EuLA's Feedback on the Commission's Delegated Regulation on Carbon Removals and Carbon Farming – methodologies for certifying carbon farming

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EuLA, the European Lime Association, represents European non-captive lime production through its 24 covered Member States (companies & national associations). Lime is one of the essential building blocks of modern industry. It is used in many essential processes, such as making construction buildings, producing iron and steel, treating contaminated land, purifying drinking water, making sugar and even cleaning gases from powers stations. Lime and its derivatives are also important additives for making paper, glass, and agricultural products.

1. Introduction

The European Lime Association (EuLA) welcomes the Commission's efforts to operationalise the Carbon Removal and Carbon Farming Certification Framework (CRCF) through the development of certification methodologies. The European lime sector is committed to achieving climate neutrality by 2050, and provides solutions that can support the European Union in reaching its broader climate neutrality objectives. Lime-based technologies and applications already contribute to decarbonisation across multiple value chains and offer science-based carbon removal pathways. The lime industry has significant potential to become a net carbon sink through:

- Permanent CO_2 reabsorption during product use and end-of-life (recarbonation), with around one third of process emissions reabsorbed within one year in major applications.
- Enhanced carbonation techniques that increase measurable and additional CO_2 uptake beyond natural recarbonation.
- Combining recarbonation with carbon capture and permanent storage (CCUS/BioCCS), enabling net-negative lime value chains.

2. Recognition of Recarbonation in Compliance and Certification Frameworks

EuLA underlines that the climate benefits of lime recarbonation are not adequately reflected in current carbon accounting frameworks, in particular within the EU compliance market. Lime-based products reabsorb CO_2 over time through carbonation processes. (Read more here.)

Moreover, additional operator-driven measures can enhance this uptake. While CRCF discussions increasingly acknowledge mineral carbonation pathways, baseline recarbonation of lime products remains unrecognised in compliance accounting. This results in an incomplete carbon balance and an overestimation of the sector's net emissions. Plus, additional measures can enhance this uptake. EuLA therefore strongly recommends that the Commission:

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- Ensure that recarbonation is properly recognised in carbon accounting frameworks, including in the EU compliance market
- Develop a dedicated certification methodology for enhanced carbonation, and
- Recognise long-term CO_2 storage in lime-based products and industrial residues.

3. Feedback on the Draft Delegated Regulation & Annex

3.1 Liming is treated as an emissions source, but uptake is ignored

EuLA welcomes this first step on carbon farming methodologies under the CRCF. However, it is important that the framework fully reflects the specific climate impact of liming practices. In particular, the use of lime (including quicklime and hydrated lime), whose production emissions are already accounted for under the EU ETS, differs from untreated limestone in both carbon accounting treatment and mitigation potential. Liming improves soil pH and nitrogen use efficiency, reduces N_2O emissions, and contributes to soil carbon stability.

Liming is a long-established agricultural practice historically used to correct soil acidity and enhance soil fertility. At pH < 5 (i.e. acidic pH), soil acidification affects soil fertility and the yield of many crops. Liming delivers proven climate benefits by reducing nitrous oxide (N_2O) and methane (CH_4) emissions, improving nitrogen use efficiency and enhancing soil carbon stability. Liming contributes to EU objectives by reducing fertiliser dependency, improving resource efficiency and optimising land productivity.

Under Section 1.1.1.1 of the Annex, eligible activities include agricultural practices that:

- increase net carbon removals in soils or reduce net CO_2 emissions (point (a)), and
- reduce direct and indirect N_2O emissions from managed agricultural soils (point (c)

Liming fulfils both criteria. It reduces N_2O emissions through pH optimisation and improves nitrogen use efficiency, while contributing to improved soil carbon dynamics. However, the Annex currently lists "Liming application CO_2" only as a non-LULUCF emission source (Table 2) without recognising its mitigation effects under the eligibility criteria. This results in an incomplete carbon balance.

<u>EuLA therefore recommends explicitly adding liming as an eligible practice under:</u>

- Section 1.1.1.1(a): "(vi) soil pH optimisation practices, including liming, that improve soil carbon stability and reduce net soil emissions."
- Section 1.1.1.1(c): "(v) soil pH optimisation practices that demonstrably reduce direct and indirect N_2O emissions from managed soils."

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3.2 Risk and liability rules should reflect permanence of mineral storage

The annex introduces reversal-risk approaches such as buffer pools and risk rates, which are appropriate for biological carbon sinks subject to non-permanence risks. However, EuLA highlights that lime recarbonation provides permanent CO_2 storage, with negligible reversal risk compared to biomass-based sinks. These permanent storage pathways should therefore not be subject to the same liability assumptions as temporary biological removals. This reinforces the need for a distinct certification methodology for enhanced carbonation.

4. Final Recommendations

EuLA supports the Commission's efforts to establish robust and science-based certification methodologies for carbon farming activities under the CRCF. However, while liming is currently accounted for as a CO_2 emission source, its mitigation effects are not recognised under the eligibility criteria. This results in an incomplete carbon balance and risks underestimating the contribution of liming to EU climate objectives.

EuLA therefore recommends that the Commission:

1. Explicitly recognise liming as an eligible practice under Section 1.1.1.1(a) and (c);
2. Ensure that the carbon farming methodology reflects both emissions and mitigation effects associated with liming;
3. Align accounting approaches with the best available scientific evidence to avoid systematic overestimation of liming-related emissions.

Recognising liming within the CRCF would strengthen the environmental integrity and effectiveness of the carbon farming framework.

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