

# EU Buyers Club Survey

Fields marked with \* are mandatory.

## ABOUT YOUR ORGANISATION AND YOUR EXPERIENCE WITH THE CARBON FARMING MARKET

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The European Commission is currently implementing the [Carbon Removals and Carbon Farming Framework \(CRCF\)](#), a voluntary EU framework designed to certify high-quality carbon removals and carbon farming activities, with the objective of ensuring credibility, transparency and environmental integrity across this emerging market.

As part of this work, the European Commission is exploring the establishment of an EU Buyers' Club to help stimulate and structure demand for CRCF-certified units, notably by mobilising and coordinating voluntary public and private buyers.

In this context, the Commission invites you to share your views in this survey, focusing on barriers and motivations to invest in carbon farming activities specifically, as well as the role that an EU Buyers' Club and an associated EU Purchasing Facility could play in stimulating demand for CRCF-certified carbon farming units.

**Survey Closure:** 2026, 26 May

**Approximated answer time:** 25 minutes

**\* What is your full name?**

Ulriikka Aarnio

**\* What organisation do you represent?**

Climate Action Network Europe

**\* What type of organisation do you represent?**

Select the option that best describes your organisation.

Company / business

- Business association
- Academic / research institute
- Non Governmental Organisation (NGO)
- Public authority
- Citizen
- Other (please specify)

**\* What sector(s) does your organisation operate in?**

Select the option(s) that best describes your sector(s) of activity.

- Farming
- Agricultural Inputs
- Agri-food Industry
- Retail and Wholesale
- Forestry: primary production, owner
- Forestry: woodworking industry
- Other industry (please specify)
- Financial services
- Other (please specify)

**\* Please specify the sector your organisation operates in.**

Our organisation works on policy analysis, stakeholder coordination, and environmental integrity in relation to carbon farming and broader land-based climate action. We contribute independent expertise, facilitate dialogue among civil society and policymakers, and advocate for approaches that support climate mitigation, biodiversity, ecosystem resilience, and a just transition for farmers and land managers.

**\* How would you describe your organisation's role in the carbon farming ecosystem?**

Select all that apply.

Carbon farming refers to land management practices - like regenerative agriculture - that enhance carbon sequestration - the process of capturing and storing CO<sub>2</sub> emissions - in forests and soils. These practices can also reduce GHG emissions from soils, while delivering additional benefits in terms of biodiversity and ecosystem restoration. (Source: European Commission)

- My organisation is interested in buying carbon credits from carbon farming
- My organisation is interested in promoting carbon farming action in its value chain (e.g. investing to enhance resilience or to claim emissions reductions and/or removals in scope-3 reporting)
- My organisation implements carbon farming on the ground (farmer / forest owner / land manager / project developer / aggregator)
- My organisation facilitates carbon farming markets (Intermediary / broker / reseller / certification scheme / registry)
- My organisation supports carbon farming operators by providing MRV (monitoring, reporting and verification) services
- My organisation carries out scientific research to expand the knowledge on carbon farming

- My organisation does policy advocacy at EU or national level in relation to carbon farming
- My organisation manages (public or private) funds that support carbon farming activities (e.g. CAP funds, national support schemes, private funds)
- My organisation does not currently have an active role in the carbon farming market
- Other (please specify)

**\* Does your organisation currently invest in or plan to invest in carbon farming?**

- Yes
- No, but we plan to within 2 years
- No, and we have no current plans to do so
- Not applicable

**How would you describe your current level of understanding of the CRCF Regulation?**

*1 = Very limited understanding*

*2 = Basic awareness*

*3 = Moderate understanding*

*4 = Good understanding*

*5 = Expert-level knowledge*

The Carbon Removals and Carbon Farming Framework (CRCF) is the EU voluntary certification scheme for high-quality carbon removals and carbon farming activities. [Link to CRCF page](#)

**Do you see CRCF as relevant for the carbon farming activities of your organisation?**

*Please rate from 1 (not at all) to 10 (very strongly)*

[OPTIONAL] Please explain your rating on carbon farming relevance for your organisation.

While land-based climate action is highly relevant to our organisation, we have limited confidence in the CRCF as a central instrument for carbon farming. Carbon-crediting methodologies fail to consider other crucial environmental and social aspects, including biodiversity protection. Results-based carbon-crediting approaches in the land sector also face profound challenges related to permanence, MRV complexity, and reversals. These approaches may also expose land managers and smaller actors to liability risks and administrative burdens that are difficult to manage in practice. The voluntary nature of the CRCF raises questions regarding its overall effectiveness in driving the scale of action required in the land sector, where clear regulatory frameworks and binding targets remain essential. The undefined use cases for CRCF units raises broader questions about the rationale, scale, and economic sustainability of demand. It is unlikely that Member States would rely on CRCF market structures to achieve land-sector mitigation and removals objectives as these outcomes can be delivered more directly and cost-effectively through public support and activity-based financing mechanisms. The creation of additional market layers, including certification systems, intermediaries, contracting structures, and trading arrangements, increases administrative complexity and transaction costs without any added environmental value.

In our view, activity-based finance, ecosystem restoration funding, and integrated rural support policies are often more appropriate and reliable tools for supporting farmers and land managers.

## BARRIERS & MOTIVATIONS

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**In your opinion, what are the main obstacles (or risks) undermining investment in carbon farming?**

*Select the top 3 obstacles.*

*Maximum 3 selection(s)*

- No obstacle
- Lack of supply / limited availability of certified projects
- Uncertainty around credit quality and environmental integrity (MRV robustness)
- Regulatory uncertainty (claims, accounting rules)
- High transaction costs
- Lack of internal expertise to assess projects
- Greenwashing risk / reputational concerns
- Unclear or uncertain pricing (price volatility)
- Insufficient management / board buy-in
- No perceived strategic value / ROI
- Contracting complexity and legal risk
- Delivery risks (Non-delivery, under delivery, counterparty default)
- Permanence risk (reversal of stored carbon)
- Other (please specify)
- Not applicable

Please specify what other obstacle(s) or risk(s) is undermining investment in carbon farming.

All of the listed obstacles are significant, including delivery, permanence and greenwashing risks. Primary support for good agricultural practices should come from prices covering farmers' cost of production and CAP finance being tied to environmental objectives, including climate. In addition, without regulation (i.e. mandatory climate targets), agri-food companies have little incentive to invest in transformative change in their supply chain, which would often challenge their business model.

### **In your opinion, what would most increase confidence to invest in carbon farming?**

*Select the top 3 answers.*

*Maximum 3 selection(s)*

- A robust and credible EU certification standard (CRCF)
- Price transparency and market benchmarks
- Standardised contractual frameworks
- Public co-financing
- Risk-sharing mechanisms and clear rules on liability
- A curated pipeline of verified projects
- Peer learning and collective purchasing
- Clear guidance on claims and communications
- Other (please specify)
- Not applicable

Please specify what could increase confidence to invest in carbon farming.

Confidence would increase through stable, long-term activity-based financing that can provide predictable support for farmers and land managers. Activity-based financing provides a more level playing field, avoids disadvantageing early movers, and can better consider the multiple functions of land, including biodiversity, water regulation, resilience, and food production. It is also better suited to supporting long-term land stewardship and ecosystem restoration than purely carbon outcome-based approaches, and can reduce the liability risks associated with reversals and permanence. In addition, activity-based approaches are generally simpler, more practical, and lower-cost MRV systems than highly granular carbon quantification methodologies, reducing the burden for both land managers and public authorities.

## **ACTIVITIES OF THE EU BUYERS' CLUB**

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**Please rate the following types of support that the Commission could provide to the Buyers' Club.**

The EU Buyers Club would be a coalition that aims to catalyse and aggregate voluntary public and private sector participation. It would be open to companies, organisations, public authorities and financial institutions of all types and sizes.

This section of the survey focuses on the type of coordination support that the Commission could provide to the EU Buyers' Club.

	Not important	Important but should <b>not</b> be provided by the Commission	Important and should be provided by the Commission	Very important and should be provided by the Commission
Aggregation of Club members / buyers demand	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Definition of a collective purchasing strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Match-making between project developers and buyers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Provision of contract templates for buyers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Guidance on uses of CRCF units	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Monitoring of progress and reporting of projects after contracting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge sharing activities, including production and dissemination of market intelligence and guidance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify what other type of support the Commission could provide to the Buyers' Club.

The Commission should provide important coordination support by developing clear guidance on appropriate use cases. As CRCF activities contribute towards EU and Member State climate targets and NDCs, CRCF units cannot be used by private actors for offsetting or compensation claims, as this would result in double claiming of the same emission removals or reductions. Guidance could also help promote credible forms of voluntary climate action beyond carbon credit purchasing, including direct support for ecosystem restoration, resilience, biodiversity protection, and sustainable land management. The Commission could further facilitate knowledge-sharing and transparency around different financing approaches, including activity-based and public-interest funding models. For Member States in particular, non-crediting approaches are likely more appropriate, more cost-effective, and more predictable way to support removals and ecosystem enhancement, without the additional complexity, transaction costs, and intermediary structures associated with carbon market mechanisms. More broadly, coordination should ensure alignment with EU climate, biodiversity, and land-use objectives, while recognising the multiple functions of land systems beyond carbon outcomes alone.

### What type of purchasing contracts should the EU Buyers' Club prioritise?

Rank the following purchasing contracts.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ Other (please specify)

⋮ Offtake agreements (long-term supply contracts)

⋮ Pre-purchase / prepayment contracts (immediate payment, future delivery)

⋮ Option contracts (right to purchase at a set price)

⋮ Spot purchases (immediate delivery)

[OPTIONAL] Please specify what other purchasing contracts the EU Buyers' Club could prioritise.

The EU Buyers' Club should prioritise purchasing and support models that provide long-term, predictable financing for ecosystem stewardship, restoration, and resilient land management practices, rather than short-term transactions. Approaches that combine stability for land managers with strong environmental safeguards are likely to deliver more durable outcomes.

### **What post-selection monitoring and reporting support should the EU Commission provide to the EU Buyers' Club?**

This relates to maintaining transparency once contracts have been signed.

- Annual delivery and performance reports per project
- Aggregated portfolio performance dashboard
- Alert mechanisms in case of delivery issues or reversal events
- Access to third-party MRV audit results
- Other (please specify)

Please specify what other post-selection monitoring and reporting support the EU Commission should provide to the EU Buyers' Club.

Reporting frameworks should also include information on biodiversity, ecosystem resilience, water impacts, land-use implications, and social outcomes where relevant, rather than focusing exclusively on carbon metrics. In addition, transparency around the use of certificates and related claims would be important, including clear disclosure that supported activities contribute towards EU and Member State climate targets, though not in the form of offsetting or compensation claims, nor as a flexibility mechanism for achieving national targets, such as LULUCF.

### **Should the EU Buyers' Club have an explicit collective ambition level?**

An ambition level could help signal market demand and attract project developers.

- No explicit ambition target
- A volume target (expressed in ktCO<sub>2</sub>e or MtCO<sub>2</sub>e)
- A capital deployment target (expressed in €)
- A project pipeline target (number of projects supported)

- A portfolio diversification target

What order of magnitude would be appropriate for this target?

- Exploratory scale (e.g. thousands of tCO<sub>2</sub>e)
- Market-formative scale (e.g. millions of tCO<sub>2</sub>e)
- System-shaping scale (e.g. hundreds of millions of tCO<sub>2</sub>e)

### What form should demand commitment take for Club members?

This determines the level of financial and contractual engagement expected from buyers.

*Use drag&drop or the up/down buttons to change the order or accept the initial order.*

<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> Binding budget commitments
<input type="checkbox"/> Non-binding expression of interest
<input type="checkbox"/> Binding volume commitments

[OPTIONAL] Please specify what other form should demand commitment take for Club members.

Multi-year financing commitments are more appropriate for land-based activities where environmental outcomes can evolve over long timeframes and involve natural variability. The framework should also accommodate different forms of contribution, including support for ecosystem restoration, resilience-building, biodiversity enhancement, rather than on the purchase of quantified carbon units. For example activity-based financing and other public-interest support approaches that reward sustainable land management and ecosystem stewardship without requiring highly granular quantification and commodification of environmental outcomes. This could help encourage broader participation and avoid pressure to generate carbon credits from complex land systems. Any commitment structure should support long-term ecosystem stewardship.

### What sort of knowledge-sharing should be encouraged amongst the Buyers' Club members?

*Select all that are valuable.*

- Price benchmarks and market trends
- Pipeline of CRCF-certified projects (supply overview)
- Best practices for carbon credit claims and communications
- Case studies and buyer experience sharing
- Regulatory updates (CRCF developments, EU taxonomy, corporate reporting)
- MRV and monitoring methodologies
- Carbon market international comparisons
- Other (please specify)

Please specify what other sort of knowledge-sharing should be encouraged amongst the Buyers' Club members.

Knowledge-sharing should prioritise environmental integrity, appropriate claims guidance, lessons learned from existing carbon market experiences, and practical approaches for supporting ecosystem stewardship and resilient land management. Exchange on other forms of voluntary climate finance and broader environmental outcomes beyond carbon alone would also be valuable.

## ACTIVITIES OF THE EU CRCF PURCHASING FACILITY

**Please rate the following functions that an EU CRCF Purchasing Facility could carry out to support the Buyers' Club and to scale-up the CRCF market.**

The Purchasing Facility would be a Commission-led initiative to support the Buyers' Club with more tangible support going beyond coordination, with the aim to maximise the leverage of public resources with a public-private market infrastructure. The Facility would be set up to support Member States in cost-effectively achieving their climate targets.

This section of the survey focuses on the administrative and financial support that the Purchasing Facility could provide to scale-up the EU CRCF market.

	Not important	Important but should <b>not</b> be provided by the Commission	Important and should be provided by the Commission	Very important and should be provided by the Commission
Administrative support to procure carbon credits on behalf of the Buyers' Club (e.g. defining a project assessment grid, launching calls for proposals, selecting project developers, supporting contracting).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative support for carbon farming finance within the value chain for scope-3 reporting purposes (e.g., launching calls for proposals to bring together actors that share a supply chain in a specific landscape or region, selecting projects, supporting contracting)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support with EU or national public funding (e.g. risk sharing mechanisms, subsidies, guarantees)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support to project developers (helping them achieve economic viability, quality)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Please specify what other function an EU CRCF Purchasing Facility could carry out to support the Buyers' Club and to scale-up the CRCF market.

Collaboration within supply chains and landscapes can support more resilient and sustainable land management practices, but the CRCF credits cannot be linked to corporate scope-3 claims or compensation mechanisms. As CRCF activities contribute towards EU and Member State targets and NDCs, the use of associated units for offsetting-type claims would result in claiming the same units twice. Support should instead focus on credible contribution models and broader sustainability objectives. Public funding and risk-sharing mechanisms may provide the most effective and equitable way to support ecosystem restoration, resilient land management, and land-based removals. They provide greater predictability for land managers, lower administrative and MRV costs, avoid excessive liability risks related to reversals, and better account for the multiple functions of land systems beyond CO2 alone. It is unlikely that Member States would rely on CRCF market structures to achieve land-sector mitigation and removals objectives as these outcomes can be delivered more directly and cost-effectively through public support and activity-based financing mechanisms. The creation of additional market layers, including certification systems, intermediaries, contracting structures, and trading arrangements, increases administrative complexity and transaction costs without any added environmental value.

**If the Purchasing Facility organises calls for proposals, what criteria should it use to select projects?**

*Select the top 3 answers*

*Maximum 3 selection(s)*

- Quality and environmental integrity of projects
- Commercial terms (price, volume, delivery timeline)
- Financial viability of project developers
- First-come, first-served approach
- Geographic diversity
- Innovation / technological novelty
- Other (please specify)

Please specify what other criteria the Purchasing Facility should use to select projects, if it organises calls for proposals.

Project selection should prioritise long-term environmental integrity and broader ecosystem outcomes rather than optimising for low-cost carbon volumes. Criteria should recognise the multiple functions of land systems, including biodiversity, resilience and adaptation.

**If the Purchasing Facility organises calls for proposals, how should these be structured?**

*Select all approaches that seem appropriate.*

- Separate rounds for nature-based vs. technology-based projects
- Separate rounds for carbon removal vs. emission reduction projects
- Portfolio-based approach (bundling different project types)

- Open / continuous purchasing window (no defined rounds)
- Other (please specify)

Please specify which other approach the Purchasing Facility should consider for the structure of the calls for proposals.

Different categories of activities should not be treated as interchangeable. Nature-based and technological approaches, and removals and emission reductions, involve fundamentally different characteristics in terms of permanence, reversibility, MRV, environmental risks, co-benefits, and policy objectives. Separate structures are needed for appropriate assessment criteria, safeguards, and financing.

**Public financial support: Which risk-sharing mechanisms should the Purchasing Facility offer?**

Rank the following instruments by order of preference.

Use drag&drop or the up/down buttons to change the order or accept the initial order.

- ⋮ Other (please specify)
- ⋮ **Price subsidy** (the Purchasing Facility pays a fixed premium or covers part of the price gap to make projects viable)
- ⋮ **First-loss guarantee** (the Purchasing Facility partially compensates buyers if credits are not delivered at contract execution)
- ⋮ **Purchase option / buyback mechanism** (the Purchasing Facility offers to buy back credits buyers ultimately do not want on long-term contracts)
- ⋮ **Buffer pool / replacement guarantee** (if a project fails to deliver, the Purchasing Facility compensates with equivalent replacement credits)

[OPTIONAL] Please specify what other risk-sharing mechanisms the Purchasing Facility should offer.

Our preferred approach would be direct long-term activity-based support and ecosystem stewardship payments that provide predictable financing for ecosystem restoration, resilient land management, biodiversity protection, and enhancement of carbon stocks, independently of tradable credit generation. Such approaches can reduce administrative complexity, avoid excessive reliance on uncertain carbon quantification, and better reflect the multiple functions of land systems beyond carbon outcomes alone. Among the proposed mechanisms, price subsidies may be more appropriate than complex market-based instruments, as they can help support project viability in a more transparent and predictable way. By contrast, mechanisms such as buyback arrangements, buffer pools, and replacement guarantees risk adding further layers of financial and administrative complexity around inherently uncertain and reversible land-based carbon outcomes. More broadly, public support should prioritise delivering real ecosystem and climate benefits cost-effectively, rather than primarily stabilising or scaling secondary carbon market structures.

**What type of support should the Purchasing Facility provide to project developers?**

Select the top 3 answers.

Maximum 3 selection(s)

- Technical assistance (MRV guidance, methodology support)
- Capacity building (training, peer learning networks)
- Financial bridging (advance payments, upfront capital)
- Market access facilitation (matchmaking with buyers)
- Certification support (CRCF application guidance)
- Other (please specify)
- No support needed

Please specify what other type of support the Purchasing Facility should provide to project developers.

Support should prioritise helping land managers and project developers implement high-quality ecosystem and land management practices in a practical and accessible way. Capacity building, technical assistance, and predictable upfront financing may often provide greater value than support primarily focused on expanding carbon market participation.

## CONCLUSION & STRATEGIC ASSESSMENT

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**Are there other activities or mechanisms not covered in this survey that should be considered for the design of the Buyers' Club and/or the Purchasing Facility?**

The core question for the design of the Buyers' Club and Purchasing Facility is whether complex market-based CRCF structures are the most effective way to deliver land-sector climate and ecosystem objectives. Activity-based finance can provide a simpler, more predictable, and more cost-effective way to support ecosystem restoration, resilient land management, biodiversity enhancement, and the protection of carbon stocks, without creating additional layers of certification, intermediaries, and carbon market infrastructure. The design of the Buyers' Club should therefore avoid reinforcing offsetting logics or creating inappropriate equivalences between fundamentally different mitigation activities and carbon outcomes. As CRCF activities contribute towards EU and Member State climate targets and NDCs, associated units cannot be used for offsetting or compensation claims by private actors.

**In your view, is there a need for EU intervention to ensure a viable market for CRCF units?**

This helps assess the perceived need for public intervention.

- No – the market will develop on its own without EU support
- Partially – some targeted EU support could accelerate, but is not strictly necessary
- Yes – EU support is essential to develop the CRCF market
- I don't have a strong view

**What type of EU support is needed to scale up the EU carbon farming market?**

- EU support is not necessary
- EU support is necessary, but an EU Buyers' Club or a CRCF Purchasing Facility are not the right instrument
- EU support is necessary, and an EU Buyers' Club alone is sufficient

- EU support is necessary, and an EU Buyers' Club needs to be complemented by a Purchasing Facility
- I don't know

[OPTIONAL] Please provide additional context about your position on the EU support needed to scale up the EU carbon farming market.

**Do you have any other comments, recommendations, or concerns?**

When it comes to land-based climate action, policy development must not be driven primarily by the logic of carbon commodity market creation. Land systems deliver multiple functions beyond carbon outcomes alone, including biodiversity protection, ecosystem resilience, water regulation, adaptation, and food production. Financing approaches should therefore reflect these broader objectives and avoid creating inappropriate equivalences between fundamentally different mitigation activities and carbon outcomes. The Commission should also carefully assess where market-based CRCF approaches provide genuine added value compared to more direct public and activity-based support mechanisms.

A voluntary carbon market approach will not deliver the scale of change needed and cannot replace regulation (i.e. a climate target for the agriculture sector) and a reform of the EU's agricultural subsidies. This policy development misses the urgency of the moment, trying to get farmers on board with an inherently complex system that leaves many questions about practical implementation as well as integrity unanswered, while only being able to add tweaks in the system. Investing in such a system, which increases the risk of disappointment for farmers, which will in turn diminish their willingness to engage in other programmes in the future. A good example of this is the collapse of the Chicago Climate Exchange in 2010, which resulted in farmers being understandably wary of carbon market mechanisms.

Clear guidance will also be important to ensure that private actors are not misled regarding appropriate use cases and claims associated with CRCF units. As CRCF activities contribute towards EU and Member State climate targets and NDCs, the CRCF units cannot be used for offsetting or compensation claims by private actors.

We would also like to draw the Commission's attention to ongoing concerns regarding the robustness and environmental integrity of CRCF methodologies, including issues related to additionality, leakage, uncertainty treatment, monitoring flexibility, and permanence provisions. These concerns have recently been highlighted in analyses by Oeko-Institut comparing the CRCF methodologies with broader integrity principles and the requirements of the Article 6.4 Paris Agreement Crediting Mechanism (PACM):

<https://www.oeko.de/en/publications/is-the-crcf-carbon-farming-delegated-act-fit-for-purpose-analysis-of-requirements-and-comparison-with-the-pacm/>

<https://www.oeko.de/en/publications/does-the-crcf-methodology-for-permanent-removals-align-with-the-pacm/>

In addition, the management of permanence and reversals in temporary land-based carbon storage remains particularly challenging in practice, especially where liability risks may ultimately fall on land managers and smaller actors. These issues are further discussed here:

<https://www.ecologic.eu/sites/default/files/publication/2026/Temporary-carbon-units-carbon-farming-EU-agri-food-climate-policy-50216.pdf#page=67>

**Would you be willing to be contacted for a follow-up interview, or future stakeholder engagement activities?**

- Yes
- No

Please provide your email address.

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## **Contact**

[Contact Form](#)