

# Building compliance- ready CDR portfolios

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A guide for corporate buyers  
navigating the future landscape



## Introduction

# Policy is the market signal

Carbon removal markets are no longer moving in lockstep. In the U.S., political volatility has shaken confidence in long-term demand, even as tax credits and subsidies boost supply. In Europe, the picture is clearer: policymakers are building compliance pathways that will directly shape which credits count, how prices evolve, and where capital flows.

These frameworks will determine the future value of the credits you hold, and whether your portfolio is seen as credible in the eyes of regulators, auditors, and investors.

The companies preparing now, aligning procurement strategies with UK and EU frameworks, will set the benchmark for quality and secure supply at more favorable prices. Late movers will pay a premium for what's left—or be locked out entirely.

# The UK and EU are building compliance-ready markets

While U.S. policy support is gradually dismantled, Europe is laying down the scaffolding for a compliance-driven carbon removal market.

## EUROPEAN UNION



In the EU, the Carbon Removals Certification Framework (CRCF) is the foundation for integrating durable removal methods into the EU Emissions Trading System (ETS). Once in place, it creates a pathway for high-quality credits—such as biochar, BECCS, and DAC—to be recognized alongside allowances.

## UNITED KINGDOM



The UK is moving in the same direction. Removal is expected to be formally integrated into the UK ETS, and projects are already negotiating directly with the government: Evero's BECCS facility, with a potential 217,000 tonnes per year, is one example of early state-backed momentum. Pilot programs are treating the voluntary market as a proving ground for compliance readiness.

The two systems may not remain separate for long. The Danish EU presidency has signaled a push to begin talks on linking the EU ETS and UK ETS as quickly as possible. That political momentum suggests policy convergence is accelerating, not just developing in parallel.

The net effect is clear: credits purchased today in the UK or EU could carry future compliance value. New mechanisms like 15-year Contracts for Difference and upfront capital grants are making projects more financeable. Public funding can seed the first generation of facilities, but only private buyers turn those seeds into scalable supply. Those who move early will not only secure compliance-ready credits—and avoid scrambling for eligibility later—but also help shape a market that can meet their future demand.

# What this means for buyers

The voluntary market mindset—buying offsets to signal climate action—is no longer enough. Under the UK and EU frameworks, carbon removal is poised to become a regulated commodity. That demands a different approach.

01

## Think compliance-first

Buy as if the rules are already in place. Regulators will expect clear documentation, robust monitoring and verification, and audit-ready records. Credits that can't stand up to scrutiny will carry reputational and regulatory risk.



02

## Hedge geographically

If your portfolio is concentrated in the U.S., you're exposed to political whiplash. Diversifying into EU and UK supply hedges against policy volatility and secures access to markets where regulatory demand is growing.



03

## Prioritize permanence

Compliance systems will privilege credits that store carbon for centuries, not decades. Buyers should tilt toward methods that have strong permanence profiles and are backed by rigorous MRV.



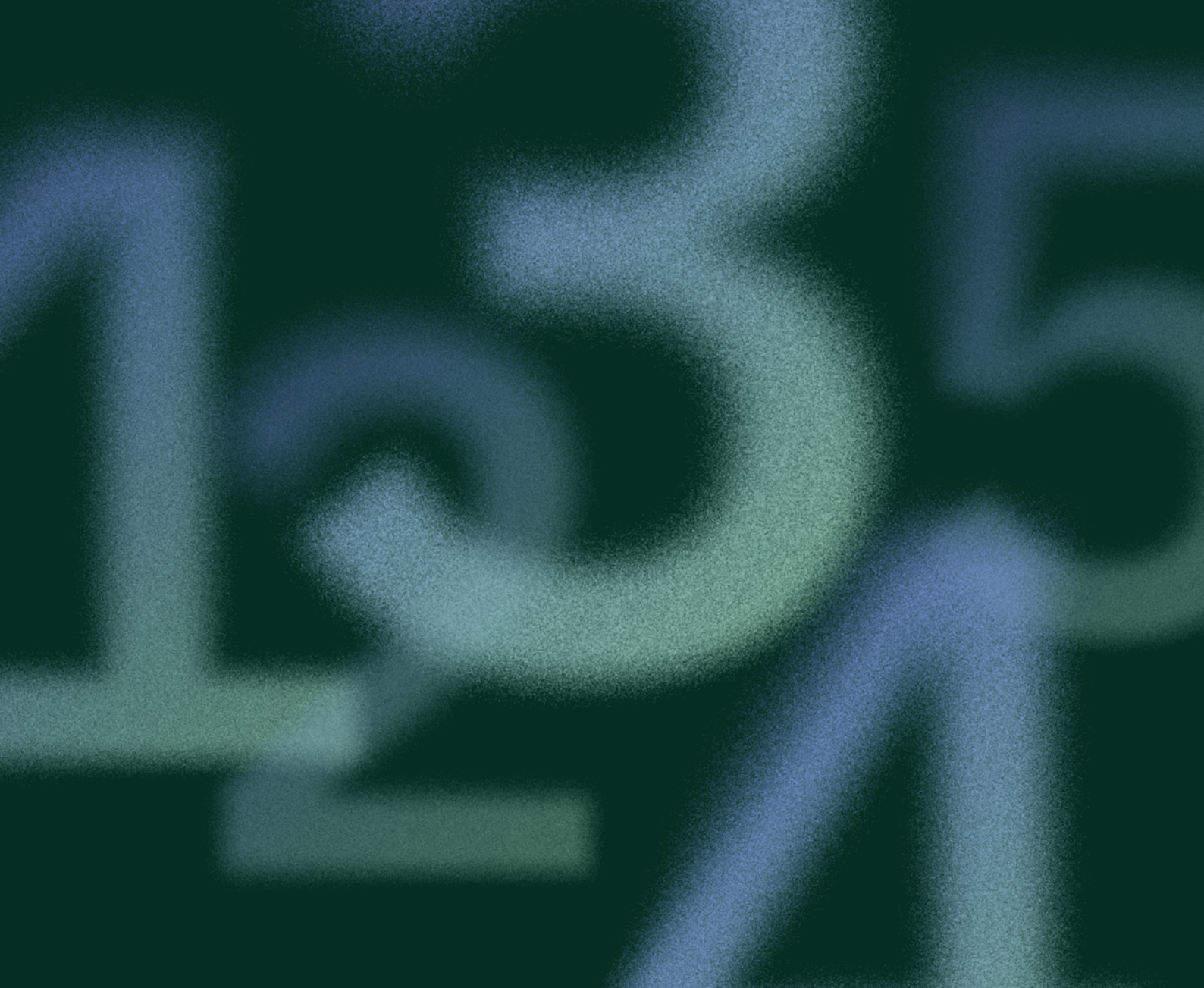
04

## Look at co-benefits strategically

European frameworks are leaning toward credits that deliver measurable social and biodiversity gains alongside carbon. That means projects with transparent co-benefits—such as biochar with soil health impacts—could command greater recognition and value in future compliance systems.







# Practical steps to build a compliance-ready portfolio

Compliance frameworks are moving fast, and buyers don't have the luxury of waiting for perfect clarity. The playbook is already visible: act early, diversify your approach, and buy as if regulators are watching. Here's how to structure a portfolio that will hold value as UK and EU rules come into force.

Go

1

## Secure compliance-grade credits early

Supply of the highest-quality carbon removal will be the first to tighten as UK and EU frameworks take shape. Early procurement locks in access and helps you avoid paying a premium later.

2

## Balance your purchase types

A resilient portfolio uses a mix of contract structures:

- **Offtakes:** Lock in bulk volumes at lower, predictable prices. Give suppliers the certainty they need to build capacity and scale the market.
- **Spot purchases:** Maintain flexibility and top up smaller volumes. Limit to 5–10% of your total strategy.

3

## Run due diligence through a compliance lens

Additionality, permanence, leakage, and delivery risk aren't box-ticking exercises—they're the criteria regulators will use to decide what counts. Ensure every purchase can withstand an audit.

4

## Plan for sector-specific rules

Importers and manufacturers, in particular, need to watch how carbon removal interacts with the EU and UK Carbon Border Adjustment Mechanism (CBAM). Aligning procurement now with CBAM's accounting guidance will prevent last-minute compliance gaps.

5

## Build relationships with credible suppliers

Credibility is currency. Establishing long-term relationships with vetted suppliers today means better access to volume, more influence over contract terms, and stronger positioning as demand grows.



# Buyer's checklist: Ready for the new landscape?

Run your portfolio  
against these  
five questions:

**Have you allocated the majority  
of your portfolio to offtakes?**

YES

NO

☐☐

If not, you may be overexposed to volatile  
spot prices and supply shortages.

**Do your contracts include delivery  
and audit clauses strong enough  
for compliance use?**

YES

NO

☐☐

Regulators will expect  
audit-ready documentation.

**Are you diversified across regions,  
methods, and vintages?**

YES

NO

☐☐

A single-method or single-market strategy  
leaves you vulnerable to policy shifts.

**Do you have a clear line of sight  
on regulatory eligibility?**

YES

NO

☐☐

Can you demonstrate how your credits  
align with the EU CRCF, UK ETS pilots,  
or other emerging rules?

**Can you prove co-benefits and  
robust MRV if challenged?**

YES

NO

☐☐

Social and biodiversity impacts, plus  
strong monitoring and verification,  
will add weight under EU classifications.

If you can't confidently answer "yes" to each, your portfolio may not  
be prepared for the compliance era.

## Conclusion

# The strategic edge of acting now

Carbon removal is shifting from a voluntary market experiment to a compliance-shaped commodity. That means access, eligibility, and price are about to be redefined by policy.

Buyers who act now will lock in three advantages:

01

**Access to trusted suppliers** before supply tightens



02

**Lower entry prices** by securing long-term contracts today



03

**Portfolios with compliance value** that stand up to regulators, auditors, and investors



Those who wait will face higher costs, fewer options, and the risk of being shut out of a market that's moving fast toward regulation. Supercritical helps buyers move with confidence—so they can buy early, build globally, and structure their portfolio as if the rules are already here.





## Supercritical: access the carbon removal market with confidence

Supercritical is the gateway to the carbon removal market. One-third of corporate buyers, including The Economist, Virgin Atlantic, and Rothschild & Co use Supercritical's marketplace to navigate the market, build portfolios of high-quality vetted projects, and securely transact across spot purchases and offtake agreements. Supercritical is the marketplace of choice for visionary companies with ambitious climate goals that need to be met today, not decades from now.

[Request access to the Supercritical marketplace](#)

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