaluate projects

Lens 1 Target criteria

Does the carbon removal approach meet our criteria?

Lens 2 Execution

Can this team deliver on the proposal, given where the technology is today?

Lens 3 Portfolio

Does this purchase help us build a diverse, risk-adjusted portfolio of carbon removal approaches?

We purchase a diverse portfolio of approaches



Images of carbon removal materials (direct air capture systems, limestone, etc.) and deployment sites (oceans, agricultural fields, rivers)

Early buyers can accelerate responsible innovation

Early buyers "steer" in multiple ways

- Creating alignment across buyers on principles for high-quality removals
- Diligencing across multiple dimensions
- Setting a high bar for standards for carbon removal measurement, community engagement, and ecosystem safety
- Making applications & contracts publicly available to enable transparency & learning
- Delivery criteria and/or milestones within contracts to spur scientific research

As customers in a small market, early buyers can influence the broader CDR ecosystem, including suppliers, other buyers, and standard-setters

Challenge #1: Lack of incentives to purchase today

- Voluntary demand is growing, but slowly. As of 2023, only 40 buyers had purchased more than 1,000 tons of CDR.
- There are limited incentives for voluntary climate action this decade. Voluntary standards require durable CDR to meet net zero targets, but do not dictate an amount to be purchased on the path to net zero. There is limited regulatory pressure to buy durable CDR vs other solutions.
- **Purchasing is expensive, technical, and time consuming.** Durable tons are more expensive than alternatives. The average company is focused on decarbonization and lacks the dedicated legal or scientific capacity to evaluate and make purchases quickly.
- In short, current markets don't reward buying durable CDR early.

Challenge #2: Lack of established measurement standards

- The process to measure CDR from varies widely by approach. Quantifying removals from direct air capture requires different methods than for enhanced weathering.
- Each approach has tricky technical questions. Durable removal avoids some of the additionality and durability questions of traditional offsets, but there are still uncertainties associated with quantifying deliveries.
- Protocols differ, and suppliers can pick between them. There are multiple, competing organizations that issue credits, with different protocols, which means suppliers could choose the "easiest" or cheapest.



Image of a CarbonPlan's Verification Framework, a tool outlining the components to be calculated to measure net removals for each CDR approach

How does Frontier estimate that a ton has been permanently been removed?

It's a three-step process:

- **Protocol:** Prior to purchasing, Frontier's scientific team reviews the supplier's measurement approach and approves a protocol for measuring and reporting tons removed. This protocol discounts the net removal volume based on any uncertainties or reversal risks.
- **Registry & verification:** Frontier approves an independent, third party credit issuer (or registry), who works with a verifier to review the supplier's delivery data against the approved protocol and issues credits.
- **Delivery:** Frontier buyers accept the confirmed credits from the supplier.

Source: Frontier perspective <u>"Quantifying delivered carbon removal as an early buyer</u>" Fall 2022

Challenge #3: Barriers to getting projects built quickly

What are the the biggest risks to achieving your cost and volume trajectory?



Accessing financing, finding customers, and securing permits are cited by companies as top barriers to scaling quickly

Source: 2024 Frontier portfolio survey with 31 responses

Opportunities for California to accelerate the carbon removal field

To address field uncertainties and accelerate the early removals market, CARB could consider:

- Supporting a diverse portfolio of emerging carbon removal technologies, in line with California's 2022 Scoping Plan that identified a target of 7 MMT of CDR by 2030
- Signaling to the market what high quality removal looks like to de-risk purchasing
- Providing clear regulatory pathways and support throughout project permitting
- Defining clear, unified measurement standards for carbon removal approaches. This includes adopting protocols for CDR approaches that could be used consistently across programs (e.g. LCFS)

Thank you

frontierclimate.com



THE INTEGRITY COUNCIL FOR THE VOLUNTARY CARBON MARKET

CARB PERMANENCE WORKSHOP

Feb 2025



WHAT WILL HELP THE VOLUNTARY CARBON MARKET TO REACH ITS POTENTIAL?

THE CHALLENGE

The Voluntary Carbon Market lacks the consistent high-integrity it needs to achieve its full potential

Voluntary carbon markets to date have lacked a widely-accepted threshold for high-quality carbon credits. **Concerns over quality have dampened confidence**.

The market is not yet fully transparent, deep, liquid, standardized or scalable so it is **less efficient at channeling climate finance capital for maximum impact**.

Lack of shared vision and alignment across the market on the next generation of standards, rules and systems for delivering and scaling high integrity credits has hampered the race to the top.



OUR WORK



01 ASSESSMENT

We are assessing carboncrediting programs and methodology types against the Core Carbon Principles (CCPs). CCP labelled carbon credits will bring integrity to the market.



02 STAKEHOLDER ENGAGEMENT

We are engaging with all stakeholders in the market including, VCM practitioners, governments and regulators, Indigenous Peoples & local communities.



03 CONTINUOUS IMPROVEMENT

We are working to ensure carbon programs and projects increase ambition over time. Our stakeholder workshops will identify best practice in key areas to feed into the next iteration of the CCPs.



OUR GOVERNING BOARD

The Board consists of 22 Board Members with representation across all key stakeholder groups, including experts in carbon market methodologies, sustainable finance, environmental NGOs, philanthropy, UNFCCC process expertise, regulatory affairs, the corporate sector, science and academia, local communities and indigenous peoples.

Chair







Annette Nazareth

Sonja Gibbs





Michael Hugman







Elected market representatives



Mary Grady

leff Swartz





Angela Churie Kallhauge









Kelley Kizzier



Dee Lawrence







Chris Leeds



Francisco Souza

Kanyinke Sena

Chosen via vote by the Member Consultation Group, acting in their personal

Jennifer Corpuz

Indigenous Peoples and Local Communities

3 dedicated board seats for IPs & LCs (e.g. peoples from indigenous groups, rainforest nations, etc.)



Yasmine Moezinia





Alexia Kelly **Board Alternate**



Carl Wesselink



Agustin Silvani **Board Alternate**





Rod Taylor

Tracey Wong

Board Alternate



capacity



OUR 2024 INDEPENDENT EXPERT PANEL

EXPERT PANEL CO-CHAIRS



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AND SUBJECT MATTER EXPERTS

16 experts supporting the Expert Panel's evaluation of specific carbon crediting programs and classes of carbon credits with their specialist expertise.

Amr Osama Aziz

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*



OUR DISTINGUISHED ADVISORY GROUP

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Nicholas Stern Grantham Research Institute, LSE



Adair Turner **Energy Transitions Commission**



Bill Winters Standard Chartered



Ailun Yang **Bloomberg Philanthropies**







THE ICVCM ASSESSMENT AND OVERSIGHT PROCESS





ICVCM'S DOUBLE TICK PROCESS

INDEPENDENT CARBON Crediting programs Apply to icvcm THEY ARE REVIEWED TO Confirm they meet the Governance CCPS IF THEY DO, THE Governing Board Approves them as 'CCP - Eligible'



PROGRAMS CAN ISSUE CCP-LABELLED CREDITS

ALL TYPES OF CARBON CREDITING METHODS ARE Sorted into groups of Similar types

THEY ARE ASSESSED BY EXPERTS TO CHECK THEY MEET THE RELEVANT CCPS IF THEY DO, THE Governing Board Classifies them as 'CCP - Approved'



THE CORE CARBON PRINCIPLES

The CCPs set a global benchmark to ensure integrity in the voluntary carbon market.

GOVERNANCE

- 1. Effective governance
- 2. Tracking
- Transparency
- Robust independent third-party validation and verification

EMISSIONS IMPACT

- 5. Additionality
- 6. Permanence
- 7. Robust quantification of emission reductions and removals
- 8. No double counting

SUSTAINABLE DEVELOPMENT

- 9. Sustainable development benefits and safeguards
- 10. Contribution to net zero transition



CCP ATTRIBUTES

Carbon crediting programs can use attributes to highlight additional features related to the project for which the carbon credit has been issued.

This allows buyers to purchase carbon credits that match their preferences.

- **CCP Attribute 1:** Host country authorization pursuant to Article 6 of the Paris Agreement
- **CCP Attribute 2:** Share of proceeds for Adaptation (if decided)
- **CCP Attribute 3:** Quantified positive SDG impacts (under development)



MARKET BUY-IN

- Latest progress on assessments: <u>Categories</u>, <u>Programs</u>
- Recognition as key standard setter alongside: GHG Protocol, SBTi, VCMI
- Programs <u>already</u> responding to new requirements and updating program rules
- VCMI Claims Code of Practice points to ICVCM approved credits

WE ARE NOW ASSESSING CARBON CREDITING PROGRAMS REPRESENTING 98% OF THE MARKET.





CCP-ELIGIBLE PROGRAMS' MARKET SHARE

- Market share by total issuance
- Submitted methodologies by CCP-Eligible Programs account for 68.5% of the total market share



CONTINUOUS IMPROVEMENT WORK PROGRAMS: BUILDING THE FUTURE OF THE VCM



ICVCM'S PIONEERING CONTINUOUS IMPROVEMENT WORK PROGRAMS (CIWPS) OVERVIEW

The CIWPs market evolution strategy will inform a modernized, standardized, and scalable high integrity VCM 2.0



- Address areas where innovative approaches and technological advance will enable the ICVCM to build stronger, more transparent, and more robust solutions for the VCM as a whole
- Bring together leading market experts and key stakeholders in a collaborative effort to harness existing and emerging best practices to address the complex challenges and opportunities facing the market today
- Advance a "virtuous cycle" of feedback between voluntary and emerging compliance markets around the globe

Leveraging outputs to advance CCPs



- The board will consider outputs for integration into next version of CCPs
- In some instances, it will issue recommendations and findings for work that is needed to scale and modernize the market, but that the ICVCM might not implement itself



CONTINUOUS IMPROVEMENT WORK PROGRAMS: BUILDING THE FUTURE OF THE VCM



THE BOARD HAS APPROVED 13 CIWPS ON MARKET Evolution and innovation

BATCH 1

- . Paris Agreement harmonization
 - Consideration of a Share of Proceeds for Adaptation
 - Alignment of baselines with Nationally Determined Contributions
 - Corresponding Adjustments
- 2. Social Safeguards and Benefit Sharing
- 3. Permanence

BATCH 2 & 3 (SEQUENCING TBD)

Completed

 Measurement, Reporting and Verification (MRV) Systems (including DMRV)

Expected to launch Jan 2025

- 5. Market transparency, Standardization, and Scalability
- 6. Oversight of Validation and Verification Bodies (VVBs)
- 7. Simplified approaches for small projects
- 8. Jurisdictional crediting approaches
- 9. Renewable Energy Crediting Approaches (focused on Additionality)
- **10. Transition Crediting** (related to energy transition)
- 11. Permanence (continued)

ICVCM ASSESSMENT FRAMEWORK: PERMANENCE



CORE CARBON PRINCIPLE

CRITERION 9.1: CATEGORIZATION OF ACTIVITIES



The GHG emission reductions or removals from the mitigation activity shall be permanent, or, where there is a risk of reversal, there shall be measures in place to address those risks and compensate for reversals.

Material risk of reversal

- Conservation and avoided conversion
- Agriculture soil carbon sequestration
- Forestry sequestration
- Wetland and marine ecosystem restoration and management

Lower risk of reversal

- Displacement of non-renewable biomass
- Biochar
- CCS with geological storage
- Enhanced weathering
- CCS with mineralization
- CO2 in concrete utilization



CRITERION 9.2: COMPENSATION FOR REVERSALS

IC-VCM guidance allowed for two compensation options:









CRITERION 9.3: MONITORING AND COMPENSATION PERIOD

For activities with a material risk of reversal, the carbon-crediting program shall:

- Require a monitoring and compensation period of at least forty years from the start of the first crediting period
- Require project developers to monitor and report any reversals for the full monitoring and compensation period and compensate for unavoidable reversals
- Refrain from issuing further carbon credits until avoidable reversals have been compensated
- Draw upon the pooled buffer reserve if avoidable reversals are not compensated
- Treat cessation of monitoring and verification as an avoidable reversal



CRITERION 9.4: COMPENSATION MECHANISM

For activities with a material risk of reversal, the carbon-crediting program shall:

- Require estimation of reversal risk using a publicly available methodology
- Incentivize project developers to mitigate reversal risk
- Define criteria for determining whether a reversal is avoidable or unavoidable
- Implement a pooled buffer reserve:
 - Minimum of 20% of all credits issued or proportional to the reversal risk with consideration that avoidable reversals are not required to be compensated for
 - Make **publicly available the contents** of the pooled buffer reserve



CRITERION 9.5: JURISDICTIONAL REDD+ PERMANENCE

For jurisdictional REDD+ (JREDD+), the carbon-crediting program shall:

- Implement a pooled buffer reserve that is contributed to by JREDD+ actors
- Require that the percentage of credits contributed to the buffer be equivalent to the reversal risk and adequate to compensate for potential reversals for at least 40 years
- Where a reversal occurs and it exceeds a JREDD+ actor's contribution to the buffer, require the JREDD+ actor to replenish the buffer to a level equal to the reversal risk
- Require that all credits in the buffer from a JREDD+ actor be canceled if the JREDD+ actor leaves the program



CURRENT APPROACHES TO PERMANENCE ACROSS CREDITING STANDARDS (1/2)

Monitoring and compensation periods for selected carbon crediting programs (1/2)



CAMBRIDGE

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¹Agriculture, forestry and other land use; ²Carbon capture and storage; ³The REDD+ Environmental Excellence Standard

CURRENT APPROACHES TO PERMANENCE ACROSS CREDITING STANDARDS (2/2)

Monitoring and compensation periods for selected carbon crediting programs (2/2)

< 20 years 20 years 30 years 40 years 50 years 100 + years Isometric Post-injection monitoring is aligned to regulatory CO2 storage in saline aquifers requirements; 20-years in the EU and 50 years in the US Plan Vivo Risks to carbon benefits for a period of at least 50 years Clim ate standard must be identified and significant risks mitigated Puro.earth Projects must submit a long-term (defined as 100 years) risk Carbonated minerals assessment and mitigation plan associated with permanence Storage sites must be monitored "over time;" however no Terrestrial biom ass specific minimum duration is outlined Verra Minimum 40-year project duration; long-AFOLU projects term monitoring system in development Minimum post-injection monitoring Geologic carbon sequestration requirement of 10 years

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NON-EXHAUSITIVE

PERMANENCE CIWP OVERVIEW

Launched to bring together different perspectives and stakeholders in the market to drive consensus and develop a shared understanding among the expert community on:

- Consider the various approaches to addressing the issue of permanence for carbon crediting purposes
- Identify key open questions or gaps in understanding or knowledge
- Develop recommendations for addressing permanence (including risk assessment, allocation, and mitigation) that will result in "investment-grade" carbon credits that maintain scientific rigor in delivering climate impact while balancing complex policy, legal, financial, equity, and implementation trade-offs.

PERMANENCE CIWP OVERVIEW



Topics explored

- Monitoring and compensation periods and/or reserve requirements, including consideration of:
 - Methods to provide for longer monitoring and compensation periods (e.g., one hundred years)
 - Whether monitoring and compensation periods should count from the start of the first crediting period or from the vintage of the mitigation outcome
 - Options for transferring the monitoring and compensation oversight to the carbon crediting program or the jurisdiction
- **Pooled buffer reserves, their design, sufficiency** (including periodic stress testing considering a range of scenarios), **feasibility, and possible new designs**
- **Reversal risk assessment tools and procedures** (including risks presented by climate change)
- Insurance products and mechanisms



Building on previous work, a follow-on Permanence CIWP will launch in 2025 and will focus on 3 key areas:

- 1. Buffer pool stress testing piloting
- 2. Feasibility and design of a "Global Permanence Trust"
 - Financial modeling and legal consultation to inform design and structure
 - Feasibility and design of standardized approaches to project level risk assessment
- 3. Role of insurance

THE INTEGRITY COUNCIL

THANK YOU

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- Check out the workshop report from the CIWP Permanence Workshop
 - https://www.cambridge.org/engage/coe/article-details/66c38d1ff3f4b052905d4317



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