

Environmental newsletter

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New Opportunities in the Low Carbon Economy: the EU Carbon Removal Certification Framework (CRCF)

Regulation 2024/3012 of the European Parliament and of the Council of 27 November 2024 establishing a Union certification framework for permanent carbon removals, carbon farming and carbon storage in products (Carbon Removal Certification Framework – „**CRCF**”) entered into force in June 2024. The new rules introduce harmonized criteria for evaluating CO₂ removal activities across the European Union, enhancing the credibility of reduction efforts and reducing the risk of greenwashing.

What activities does the CRCF cover?

The CRCF Regulation covers three main types of activities related to the permanent removal or storage of CO₂:

1. Permanent carbon removals, which include advanced technologies for capturing CO₂ from the atmosphere and storing it for hundreds or thousands of years, such as:
 - DACCS (Direct Air Capture with Carbon Storage),
 - BECCS (Bioenergy with Carbon Capture and Storage),
 - production and use of biochar (plant based charcoal), provided the carbon remains sequestered in soil over the long term.
2. Carbon farming and soil emission reductions, meaning agricultural and forestry practices that:
 - remove CO₂ (for example, afforestation, agroforestry, regenerative cropping),

- reduce soil emissions (for example, reduced nitrogen fertilization, peatland preservation).
3. Carbon storage in long lasting products which permanently lock in CO₂ in materials such as:
 - biogenic construction materials (wood, hemp, straw),
 - Industrial products based on bio materials.

Certification Criteria under the CRCF

The CRCF Regulation establishes four certification pillars, summarized by the acronym QU.A.L.ITY – Quantification, Additionality, Long term Storage, Sustainability. Each certified activity must demonstrate:

- Quantification: accurate and reliable measurement of the CO₂ removed,
- Additionality: proof that removal is beyond what would occur under a baseline scenario,
- Long term Storage: assurance that CO₂ will remain sequestered for decades or centuries
- Sustainability: compliance with the “do no significant harm” principle to environmental and social systems.

By the end of 2025, the European Commission will adopt delegated acts detailing specific methodologies for monitoring, reporting and verification. To date, the Commission has published draft methodologies for permanent carbon removal and initial proposals for carbon farming practices.

How will transparency and credibility of certification be ensured?

To guarantee full transparency and eliminate the risk of double-counting CO₂ removals (i.e. the same unit of captured carbon being claimed by more than one party or in more than one reporting system), all certified activities will be recorded in a dedicated EU digital registry. The European Commission is obliged to establish this registry by 27 December 2028. Until that date, the duty to maintain public, automated and interoperable registers rests with the so-called certification systems - entities responsible for applying methodologies compliant with the CRCF Regulation, independently verifying projects, and overseeing adherence to the Q.U.A.L.I.T.Y criteria.

What does this mean in practice—and for whom?

The CRCF Regulation does not prescribe specific uses for certified units, leaving Member States and market participants the flexibility to decide how to apply them. The EU certification system is primarily designed to help public and private entities substantiate voluntary claims of carbon removal or soil emission reduction, while increasing transparency and reducing the risk of greenwashing.

As a result, this system can:

- create new revenue streams for industries deploying removal technologies,
- support the development of products for permanent carbon storage,
- enable additional income from agricultural and forestry practices that capture CO₂,

Certified CRCF units can be applied in, among others, the following sectors:

Real Estate and construction

With the growing importance of life cycle assessment (LCA) and the upcoming revision of the Energy Performance of Buildings Directive, buildings' capacity to store CO₂ may be reflected in their Energy Performance Certificate. Certification can support compliance with the EU Taxonomy and facilitate access to green finance instruments such as green bonds, loans or EU funding.

Agriculture and forestry (carbon farming)

CRCF enables monetization of CO₂ removal practices (e.g. sequestration farming, afforestation and agroforestry, peatland protection). Farmers and forest owners can generate certificates for use on voluntary carbon markets or under national support schemes.

Financial sector and carbon markets

CRCF lays the groundwork for issuing reliable removal credits that may back green bonds, ESG funds or sustainable investment portfolios.

Industry and material production

Sectors such as cement, steel and chemicals can deploy permanent CO₂ storage technologies (e.g. concrete carbonation, CO₂ mineralizing materials). Removal certificates can bolster decarbonization strategies and regulatory compliance.

Waste management

Operators of bio waste facilities can implement CO₂ removal processes—such as biomass pyrolysis or biochar production (the creation of plant based charcoal under low or no oxygen conditions). Certificates generated from these activities provide an additional revenue stream, support a circular economy model and improve environmental performance.

Climate and ESG communication

CRCF certified units offer credible evidence of carbon removal for net zero strategies, ESG reporting and stakeholder communications. They apply to environmental impact disclosures (CO₂ removal), compliance with the CSRD and the forthcoming Green Claims Directive, strengthening sustainability reports' integrity and reducing greenwashing risk. Importantly, only CRCF certified, independently verified, permanent removals may underpin compensation claims under the Green Claims framework.



What's next?

Although the CRCF Regulation is already in force, its full implementation will proceed in phases.

The most critical step is to define specific rules for measuring, reporting and verifying various CO₂ removal approaches. **The first delegated act** – prepared with an expert group at the European Commission – has already been published and is now open for public consultation. This act supplements the CRCF by setting out certification methods for particular types of carbon removal activities involving permanent storage¹.

In parallel, the European Commission has released a **draft implementing act**², which is essential for the operational functioning of the entire CRCF system. This document specifies detailed rules for certification systems and bodies, as well as procedures for audits, oversight and registry management. Among other provisions, it lays down requirements for internal control systems within certification schemes, a classification of non conformities and rules for their handling, and the conditions that certification bodies must meet – such as accreditation criteria, auditor rotation and competence standards.

In the longer term, certified CRCF units are planned to be integrated into the EU ETS. This would allow their use not only on voluntary carbon markets but also within regulatory compliance frameworks.

How can we help?

We support clients in preparing for CRCF implementation by offering:

- assessment of which activities qualify for CRCF certification,
- advisory services for designing carbon removal and carbon farming strategies,
- assistance integrating CRCF units with ESG reporting, the EU Taxonomy and CSRD,
- preparation of project documentation in line with upcoming certification methodologies.

¹ Draft Commission Delegated Regulation supplementing Regulation (EU) 2024/3012 by establishing certification methodologies for DACCS, Bio CCS and biochar; Ares(2025)5828622. .

² Draft Commission Implementing Regulation laying down rules for certification systems, certification bodies and audits under Regulation (EU) 2024/3012 of the European Parliament and of the Council, Ares(2025)4438018.

Contact us!



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