

CCSA Greenhouse Gas Removal (GGR) Task Subgroup

12/05/2025
15:00 (BST)



Agenda

	Time	Topic	Speaker
1.	15:00	Introduction & CCSA competition law policy notice	Greg Williams (convenor)
2.	15:05	GGR Updates <ul style="list-style-type: none">- BSI GGR Flex Standards: Feedback from Advisory Group Meetings- Independent GGR Review	Despoina Tsimprikidou (CCSA Secretariat)
3.	15:15	VCM: Raising Integrity Consultation	All
4.	15:55	Proposals for GGR Regulations Consultation	All
5.	16:25	AOB, next steps and next meeting date	Greg Williams (convenor)



House keeping & Introductions

- Slides & Recording will be available for members after the meeting.
- CCSA Competition Law Policy notice is attached to the meeting invite and available on the CCSA website.
- If you are not speaking, please mute your microphone.
- Please **raise your hand** if you wish to comment, you will be invited to come off of mute, if you can also turn on your camera.
- Please also pose any **comments in the chat** and these will be picked up by the secretariat.
- **Introductions** of any new members joining the call.

GGR Updates

Despoina Tsimpridou (CCSA)



BSI GGR Flex Standards Development



- **Use Case & Scope**

- Adopting 2-phase approach for these MQTs to only apply for traditional VCMs.
- ETS considerations will be covered as part of full methodology (PAS).
- Mixed feedstocks signposted throughout the standard but standalone WECCS methodology will be developed as part of PAS.

- **Crediting Periods**

- The Government will specify a carbon crediting programme. There is no commitment to a specific approach. Crediting periods will be within scope of full methodology.

- **Baseline**

- The term “dynamic” in reference to baseline has been scaled back.
- Single baseline for BECCS that includes co-product baseline (previously separate).
- Providing clarity on the frequency of potential ex post changes in baseline rules for operational projects.
- Zero baseline allowable for DACCS but not assumed.

- **Quantification Equation**

- Agreement on sign convention with some changes in proposed equation. Final revision to be made.

- **Materiality:** adopting CRCF approach of 2% materiality threshold. Proposal for cap postponed to full methodology.

- **Annual temporal matching:** annual matching allowable with review end of 2028 subject to feasibility assessment and intention to move to sub-annual post-2029.



Independent Review of GGRs

- Terms of Reference published – Dr Alan Whitehead leading the Review.
- Will **inform how GGR technologies can assist in meeting the UK's net zero goals.**
- Current understanding is that this will **not** affect ongoing work in terms of GGR deployment, business model development or spending review.
- Will contribute to building a robust evidence base for 2035 onwards regarding GGR technologies' deployment pathway and Carbon Budget 7.
- Timeline: to be finalised within a year.
 - Call for Evidence to be published shortly.
 - DESNZ roundtables likely to take place.

Scoping out Call for Evidence content

- Positioning the UK as a global leader in GGR deployment & first mover advantages
- Evidencing growth potential
- Export potential of GGR credits
- Drive forward market development for GGRs (e.g. public procurement options)
- Crowding in private capital

VCM: Raising Integrity Consultation

Discussion on initial views



Consultation Overview

Closes: 10 July 2025

VCM Principle	Proposal
Use credits in addition to ambitious actions within value chain	<ul style="list-style-type: none"> • Endorse VCMI’s Claims Code of Practice as international best practice to reduce value chain impacts. • Recognise interim steps to meet that best practice. <ul style="list-style-type: none"> • <i>CCSA response: set out importance of using carbon credits to address Scope 3 emissions.</i> • Apply insetting to maximise high integrity value chain emissions reductions. (not address)
Use high integrity credits	<ul style="list-style-type: none"> • Endorse ICVCM’s principles and assessment framework as representing a minimum quality requirement for global VCM credits. <ul style="list-style-type: none"> • <i>CCSA response:</i> <ul style="list-style-type: none"> • <i>Importance of alignment with GGR Standard.</i> • <i>Elaborate on the risk of overprescribing requirements without enabling lessons learned from first projects.</i> • <i>Focus on high-quality/high-integrity engineered GGRs.</i>
Measure and disclose the planned use of credits as part of sustainability reporting	<ul style="list-style-type: none"> • Views on voluntary disclosure of credit use by buyers. • Incorporate VCMI disclosure elements into voluntary UK guidance for buyers. <ul style="list-style-type: none"> ➤ <i>CCSA response: this assumes buyers are already engaged with VCMs. While we welcome voluntary disclosure of credit use, there need to be further demand-side measures to incentivise corporates to purchase high integrity carbon credits.</i> ➤ <i>Too many requirements might deter organisations from seeking to use carbon credits.</i>

- The Government is consulting on measures to **raise integrity and standards in Voluntary Carbon Markets (VCMs) and Voluntary Nature Markets (VNMs)**
- Seeks views on the implementation of the UK government’s six VCM Principles that were published at COP in November 2024.
- The consultation sets out the policy rationale for each Principle, elaborating on its relevance to different VCNMs, and inviting views on how it could be implemented.



VCM Principle	Proposal
Plan ahead	<ul style="list-style-type: none"> • Credit users should set and disclose long-term and interim targets for transition planning to achieve net zero no later than 2050. <ul style="list-style-type: none"> • <i>CCSA response: More relevant to buyers so minded to not respond in detail.</i> <ul style="list-style-type: none"> • <i>We agree that government should provide a clear signal to organisations on the acceptable use of credits to support demand for GGRs. However, this needs to go beyond voluntary markets and into compliance to support initial demand for GGRs.</i>
Make accurate green claims using appropriate terminology	<ul style="list-style-type: none"> • Develop official definitions for key terminology. • Commission the development of a standard for green claims. • Develop guidance for businesses on the use of carbon credits to confirm that a business can only accurately use carbon credits to claim to be ‘Net Zero’ once (a) approaching the point at which all planned/possible emissions reductions within value chains have been implemented, and (b) residual emissions have been neutralised by high-quality permanent removals. <ul style="list-style-type: none"> • <i>CCSA response: focus on higher quality of engineered removals that instil confidence in the market. Recognising that uncertainty around green claims mainly stems from inaccurate nature-based claims.</i> • <i>Any comments on mitigation hierarchy for green claims?</i>
Co-operate with others to support the growth of high integrity markets	<ul style="list-style-type: none"> • Explore cooperation between regulators and policymakers in the UK, including Devolved Administrations to facilitate an industry-led process to develop a suite of interconnected investment standards and to ensure effective governance for projects and the use of credits. • Endorsement of outputs from VCMI and ICVCM as an important way to support global standardisation. <ul style="list-style-type: none"> • <i>CCSA response: any comments on interoperable market infrastructure to support credit trading?</i>
Cross-cutting enablers	<ul style="list-style-type: none"> • Enable access to markets for suppliers recognising VCMs as key opportunity for growth: UK skill base, innovation, UK ETS, Article 6. • Address barriers to purchasing of engineered GGRs: increase voluntary demand, develop GGR standard & integrate in UK ETS.



Proposals on GGR Regulations

Discussion on initial views



Consultation Overview

Closes: 9 June 2025

Provisions	Proposal
SoS Direction to counterparty	<p>Apply Regulations 5, 6 and 7, of the Carbon Capture Revenue Support Regulations 2024, without substantive amendment, for directions to offer to contract relating to GGR and Power BECCS contracts.</p> <ul style="list-style-type: none"> ➤ <i>Minor amendments to clarify the application of these Regulations to GGRs and Power BECCS.</i>
Publication of information	<p>Apply Regulation 8 with minor amendments which mandates a counterparty to publish each carbon capture revenue support contract once the contract is entered into, ensuring that any confidential information and personal data is excluded.</p> <ul style="list-style-type: none"> ➤ <i>Would include Strike Price, Capex Payment Rate, the Initial Term, the Relevant Direction, the Reference Price.</i> <p>Apply Regulation 9 which places an obligation on the counterparty to establish and maintain a public register that captures key project information.</p> <ul style="list-style-type: none"> ➤ <i>For the GGR business model, it is proposed that Initial Capex Payment Rate & Current Capex Payment Rate are not required as part of the key project information.</i> ➤ <i>For both GGR and Power BECCS, additional project information would be required:</i> <ul style="list-style-type: none"> ➤ <i>Amount of GGR credits the project has generated</i> ➤ <i>Biomass feedstock details, including sustainability criteria</i> ➤ <i>Details on energy source and its use within the facility to support GGR activities (both DACCS and BECCS)</i> ➤ <i>Full Life-Cycle Analysis (LCA), including project boundaries underpinning the lifecycle analysis</i> ➤ <i>Details of existing government support</i>

- Seeks views on **proposals for revenue support regulations** in relation to the GGRs and Power BECCS business models.
- Government is consulting on **amending the Regulations in place (2024) to ensure they are appropriate for the GGR and Power BECCS business models.** Amendments will be applied to ICC, GGR and Power BECCS business models, however different provisions will be in place where required to reflect the nature of each business model.
- **Welcome feedback from both legal and project developer perspective.**



Consultation Overview (cont.)

Provisions	Proposal
Counterparty's ability to carry out its functions	<p>Apply the provisions set out in Regulation 10 for notification of defaults for carbon capture counterparties as set out in the Carbon Capture Revenue Support (Directions, Eligibility and Counterparty) Regulations 202 without substantive amendment.</p> <ul style="list-style-type: none">➤ <i>3 months notice to SoS if unable to perform duties.</i>➤ <i>Requirement to provide assistance to secure performance of that function.</i>
Eligibility	<p>Propose to amend the Regulations to accommodate their usage by the GGR business model and to define eligibility for entities for entities which capture CO2 that is in the atmosphere or seawater.</p> <p>Amend Regulation 3, with the inclusion of “is in the atmosphere, or has dissolved in sea water”, with reference to an eligible “carbon capture entity” relating to GGR contracts.</p> <ul style="list-style-type: none">➤ <i>technology neutral approach for capturing carbon.</i>➤ <i>do not propose to include any restrictions as to the class of persons who can be eligible.</i>➤ <i>While the GGR Standard is in development, net negative criteria is not included in the Regulations at this time.</i>➤ <i>Future expectations for an eligible entity will include the requirement to be compliant with the GGR Standard.</i> <p>No amendments for Power BECCS eligibility: provisions of the Regulations can already apply to Power BECCS via ICC/capturing CO2 that has been produced by commercial or industrial activities.</p> <p>Note: additional eligibility criteria may be set out in allocation round guidance, as for example, in the published Track-1 HyNet Expansion Application Guidance.</p>

AOB & Conclusions

- Review actions arising from the meeting
- Next GGR Working Group Meeting: **1 July 2025**
- **VCM Consultation Next Steps:**
 - 1st draft: 30 May
 - Member comments by: 13 June
 - 2nd draft: 20 June
 - Final comments by: 1 July
- **GGR Regulations Next Steps:**
 - Draft response: 16 May
 - Member comments by: 23 May
 - Final high-level comments by: 30 May
- AOB

