



CCSA Briefing — Revision to the EU Delegated Act on CDR Methodologies under the CRCF

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CCSA secured early access to the last version of the draft Delegated Act on CRCF methodologies, which is now in its final adoption phase. All preparatory steps are on track for completion by February 3. Please find below a summary of the key changes.

First, the revision rebalances timelines across removal pathways. For DACCS and BioCCS activities, the maximum activity period is extended from ten to fifteen years, reflecting the long asset lifetimes and capital intensity of engineered carbon removal infrastructure. In contrast, biochar activity periods are shortened to five years, signalling a policy choice to require more frequent reassessment of smaller, more distributed activities with higher variability in feedstocks, practices, and local impacts. Monitoring rules for biochar are correspondingly refined, allowing earlier termination of monitoring only where application is directly overseen by the certification body, and otherwise extending monitoring beyond the certification period.

The updated text recalibrates eligibility and operational rules of biochar carbon removals. Heat utilisation requirements are no longer absolute, with a targeted exemption introduced for mobile biochar facilities where heat recovery would be impractical. At the same time, the revised methodology strengthens land-application safeguards. The 50 tonnes per hectare limit is no longer framed as a per-application cap but as a cumulative ceiling over time, explicitly including uncertified applications and applications made prior to the adoption of the methodology. This materially changes the regulatory treatment of biochar by preventing incremental over-application and embedding long-term land stewardship into the certification framework. The introduction of geographically specific record-keeping requirements reinforces this shift from project-based to land-based oversight. In parallel, the restructuring of soil application categories clarifies where biochar may be applied and aligns eligibility more closely with differentiated environmental risk profiles.

From a methodological perspective, the most significant evolution lies in the treatment of captured CO₂, particularly fossil CO₂. The updated text replaces the atmospheric-versus-fossil distinction with a more granular accounting framework that differentiates fossil CO₂ that is intrinsically associated with the capture process, fossil CO₂ captured from mixed streams in BioCCS, and fossil CO₂ that is co-captured or separately captured. This restructuring has direct consequences for how emissions associated with transport and storage are attributed and prevents both over-crediting and under-accounting in complex capture configurations. The revised equations and variables tighten the link between physical flows and accounting outcomes, reducing scope for strategic stream design and ensuring consistency across DACCS and BioCCS implementations.

The methodology for segregated and non-segregated CO₂ streams is simplified and made more robust. The updated approach abandons loss-factor constructs that depended on inferred quantities and instead relies on proportional allocation based on the atmospheric or biogenic fraction of injected CO₂. This improves



auditability and aligns accounting more closely with measurable quantities at injection points, while preserving methodological conservatism through uncertainty factors.

The updated Act also strengthens monitoring and reporting obligations across all activity types. Monitoring reports must now clearly distinguish between gross removals, associated greenhouse gas emissions, and the resulting net carbon removal benefit. For biochar activities, the reporting scope is expanded to include mandatory laboratory analyses, embedding material quality and durability more firmly into the certification logic.