

CARBON GAP'S
**GUIDE FOR
EU CDR
ADVOCATES**

Why should you advocate? Becoming a trusted advisor on CDR policy

Public policy shapes the market for carbon removal. Decisions on standards, mandates, and funding will determine which technologies scale and which companies benefit, so it is worth shaping those decisions rather than leaving them to others.

The EU environment, with its pre-established processes and bureaucratic vocabulary, can feel intimidating for small organisations. It may be tempting to let the big players do the talking. But CDR is not yet a subject that speaks for itself. It needs advocates who understand the technology and can communicate the sector's needs from the field.

There are two broad ways to advocate. Pressure-based advocacy pushes policymakers to prioritise an issue, usually through a clear ask, and is best used for flagging something that isn't working or

needs urgent attention. Problem-solving advocacy focuses on solving technical questions with the policymaker and is best suited for unsettled issues. Both have their place, but most CDR policy questions are technical and open. If you want to become a trusted advisor to regulators, rather than one of the many voices demanding something, problem-solving is where to focus.

As a CDR practitioner, you hold knowledge and operational experience that policymakers simply do not have access to elsewhere, and they value it. Officials want to hear from the people advancing Europe's innovation frontier.

The expertise is already yours. This booklet covers the rest.

OTHER STAKEHOLDERS

Trade associations represent industry interests in Brussels. CDR interest is represented by the Negative Emissions Platform.

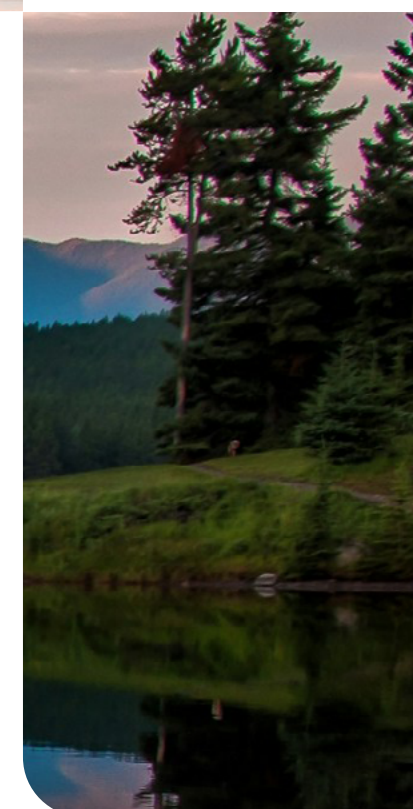
Think tanks don't lobby, but offer useful, often economic and regulatory insight, and can be good partners. CONCITO, Agora Energiewende, and SWP all work on CDR projects.

Media shapes the policy debate in Brussels. Large outlets like Bloomberg, Politico, and Euractiv focus on the politics of climate. Trade media such as Carbon Pulse or Contexte cover negotiations in detail, including amendments.

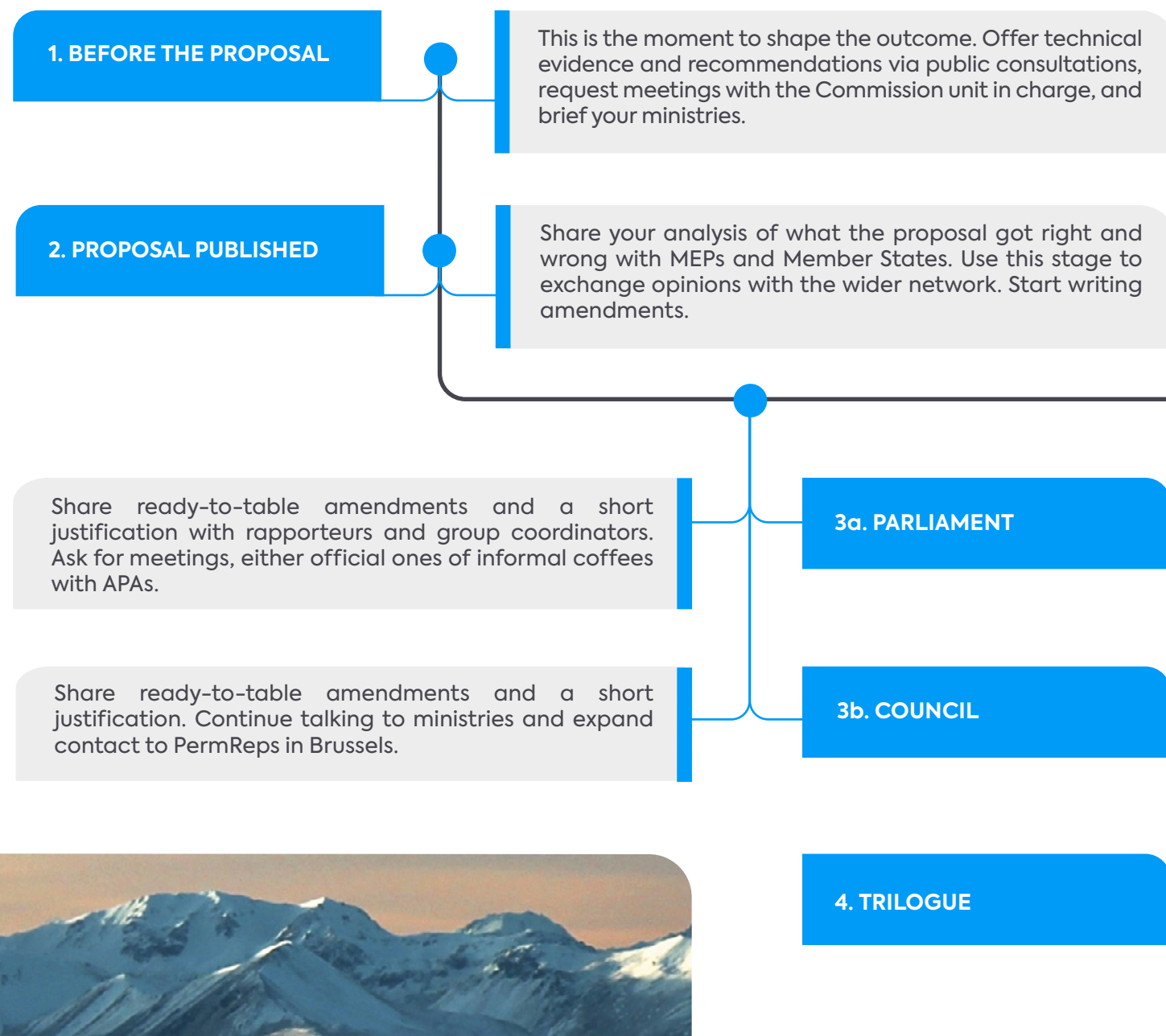
Climate NGOs increasingly have dedicated CDR specialists. Organisations like Bellona, Carbon Market Watch and CAN Europe lobby to keep CDR laws aligned with environmental standards.

Who should you meet? An overview of Brussels decision-makers

	THE COMMISSION Represents the EU's interest as a whole.	THE PARLIAMENT Represents the interest of EU citizens.	THE COUNCIL Represents the interest of EU Member States.
WHAT IT IS	The technocratic powerhouse in charge of proposing new EU laws. It writes the first draft and decides what goes into it.	The body made up of directly-elected MEPs from every EU country, organised into political groups much like a national parliament. It debates, changes and approves the Commission's proposal.	The body represented by national ministers and technical staff, who, like the European Parliament, negotiate their own changes to the Commission's proposal.
WHAT INPUT TO PRIORITISE	Technical data, modelling, economic analysis and project case studies to back policy recommendations	Policy briefs and explainers, ready-to-table amendments with a short justification, reactions to the Council's position.	Policy briefs and explainers with a national angle (data on costs, job creation, implementation challenges); ready-to-table amendments with a short justification.
KEY PLAYERS FOR CDR	DG CLIMA is in charge of climate policy and designs most of CDR legislation. Each unit (team) oversees a different issue, which is helpful to know if you'd like to help the Commission shape future CDR policies. • CLIMA A.1 steer system planning and overall climate governance. • CLIMA B.1 are responsible for the ETS Directive. • CLIMA C.3 oversee the CRCF and the Buyers' Club. Other relevant DGs are: • RTD – R&I for CDR • GROW – industrial angle • ENER – carbon management • ENV – nature restoration and credits • AGRI – carbon farming and Common Agricultural Policy	Rapporteurs & shadows Every negotiated policy has rapporteur – a lead MEP who drafts the Parliament's position, supported by shadow rapporteurs from other political groups. Coordinators Within each political group, an MEP coordinator instructs other MEPs how to vote in a specific committee. Assistants & advisors Behind the scenes, Accredited Parliamentary Assistants (APAs) handle much of the day-to-day work, including meetings and amendments. Each political group has advisors available to support policy work.	PermReps Each country has a Permanent Representation in Brussels, staffed by attachés and technical personnel who work through the details. Ministries Oftentimes, attachés relay a pre-agreed national position. The latter comes from the relevant national ministry (e.g., climate ministry). Your strongest opening is with ministries in countries where you have sites or business, but don't limit yourself to those alone. Denmark, Germany, the Netherlands, and Sweden all have active CDR programmes.



When to advocate? The lifecycle of a policy



TYPES OF EU REGULATION

REGULATION

Directly applicable across the EU. No national changes are made; the text applies as written.

Example: Climate Law

DIRECTIVE

Sets the goal, but must be transposed into national law. Countries can have some freedom in how they achieve the outcome.

Example: EU ETS

SECONDARY ACTS (e.g. Delegated Acts)

Used for technical elements, such as methodologies or reporting templates. Parliament and Member States cannot amend these, only accept or reject them as a whole. The law itself will specify which elements will be worked out via secondary legislation later.

Example: CRCF methodologies

For a step-by-step advocacy guide, visit the Policy Tracker.



How to advocate? Tips to structure an effective campaign



1. Identify where policy can help

Chances are, you don't have resources to engage on every law. Start by mapping the technical, operational, and financial challenges in CDR that still need policy or legislation to resolve them. Then ask what your organisation can add, whether that's data, field experience, or a workable methodology. Split issues into Tier 1, where you engage actively, and Tier 2, where you monitor. Write concrete goals – not "raise awareness", but "help define permanence as over 100 years in the CRCF". There will be areas where your organisation isn't best placed to lead; in those cases, you might want to provide evidence or expertise to the organisations that are.



2. Prepare your contribution

Think beyond a single ask: what materials would actually help someone reach a good decision (i.e. data, technical explainers, a comparison of the options). Where an ask is the right tool, keep it specific and rooted in the policy, addressed to someone with the power to deliver it, one or two per meeting. For most technical, operational, and financial CDR issues, the more valuable move is arriving with the analysis that helps them solve the problem themselves, like an analysis of regulatory trade-offs.



3. Prepare leave-behinds

This is as an extended version of what you're proposing, whether an ask or a piece of analysis. Politicians are busy, so keep it brief and put the recommendations on top. When writing, remember that the briefing must make sense without you there to explain it.



4. Maintain contact throughout negotiations

Send a thank-you email the same day, with anything you promised attached. Log what was said, especially pushback and concerns raised. Re-engage at key milestones: the draft report, the committee vote, the trilogue.



5. Leverage your network

The CDR sector is small, but it has a sizeable network of advocates. Map out who your allies are, and where resistance sits. Coalitions, trade associations, and joint letters divide the workload and add weight to a shared position. But broad associations can dilute your specific ask, and a coalition complements direct engagement, it does not replace it.

How to structure your argument? The pyramid principle

Lead with the headline, then build the supporting layers underneath. Structure every pitch, spoken or on a slide, in this order:

1

Problem:

Name the gap plainly. This is your headline, so state it in one line.

2

Implications:

Why it matters if nothing changes, covering the economic, social, and technical angles.

3

Solutions:

What you propose, set alongside the other options being discussed. Give the pros and cons honestly, not just for your preferred route. This will give you more credibility.

4

Offer or ask:

Where you need the policymaker to grasp that an issue matters, a clear ask helps them gauge the priority. In problem-solving advocacy, relevant for more technical CDR questions, the strongest close is often an offer to help work through the problem together, rather than a demand.

How to talk about CDR simply?

Instead of...

Risk of non-additionality

Risk of mitigation deterrence

Respect the like-for-like principle

Say....

The chance [this activity] would have happened without the legal mandate/incentive

The risk that removals become an excuse to delay cutting emissions

Match fossil-based emissions with permanent removals, biogenic emissions with temporary removals

Be wary of finance terms (e.g., burn rate, pre-seed, Series A) and science terms (e.g., alkalinity, silicate rocks, electrochemical). Instead, try to explain what these processes involve in simple words.

"Words that Work" by Frank Luntz is a fantastic resource to learn more about strategic framing.

How to build a memorable narrative?

A story that isn't memorable gets forgotten the moment you leave the room, no matter how sound the argument was.

Answer two questions, in this order: what problem do you solve, and why should someone outside the sector care. Then find one analogy that survives being repeated badly by someone else, since it will be. For example: "we turn agricultural waste into biochar – locking carbon in soil and helping farmers, like turning farm trash into a climate treasure."

How to support your argument with slides?

One idea per slide. One or two numbers you want remembered, made large enough to stand alone. Every slide must make sense once forwarded on without you in the room to talk over it. Use a real photo of your pilot or team to make it tangible. Keep technical details for an appendix. Don't read from the slides – practice the presentation in advance.



ABOUT US

Carbon Gap is an independent, Brussels and UK-based non-profit organisation supporting Europe's unique opportunity to lead the responsible deployment of carbon dioxide removal (CDR) to fight climate change through independent and science-led advice.

AUTHOR

Anna Costova, Associate Policy Lead,
with contributions from Rozarah Glenane
and Alexander Mäkelä

carbon **gap**

 www.linkedin.com/company/carbongap

 www.x.com/carbongap

 contact@carbongap.org

 www.carbongap.org

Carbon Gap is a registered charity (charity number 1200562) and a private company limited by guarantee (company number 13557860), registered in England and Wales. Registered office address: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, UK. EU Transparency Register: 159208346089-06

