



CCSA Briefing Update – EU Delegated Act on CDR Methodologies under the CRCF

(May 2026)

Executive Summary

The [CRCF Delegated Regulation \(EU\) 2026/285](#) officially entered into force on 17 April 2026, transitioning the EU carbon removal framework from legislative theory into a compliance-ready market. Standardised Monitoring, Reporting, and Verification (MRV) rules now provide the regulatory certainty required to unlock private offtake agreements and stack voluntary revenues with national subsidies. This framework serves as the primary commercial vehicle to achieve the EU's 280 Mtpa capture target by 2040.

CCSA Comparative Analysis: CCSA Demands /Position Vs. CRCF Delegated Act

Before detailing the operational rules by asset class, the table below provides a snapshot of our advocacy outcomes¹ based on the final, published texts of the Delegated Regulation (EU) 2026/285 and the Implementing Regulation (EU) 2025/2358.

¹ From the CCSA response to the public consultation on Methodologies for Certifying Permanent Carbon Removals – September 2025. You can revisit the CCSA response [here](#).

CCSA Asks (Sept. 2025)	Final Legal Text	CCSA Assessment
Extend DACCS/BioCCS Activity Period	Maximum activity period formally set to 15 years. [Annex 1.2.1.1]	Strong Win. Secures the long-term commercial certainty necessary for debt financing and CAPEX recovery.
Grid Power Temporal Matching (DACCS)	Annual matching permitted until 2044 for facilities reaching FID before 31 Dec 2029. [Annex 2.3.4.1]	Strong Win. Eliminates the prohibitive operational burden of hourly matching, unlocking near-term deployment via standard PPAs.
Restrict Group Auditing	Group auditing permitted exclusively for carbon farming activities. [Commission Implementing Regulation (EU) 2025/2358, Article 12(1)]	Strong Win. Protects the high-fidelity verification standard required for permanent engineered removals.
Biomass Cascading Principle	Verification only required if the entity "benefits from a relevant support scheme for the energy production." [Annex 4.2(b)(ii)]	Strong Win. Prevents unnecessary feedstock exclusions for purely commercially funded BioCCS installations.
Shift BioCCS Capacity Metric	Shifted the growth constraint from "biomass consumption" to "nameplate energy generation capacity". [Annex 4.3.1]	Partial Win. Resolves the energy density penalty for operators utilising lower-density waste biomass, though strict limits on expansion remain: a facility's generation capacity may only increase by the exact energy required to run the new capture equipment.
Allow Scheme Switching Penalty-Free	Retains exclusion for early withdrawals, but adds an exemption if withdrawal was "unavoidable or necessary." [Commission Implementing Regulation (EU) 2025/2358, Article 8(4)]	Partial Win. The core rule remains to prevent overlapping claims, but the exemption offers necessary commercial pragmatism.
Exclude Greenfield BioCCS NPV Test	New-build facilities must demonstrate economic viability independently, excluding carbon capture revenues. [Annex 4.3.1]	Risk. Rejects our proposed "strategic decarbonisation role" alternative, creating severe bankability hurdles for new-build BECCS projects.



Protect JVs in 'Capture Facility' Definition	Operators defined strictly as "Only the capture facilities". [Annex 1.1.1]	Risk. Legally disadvantages the biogenic CO ₂ emitter in multi-party industrial site structures, requiring complex private contractual workarounds.
Include "Mortars" in Biochar Products	Only BCR activities incorporating biochar in cement, concrete, or asphalt are eligible. [Annex 1.1.2.2.2]	Risk. Excludes a viable building material sector, unnecessarily limiting secondary off-take markets.

Key Outcomes

A. Deep Dive: Engineered Removals (DACCS & BioCCS)

The final text grants capital-intensive infrastructure the visibility required for bank debt. Activity periods are formally locked at 15 years [Annex 1.2.1.1], and standardised baselines are set at exactly 0 Mtpa [Annex 2.1.2] removing the requirement for counterfactual modelling. To protect early-year issuance, facility construction emissions must be linearly amortised over a 15- or 20-year period [Annex 2.3.5]. Furthermore, operators capturing CO₂ from mixed streams are protected: the fossil CO₂ fraction is isolated and explicitly excluded from downstream transport and storage penalties [Annex 2.1.3.1].

However, stringent compliance thresholds now apply. Across all pathways, a strict $\pm 20\%$ measurement uncertainty parameter is active; if overall uncertainty exceeds this limit, zero units will be issued [Annex 2.3.6]. **BioCCS** projects also face specific capacity and economic constraints designed to ensure facilities operate primarily as viable energy providers [Annex 4.3.1]:

- **The Retrofits Prohibition:** Operators cannot leverage a CCS retrofit to expand base power generation for external sale; a facility's generation capacity may only increase by the exact energy required to run the new capture equipment.
- **The Net Present Value Demonstration:** Project finance models must demonstrate a positive Net Present Value (NPV) strictly from the sale of energy or goods, excluding any projected carbon removal revenues. If the underlying energy business is not profitable independently of carbon credits, the project will not qualify for certification.

UK context: The UK has taken a slightly different approach and has not yet set as detailed methodologies for BECCS and DACCS as the EU CRCF has. The UK has also announced its intention to align with the EU CRCF for the development of more detailed GGR methodologies, which the CCSA is supportive of and can help facilitate knowledge exchange where appropriate.

The UK GGR Minimum Quality Thresholds (MQTs) do not explicitly mention provisions on power requirements for a carbon capture facility retrofit or demonstrating net present value. Instead, the UK BECCS MQT accounts for these elements through its provisions on additionality and leakage. Similar additionality provisions require BECCS developers to ensure that the project would not have been financially viable without the revenue from carbon credits. This, however, does not take into account energy security considerations through biomass power plants being able to provide low-carbon dispatchable power to the energy system while also generating negative emissions.

For **DACCS**, grid-supplied electricity requirements have been highly de-risked: facilities reaching Final Investment Decision (FID) before 31 December 2029 may assess temporal correlation on an annual basis until 2044 [Annex 2.3.4.1].

UK context: The UK DACCS MQT has sought to align with CRCF provisions on temporal matching, which are expected to be reviewed by the end of 2028 with a view to assessing the feasibility of higher granularity temporal correlation (e.g. hourly matching). The CCSA notes the practical challenges with this approach and has advocated for alignment with the EU CRCF provisions on this element of the standard to also de-risk UK-based DAC projects in a similar manner.

B. Deep Dive: Biochar Carbon Removal (BCR)

Biochar activities require high-frequency compliance cycles. Activity periods are adopted at a 5-year maximum [Annex 1.2.2.1]. Standardised baselines are locked at exactly 0 Mtpa [Annex 2.2.2]. A targeted heat utilisation exemption for mobile biochar facilities was successfully adopted, enabling flexible off-grid production [Annex 1.1.2.1].

Land application scaling is subject to firm regulatory limits. A 50 tonnes per hectare limit on agricultural and forest soils was adopted as a cumulative ceiling, explicitly encompassing uncertified applications and those made prior to the methodology's adoption [Annex 1.1.2.2.1]. Feedstocks are also closely regulated: if the produced biochar accounts for 50% or more of the facility's total energy outputs, operators are restricted to using exclusively waste or residual feedstocks [Annex 4.3.2]. Finally, no units will be issued for any batch exhibiting a molar ratio of hydrogen to organic carbon (H/Corg) greater than 0.7 [Annex 3.2].