

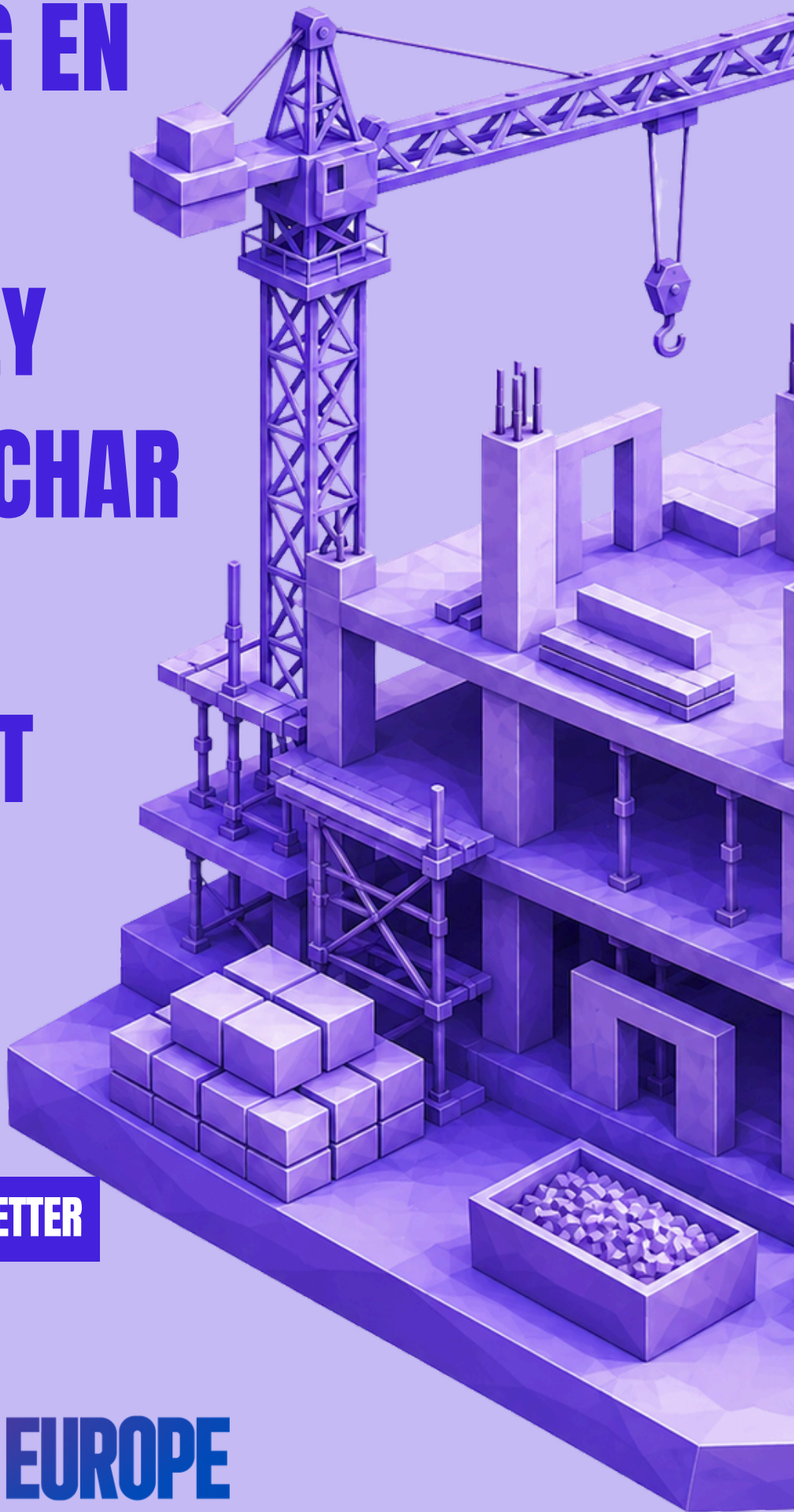
REFORMING EN 15804 TO ACCURATELY CREDIT BIOCHAR BASED PERMANENT CARBON REMOVALS

BIOCHAR EUROPE OPEN LETTER

JULY 2026



BIOCHAR EUROPE



EXECUTIVE SUMMARY

- **Critical Regulatory Gap:** EN 15804 does not account for documenting the benefits of permanent carbon removals, like biochar, within Environmental Product Declarations (EPDs) which prevents accurate reporting of negative emissions in construction products.
- **Scientific Disagreement:** Permanent carbon storage from biochar in stable construction matrices must be differentiated from temporary biogenic storage. Current EPD rules misrepresent this verified permanent carbon removal benefit.
- **Action and Advocacy:** This misalignment with the CRCF requires advocacy with CEN/TC 350 to revise EN 15804. Biochar Europe member companies can help support this effort by contacting national committees and representatives to share relevant documentation.

*For more info, please contact the Biochar Europe Team:
materials@biochareurope.eu*

INTRODUCTION AND CONTEXT

The construction sector's **commitment to achieving climate neutrality requires rigorous and transparent accounting** of all greenhouse gas (GHG) flows, including permanent carbon removals.

Biochar Europe is an association of industry partners, including biochar producers, technology developers, cement manufacturers, and construction companies. As part of Biochar Europe's Materials Working Group, for more than two years, these organizations have been engaging with industry experts to clarify how Environmental Product Declarations (EPDs) account for these critical removals within life cycle assessment calculations. The EPD reporting rules for construction materials, **governed by the European standard EN 15804**, serve as the vital foundation for product transparency across the European construction market.

However, **the existing standard incorrectly does not allow permanent carbon storage**, particularly from highly durable carbon storage pathways, like biochar. The current framework was developed considering traditional wood-based building products that typically decompose in landfills or are incinerated at end-of-life, which lead to the rule that the storage of biogenic carbon from all sources, be it permanent or temporary, is not allowed.

This rule fails to recognize that, **when embedded into robust concrete matrices, biochar poses no risk of re-emitting CO₂ at end-of-life**, as affirmed and written into regulation by the Carbon Removals and Carbon Farming (CRCF) Regulation.

To encourage climate action and accurately reflect the verified stability of carbon removal within building material products, **EN15804 must urgently evolve to align with advancing climate science and emerging national and EU policy**, such as the CRCF.

These changes must proceed with guardrails. At a minimum, "verified" must require that the net removal is quantified across the full value chain with independent third-party auditing. Additionally a public listing in a registry documenting the removal activities, auditor, claim holder, and claim status is needed.

EUROPE HAS A SUBSTANTIAL NEED FOR CARBON REMOVAL CAPACITIES TO MEET 2045 PRIORITIES. ENABLING MARKET ACCESS AND FAIR COMPETITION OF SUSTAINABLE CONSTRUCTION MATERIALS, LIKE THOSE WITH BIOCHAR, ARE ESSENTIAL TO DRIVE THESE TARGETS.

LIMITED PROGRESS IN CHANGES TO EN 15804

There are two specific clauses within EN 15804 that are core to the misalignment:

- **C.2.3:** Addressing GHG removals
- **5.4.3:** Addressing the effect of biogenic carbon storage

**IT IS ESSENTIAL FOR CONSISTENT CLIMATE ACCOUNTING THAT THE
EN15804 STANDARD IS ALIGNED WITH NEW EUROPEAN UNION
DEVELOPMENTS, SUCH AS THE CRCF.**

Outside of the biochar community, there has not been a clear movement to update the EN 15804 standard, with most groups pointing towards the EU commissions and relevant standards bodies as the ones required to take up the decision and action process.

The resulting inaction means that a number of CDR methodologies, including biochar, do not have their permanent carbon storage recognized within EPD calculations and are not receiving the benefits required for broad adoption. This limits the potential for a prominent climate impact.

WHAT THIS MEANS FOR THE BIOCHAR COMMUNITY

This has a direct and significant impact on how biochar's proven climate benefit is applied in the European construction market:

- **Permanent Biogenic Carbon Storage is not Recognized:** In the case of biochar, the carbon stored is shown as a net carbon negative in production modules (A1-A3) but released at the end of life (C1-C4).
- **The Climate Benefit is Neutralized:** This effectively removes the credit for long-term sequestration, preventing the product's EPD from accurately reflecting its permanent negative emissions profile and from distinguishing the product from less sustainable alternatives.
- **Mandatory Reporting Under GWP-Biogenic:** EPDs must continue to report all CDR removals from atmospheric CO₂ under the GWP-biogenic category, irrespective of whether the removal is permanent or temporary.

For biochar companies, **this regulatory misalignment hinders the ability to credibly communicate and verify the full, permanent carbon storage benefits for biochar** in building and material applications, and at the same time creating a critical disconnect between the EPD system and the recognized value of carbon permanence under frameworks like the CRCF.

BIOCHAR EUROPE'S CORE DISAGREEMENT: NOT ALL BIOGENIC CARBON IS EQUAL

Biochar Europe has a strong concern regarding any approach that fails to differentiate between permanent and temporary types of carbon storage:

- **Biochar Carbon Removal is Permanent Carbon Removal:** Biochar is an engineered material that sequesters carbon for centuries to millennia in suitable environments like soil or technical materials. This permanence is especially well safe-guarded when it is embedded into chemically and physically robust matrices like concrete.
- **Misalignment with Climate Science:** The current mandate to "balance the negative GWP-biogenic value" ignores the established scientific fact that biochar's sequestration meets the criteria for permanent removal, like carbonation of biogenic CO₂ into concrete.
- **Undermining Market Solutions:** The standard, in its current version, fails to recognize and incentivize innovation and investment in high-integrity, permanent CDR technologies and products, which still require independent third-party verification of net removals across the full value chain to avoid double counting.

BIOCHAR EUROPE'S PLAN AND CALL TO ACTION

The current position is not fixed. Further actions at the European Commission level and by CEN/TC 350, are a critical window for targeted advocacy.

Biochar Europe is taking the following steps:

- **Technical Advocacy:** Dedicated engagement with CEN/TC 350 and other relevant European standardization bodies to formally propose amendments or differentiated accounting methods within EN 15804 that explicitly recognize and credit verified permanent carbon removal.
- **CRCF Alignment:** Championing the need for EN 15804 to achieve full alignment with the scientific principles and permanence criteria established by the CRCF.

KEY POLICY ASKS

Integrate CRCF-certified biochar carbon removals into Environmental Product Declarations, whole-life carbon assessment methodologies and public procurement frameworks to value it within Europe's industrial decarbonisation framework.

Ask #1

Amend EN 15804/EPD methodology so CRCF-certified permanent carbon removals embedded in construction materials are transparently reported and credited.

Ask #2

Ensure future EPBD transposition and green building certification schemes across countries recognises durable carbon storage in construction products.

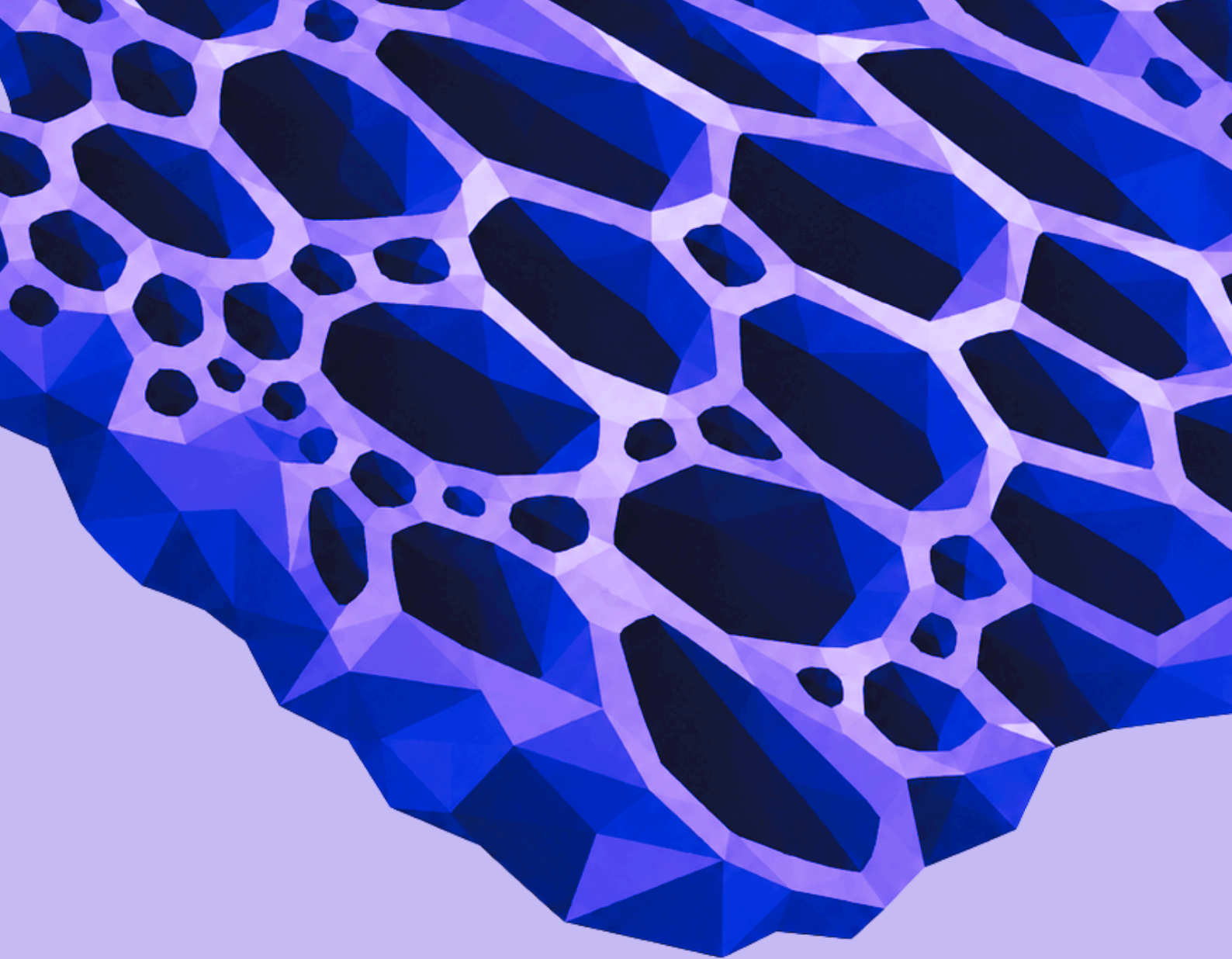
Ask #3

Explore a dedicated compliance pathway allowing CRCF-certified durable carbon removals embedded in construction materials to contribute to the decarbonisation obligations of the hard-to-abate construction sector covered by the EU ETS.

HOW MEMBER COMPANIES CAN HELP

The effectiveness of this advocacy is dependent on a unified voice across the community.

- **Share the Message:** Disseminate this position paper and the core message. Permanent carbon removals must be accounted for differently than temporary biogenic storage.
- **Contact Biochar Europe:** Share any formal communication, technical documentation, or experiences encountered with EPD Program Operators or consultants regarding this issue. **Contact materials@biochareurope.eu**
- **Reach Out to National Policy Makers:** Engage with national representatives to CEN/TC 350, government officials responsible for implementing the CRCF, or building standard providers. Stress the economic and climate importance of correctly accounting for biochar as permanent carbon removal.
- **Leverage EPD Disclosures:** While EPDs cannot reflect permanent negative carbon storage, ensure EPDs clearly and transparently declare any biochar removals within GWP-biogenic, in line with current status of EN-15804. This remains a crucial factual basis for external claims and future revisions.



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Developed by the Biochar Europe's Materials working Group

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