

Annex to provide clarification on input to the Public Consultation on International Carbon Credits

Section 1, question 3:

With respect to Question 3 on who should finance international credits, we would like to clarify that this question should be understood as referring to who should be responsible for purchasing international credits. In this context, our selected response, namely “Companies, for example under the polluter pays principle or to fulfil their net zero commitments,” reflects the view that the primary responsibility for acquiring such credits should rest with companies. The question is not intended to address who should finance the underlying mitigation activities, projects, or crediting mechanisms from which those credits are generated.

Section 1, question 7:

We consider that the framing of this question does not adequately capture the relationship between domestic climate action within the EU and the use of international carbon credits. By presenting investments inside and outside the EU as competing alternatives, the question risks creating a false dichotomy. In practice, both should be understood as elements of a coherent and complementary climate strategy.

The limited use of high-quality international carbon credits may also play a complementary role in the broader policy framework. Against this background, the scale proposed in the questionnaire risks oversimplifying a more nuanced policy position.

For these reasons, we have not selected a response to this question, as the available options do not adequately reflect the view that these elements should be regarded as complementary rather than as competing alternatives.

Section 2, question 14:

The selection of this option reflects support for using the Article 6.4 mechanism as the appropriate baseline for EU quality criteria. It recognizes the value of building on an existing international framework, rather than establishing separate standards that could lead to greater complexity and fragmentation.