

# <sup>1</sup> Closing the carbon removal attribution gap requires an <sup>2</sup> objective atmospheric basis

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## <sup>13</sup> Science for Society

<sup>14</sup> Achieving the goals of the Paris Agreement depends not only on deploying carbon dioxide  
<sup>15</sup> removal (CDR), but on the accounting infrastructure used to define and track its climate  
<sup>16</sup> impact. Today, removals are increasingly credited through project-based markets that op-  
<sup>17</sup> erate independently from other systems and without explicit linkages to the atmospheric  
<sup>18</sup> carbon balance. This decoupling risks an “attribution gap,” where credited removals coexist  
<sup>19</sup> with uncounted emissions, potentially distorting international climate targets and weakening  
<sup>20</sup> incentives to decarbonize hard-to-abate sectors.

<sup>21</sup> We introduce an Objective Atmospheric Basis (OAB): a shared accounting infrastruc-  
<sup>22</sup> ture that tracks emissions and removals using physical carbon balances and two-column  
<sup>23</sup> environmental ledgers. Rather than defining policy outcomes, OAB provides a neutral data  
<sup>24</sup> interpretation layer that can be used across carbon markets, national inventories, and Article  
<sup>25</sup> 6 cooperation mechanisms. Applied to biochar carbon removal, it shows that upstream  
<sup>26</sup> emissions can determine whether a project delivers net removal or emissions reductions. Inte-  
<sup>27</sup> grating this accounting layer with net-zero target design, crediting rules under Article 6, and  
<sup>28</sup> economic incentives for industry could help ensure that carbon markets complement—but  
<sup>29</sup> not replace—direct emissions reductions, while avoiding atmospheric debt shifting.

## <sup>30</sup> Highlights

- <sup>31</sup> • Current carbon removal accounting infrastructure creates attribution gaps, where re-  
<sup>32</sup> movals are credited while associated emissions remain in the atmosphere.
- <sup>33</sup> • We introduce an Objective Atmospheric Basis (OAB) that tracks carbon explicitly  
<sup>34</sup> using mass balance, treating emissions as persistent liabilities and removals as assets.

35     ● Applying OAB to biochar shows that upstream emissions allocation often determines  
36     net climate impact, with some residue-based systems shifting emissions burdens rather  
37     than delivering removals.

38     ● OAB functions as accounting infrastructure that enables consistent interpretation of  
39     carbon fluxes across projects, national inventories, and Paris Agreement Article 6 mech-  
40     anisms.

41     **Summary**

42     Efforts to integrate carbon dioxide removal (CDR) into climate policy, markets, and  
43     inventories are advancing rapidly, but without a unified accounting logic to attribute atmo-  
44     spheric impacts. Existing crediting approaches omit upstream emissions, creating a struc-  
45     tural *attribution gap* in which removals are credited even as associated emissions remain in  
46     the atmosphere. Although it remains small today, we find that this gap could reach gigaton-  
47     scale annually in biomass-based CDR systems. To address this discrepancy, we propose  
48     an Objective Atmospheric Basis (OAB): a technology-agnostic accounting framework that  
49     tracks carbon transfers explicitly using mass-balance ledger that casts emissions as persistent  
50     liabilities and removals as assets. Applied to feedstock materials for biochar carbon removal  
51     (BCR), OAB reveals how system boundaries and emissions allocation decisions shape net re-  
52     moval outcomes. By reconciling emissions and removals within a single atmospheric reference  
53     frame, OAB closes the attribution gap and provides core infrastructure for scalable, high-  
54     integrity CDR. As a common language for carbon bookkeeping grounded in physical fluxes,  
55     OAB enables consistent crediting across jurisdictions, supports policy decision-making, and  
56     strengthens alignment between Article 6 implementation and global temperature goals.

57     **Introduction**

58     Limiting warming to 1.5°C will require 100–300 GtCO<sub>2</sub>e of cumulative carbon dioxide re-  
59     moval (CDR) by 2100, an ambition grounded in science-based net-zero targets<sup>1,2</sup> and codified  
60     in the Paris Agreement.<sup>3,4</sup> Article 6 of the Agreement establishes a framework for interna-  
61     tional cooperation, enabling countries to meet their nationally determined contributions  
62     (NDCs) through bilateral trading (Article 6.2) and a centralized crediting mechanism (Arti-  
63     cle 6.4). To date, 78% of countries anticipate using these mechanisms, with CDR expected  
64     to contribute up to 3.5 GtCO<sub>2</sub>e by 2030.<sup>5,6</sup>

65     Yet the climate impact of these pledges will depend not only on the volume of removal  
66     credits delivered, but also on the quality of the accounting infrastructure that defines, verifies,  
67     and transfers atmospheric mitigation outcomes.<sup>7,8</sup> Current systems credit removals without a  
68     direct linkage to the atmospheric carbon balance, enabling crediting outcomes to drift from  
69     the physical carbon flows they are meant to represent—a structural divergence we term

70 the *attribution gap*. As CDR scales, this gap could propagate across international market  
71 systems, eroding the atmospheric integrity of the Paris framework and undermining global  
72 efforts to fight climate change.<sup>9</sup>

73 Historical experience illustrates how accounting infrastructure can shape the relation-  
74 ship between credited and atmospheric impact. Under the Clean Development Mechanism  
75 (CDM)—a system built to facilitate cost-effective emissions reductions and avoidances—  
76 credit issuance relies on unverifiable additionality tests, arbitrary baselines, and flexible  
77 system boundaries. Although CDM methodologies have evolved, accounting reflects mod-  
78 eled scenarios rather than realized atmospheric impacts:<sup>10–14</sup> despite more than \$400 billion  
79 invested,<sup>15</sup> a recent systematic review found that fewer than 16% of examined offset credits  
80 minted under the CDM and other programs delivered real emission reductions.<sup>16</sup> This ex-  
81 perience demonstrates a broader structural lesson: without a clear reference frame anchored  
82 to the atmospheric carbon balance, accounting architectures cannot guarantee alignment  
83 between credited and physical outcomes.

84 Contemporary CDR crediting systems risk repeating this structural flaw. Many programs  
85 retain project-based architectures developed for emissions avoidance,<sup>17–22</sup> even as removals  
86 are expected to scale far beyond historical markets and perform distinct functions in net-zero  
87 pathways.<sup>23,24</sup> Additionality tests and counterfactual logic—*intrinsic* to emissions avoidance  
88 and reduction schemes<sup>25</sup>—sit uneasily with removals, which can in principle be quantified  
89 directly through observable carbon fluxes. Jurisdictional and programmatic fragmentation  
90 further embeds incompatible system boundaries and normative choices into core accounting  
91 rules.<sup>21,22,26,27</sup> Together, these features impede comparability across contexts and obscure  
92 what constitutes atmospheric CO<sub>2</sub> removal,<sup>2,28–36</sup> creating and widening the attribution gap  
93 as CDR scales.

94 Addressing the attribution gap requires a foundational reference frame that consistently  
95 links project-level data to the atmospheric carbon mass balance. We propose an objective  
96 atmospheric basis (OAB) for CDR accounting: a physically grounded accounting layer that  
97 records carbon fluxes using a ledger-based architecture analogous to financial accounting  
98 (Box 1). Under OAB, positive greenhouse gas (GHG) fluxes (emissions) and negative fluxes  
99 (removals) are treated as additive inverse liability-asset pairs traced across process stages.  
100 This structure separates objective, measurement-based accounting from normative crediting  
101 decisions, enabling regulators, crediting programs, and market participants to apply differ-  
102 ent governance choices without obscuring underlying atmospheric impacts. By providing a  
103 consistent foundation on which disparate actors and policies can operate, OAB links empir-  
104 ical carbon data to transparent, interoperable decision frameworks and provides a pathway  
105 toward convergent accounting under Article 6.

106 In the sections that follow, we situate OAB within the evolution of carbon accounting  
107 architectures and apply it to biochar carbon removal (BCR), a dominant pathway in today's  
108 engineered CDR portfolio. We then evaluate how an OAB architecture could prevent at-  
109 tribution gaps, balance mitigation incentives, and strengthen the implementation of Article  
110 6.

#### Box 1: Accounting for removals with an Objective Atmospheric Basis

An effective carbon removal accounting infrastructure should use an environmental ledger to track atmospheric carbon flux, apply consistent and fair allocation rules, and apply equally across all CDR pathways:

- (1) **Anchor in atmospheric mass balance:** All system boundaries are defined relative to atmospheric carbon. Only with an atmospheric reference frame can atmospheric removal be inferred.
- (2) **Consistently allocate upstream emissions:** Ensure consistent allocation of upstream emissions in multifunctional systems using a distribution coefficient,  $q^*$ , that assigns burdens across co-products.
- (3) **Track carbon explicitly:** Record carbon flux as a physical transfer using environmental ledgers.
- (4) **Track emissions and removals as durable ledger entries:** Adopt a technology and policy-agnostic representation of carbon fluxes across the whole process value chain. Assets and liabilities represent additive inverse pairs.
- (5) **Enable dynamic permanence tracking:** Perform liability retention and rebalancing when storage is lost or degraded. Require re-evaluation of storage inventories at appropriate intervals.

111

#### 112 *Evolution and Limitations of Carbon Accounting Architectures*

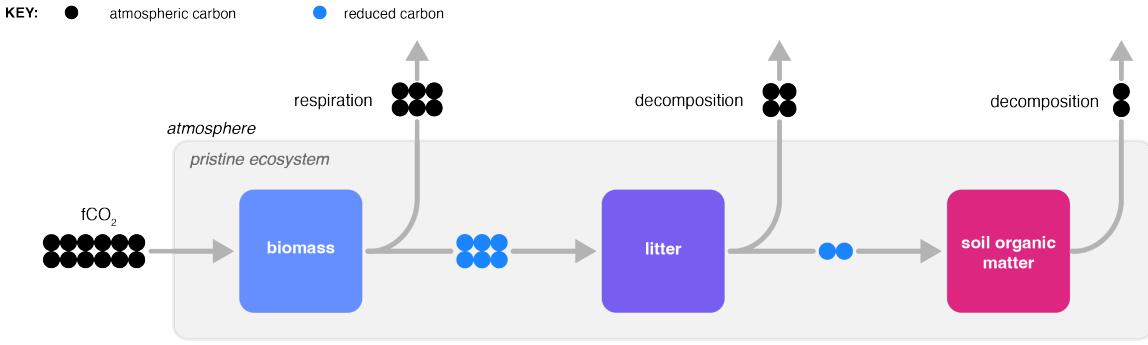
113 As Article 6 links accounting systems across contexts and scales, inconsistencies among  
114 them magnify risks of misrepresentation and create administrative barriers to international  
115 trade.<sup>23,37,38</sup> Project-level crediting approaches remain methodologically fragmented and of-  
116 ten fail to distinguish emissions reductions from removals,<sup>27,32,39-42</sup> rendering them poorly  
117 aligned with jurisdictional and national frameworks. Those higher-level systems likewise rely  
118 on additionality tests and baseline logic but typically operate on aggregated observational  
119 data with limited project-level specificity.<sup>3,37</sup> At the planetary scale, integrated assessment  
120 and Earth system models represent mitigation explicitly as physical carbon flows.<sup>3,43</sup> These  
121 layers cannot converge without a unifying reference frame; just as financial accounting de-  
122 pends on standardized rules to ensure interoperability, carbon accounting must function as  
123 a shared infrastructure across scales.<sup>2,42,44,45</sup> Nested architectures, where project data aggre-  
124 gates cleanly into jurisdictional and global assessments, are only feasible if all scales draw  
125 on neutrally defined flux units.<sup>38</sup>

126 A common, interoperable basis linking project-level carbon fluxes to atmospheric out-  
127 comes provides this neutral foundation.<sup>3,43</sup> Carbon accounting now spans diverse institutions  
128 and objectives—from project crediting to policymaking and national inventory management.  
129 While different objectives may necessitate different *interpretations*,<sup>26,27,46</sup> the *practice* of ac-  
130 counting should consistently represent material carbon flows. Flux-based accounting ac-  
131 complishes this by selecting and interpreting the subset of observable greenhouse gas flows  
132 attributable to a CDR project<sup>10</sup> Life cycle assessment (LCA) has formalized such logic  
133 through “cradle-to-grave” inventories, yet LCA was not designed for CDR and leaves wide  
134 discretion over system boundaries, treatment of multi-functional processes, and the classifi-  
135 cation of emissions reductions versus removals.<sup>10,39,47,48</sup> Standards that permit “zero-burden”  
136 treatment (i.e., no upstream emissions allocation) of “waste” feedstocks further distort flux  
137 logic and undermine efforts to distinguish emissions reductions from true CDR<sup>10,49–55</sup>.

138 These inconsistencies are especially acute in biomass-based systems, which sit at the  
139 intersection of LCA conventions, feedstock classifications, and upstream allocation. A re-  
140 cent review of 36 distinct biochar deployments found that project impacts determined with  
141 LCA methods could not be reliably intercompared due to inconsistent boundary conditions,  
142 functional units, and other parameters.<sup>56</sup> At roughly 1 tCO<sub>2</sub>e of embodied emissions per  
143 tonne of biomass carbon produced,<sup>57–59</sup> full mobilization of sustainably harvestable crop  
144 residues in such systems without proper attribution could bias global CDR balances by  
145 nearly 1.4 GtCO<sub>2</sub>e annually.<sup>60</sup> Such distortions illustrate how inconsistencies in account-  
146 ing infrastructure—rather than performance of individual CDR pathways—can propagate  
147 substantial attribution gaps at scale.

## 148 **Analytical framework and allocation methodology**

149 A carbon accounting architecture capable of preventing attribution gaps should operate  
150 from a common atmospheric reference frame and represent both mitigation and ownership  
151 through empirically grounded carbon transfers. OAB meets these requirements by tracking  
152 carbon explicitly through mass-balance principles implemented in a two-column ledger sys-  
153 tem. To illustrate how OAB links physical fluxes to ownership and liability, we apply the  
154 framework to a gradient of biomass-based systems—from pristine ecosystems to intensively  
155 managed croplands and biochar production—and show how the architecture preserves causal  
156 correspondence between carbon flows and CDR claims.



**Figure 1:** Molar flux of carbon in pristine ecosystems, where the influx of atmospheric carbon ( $f\text{CO}_2$ ) is in balance with efflux of carbon via soil respiration from roots and heterotrophic organisms. Note that half of the influx of carbon from the atmosphere is immediately respired by plants such that photosynthesis is roughly 50% efficient.<sup>62</sup> Decomposition from successively slower-cycling pools (i.e., litter, soil organic matter) balances the remaining carbon to yield a system at equilibrium.

157 *Pristine and unmanaged ecosystems*

158 Pristine, undisturbed, and unmanaged ecosystems define the null removal case. Although  
 159 they exchange carbon continuously with the atmosphere, their carbon inventory remains  
 160 nominally at steady-state: atmospheric carbon uptake by plant biomass ( $f\text{CO}_2$ ) is balanced  
 161 by biogenic carbon emissions from soil respiration and decomposition.<sup>61</sup> This equilibrium  
 162 yields a constant ecosystem carbon reservoir ( $C(t)$ ) with no net carbon storage over time  
 163 (Fig. 1).

164 Under OAB, carbon removed from the atmosphere and stored in a reservoir is designated  
 165 as an asset, while any subsequent release of oxidized carbon back to the atmosphere consti-  
 166 tutes a liability. Systems at steady-state generate neither assets nor liabilities, indicated by  
 167 a storage rate of zero,

$$\frac{dC}{dt} = \dot{C}_{\text{in}} - kC = 0 \quad (1)$$

168 where  $\dot{C}_{\text{in}}$  is the mass flux of carbon into the system and  $k$  is the system loss coefficient. Al-  
 169 though these ecosystems may display substantial carbon stocks ( $C(t) \gg 0$ ) and fluxes, mass  
 170 accumulation may have occurred long ago, constituting no additional removal. Accordingly,  
 171 fluxes in these systems are not creditable.

172 Some pristine ecosystems may temporarily accrue carbon (i.e.,  $dC/dt > 0$ ) due to  
 173  $\text{CO}_2$  fertilization, enhanced precipitation, or temperature changes associated with climate  
 174 change.<sup>43</sup> However, these are unmanaged and potentially non-durable gains—and should  
 175 not be recognized as removals on an environmental ledger without additional intervention  
 176 and assumed oversight.<sup>45</sup> Including passive sinks in net-zero claims also obscures national  
 177 inventory and target setting, thereby undermining climate change mitigation objectives.<sup>3,43,63</sup>

178 While pristine ecosystems cannot generate new carbon assets, they can still incur liabilities.  
179 Storage reversal can occur in response to wildfire, drought, pestilence, deforestation,  
180 and other disturbances.<sup>64,65</sup> When such reversals occur, the landowner—private or public—  
181 must recognize a carbon liability even in the absence of a prior carbon asset or credited  
182 removal.<sup>45</sup>

183 *Managed ecosystems*

184 In contrast to pristine ecosystems, managed ecosystems and croplands introduce intentional  
185 and deliberate intervention that disrupts the carbon balance, creating measurable departures  
186 from equilibrium that enable assets and liabilities to be established (Fig. 2). Carbon fluxes  
187 here encompass both biological processes, including non-CO<sub>2</sub> GHGs (e.g., N<sub>2</sub>O and CH<sub>4</sub>),  
188 and emissions resulting from material inputs (e.g., seedling production and planting, fertilizer  
189 usage, tillage, harvesting).<sup>66</sup> Under OAB, these systems are modeled with the following  
190 dynamic mass balance:

$$\frac{dC}{dt} = \sum_i A_i - \sum_j L_j = \sum_i A_i - kC - \sum_j E_j \quad (2)$$

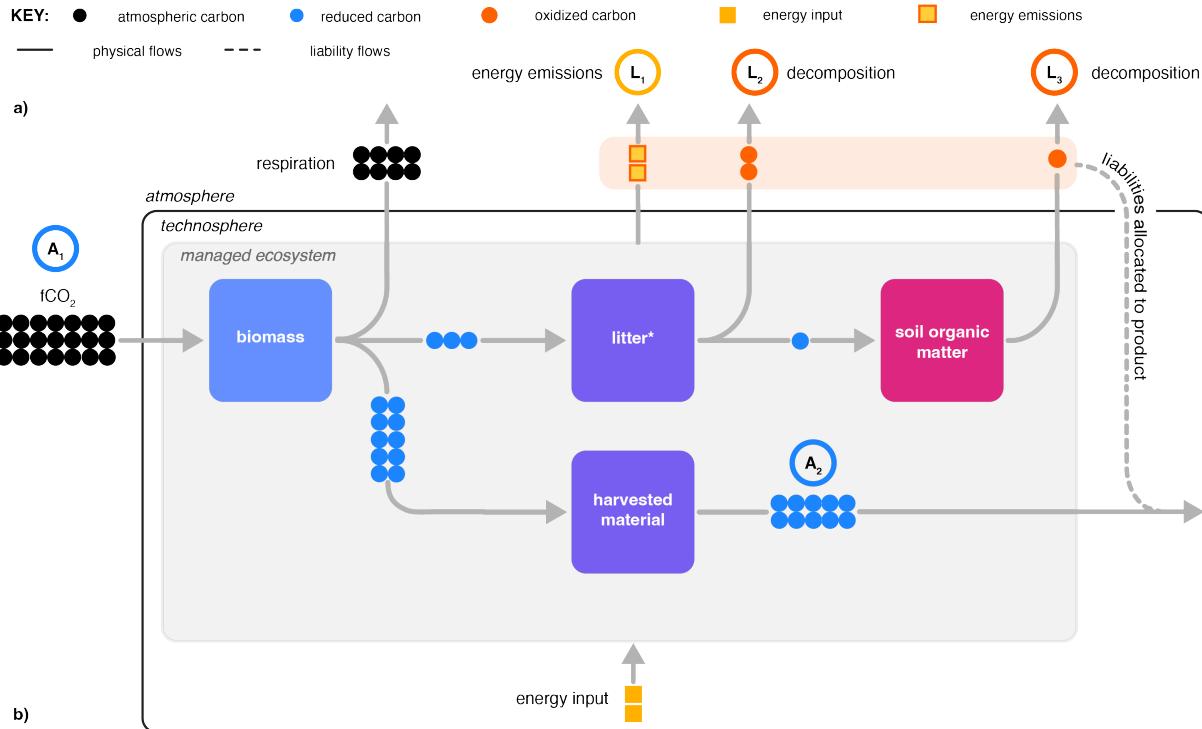
191 where  $\sum_i A_i$  represents the carbon added to storage as assets, and  $\sum_j L_j$  is the sum of  
192 liability fluxes resulting from system feedbacks ( $kC$ ) and technospheric emissions ( $\sum E_j$ ).  
193 Although system energy inputs are not directly tracked as liabilities, the associated emissions  
194 ( $E_j$ ) are. Under this framework, carbon assets ( $A_i$ ) can be generated and transferred, while  
195 liabilities persist and must be rebalanced if storage degrades. In principle, these systems  
196 may also inherit upstream liabilities from infrastructure establishment and raw material  
197 production. For simplicity, these liabilities are not considered here.

198 The resulting environmental ledger (Fig. 2b) links the biophysical mass balance (Fig.  
199 2b) to ownership transfers: photosynthesis generates assets, in-system emissions create li-  
200 abilities, and both are assigned to harvested biomass at the point of sale.<sup>44</sup> Each subsequent  
201 transaction carries its carbon value with it to enable traceable responsibility through the  
202 supply chain.

203 The OAB framework thus achieves two objectives:

- 204 1. **Accountability:** the land manager's closing balance, and
- 205 2. **Asset quantification:** the atmospheric mass balance over the reporting period.

206 Here, a closing balance of zero implies neither additional carbon liability nor remaining  
207 transferable assets. The value of assets passed downstream depends on the removal value of



Assets	Removal Units	Liabilities	Emission Units
Assets directly produced through operations	10	Liabilities directly produced through operations	5
<b>A<sub>1</sub></b> $CO_2$ fixed in biomass	13	<b>L<sub>1</sub></b> cultivation and harvest emissions	2
Impairment of generated assets	(3)	<b>L<sub>2</sub></b> decomposition emissions	2
		<b>L<sub>3</sub></b> decomposition emissions	1
Subtract assets transferred to customers <b>A<sub>2</sub></b>	(10)	Subtract liabilities transferred to customers	(5)
<b>Closing assets</b>	0	<b>Closing liabilities</b>	0

**Figure 2:** a) Semiquantitative representation of carbon flows in managed agricultural systems, where the influx (fCO<sub>2</sub>) and efflux (respiration and decomposition flux) of carbon may no longer balance. Some CO<sub>2</sub> influx is immediately respired due to photosynthetic inefficiency (black dots denoted respiration).<sup>62</sup> The system boundary (gray box) includes technospheric energy inputs (e.g., machinery, water pumping, and fertilizer). Litter\* denotes residues left on field per sustainable harvest guidelines.<sup>67</sup> b) The associated environmental balance sheet: photosynthesis generates assets; in-system GHG and energy-use emissions create liabilities. Assets/liabilities tied to products transfer to end-users at sale (indicated with parentheses). Flows follow a sign convention (in = positive, out = negative) with fictitious, dimensionless units. Supplier liabilities (e.g., liabilities associated with fuel, seeds, equipment) are omitted for simplicity.

208 captured carbon relative to ancillary emissions. While this system mirrors the presentation  
209 of E-assets under the E-liability framework,<sup>45</sup> OAB treats assets as physical fluxes from the  
210 atmosphere to storage without prescribing what constitutes a tradable unit. Under OAB,  
211 asset/liability matching provides a critical test of carbon accountability, with the mass bal-  
212 ance as the central arbiter of integrity according to the process emissions inventory. Managed  
213 systems thus mark the first point where human intervention transforms flux assessment into  
214 verifiable climate accountability, a necessary bridge between biophysical realities and market  
215 governance.

216 *Biochar systems*

217 BCR (>80% of historic engineered carbon removal deliveries<sup>68</sup>) commonly utilizes crop  
218 residues derived from food systems. Under zero-burden accounting rules, cultivation-phase  
219 emissions in food systems are attributed exclusively to primary food products. Residues  
220 enter the biochar production gate burden-free (e.g., Fig. 2,  $L_1$ ,  $L_2$ ,  $L_3$ ) despite their mate-  
221 rial connection to the biomass.<sup>51,55,69–71</sup> Upscaled to biochar carbon removal (BCR) systems,  
222 OAB addresses this distortion via rule-based allocation to restore the causal link between  
223 emissions investment and project-level climate service.

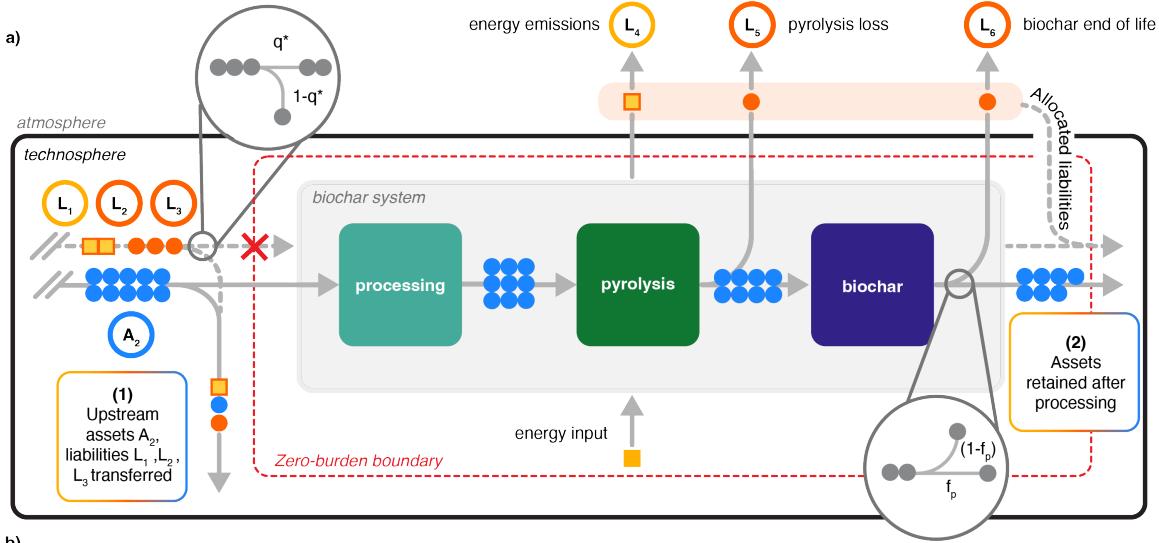
224 *Allocation across co-products*

225 Allocation is the critical step in determining how carbon accountability propagates through  
226 a value chain to result in a system-wide carbon budget. First, OAB tracks and transfers  
227 ledger items from the land manager to the biochar producer. Upstream liabilities are then  
228 partitioned and carried forward, defining clear system boundaries and ensuring net-zero  
229 aligned process emissions assessments (see OAB versus zero-burden inventory in Figure 3a).

230 In practice, once feedstock enters the BCR system, upstream emissions are allocated to  
231 update the biochar producer's environmental ledger, reflecting both net process emissions  
232 and carbon ownership. Net-negativity depends on whether the carbon storage value of  
233 the feedstock exceeds operational and inherited emissions liabilities (Fig. 3b) The closing  
234 balance shows the net position of asset and liability fluxes, yielding one of three possible  
235 outcomes: (1) assets exceed liabilities, resulting in a transferable asset, (2) assets match  
236 liabilities resulting in no outstanding obligations, but no potential removal benefit, or (3)  
237 liabilities exceed assets, leaving the producer with outstanding obligations and no viable  
238 removal assets.

239 Unlike economic allocation, which links emissions to fluctuating market prices, or “zero-  
240 burden” assumptions that admit low-value co-products burden free, OAB introduces a dis-

<sup>241</sup> tribution coefficient ( $q^*$ ) to allocate embodied emissions in proportion to carbon content.  
<sup>242</sup> For example, if an agricultural producer yields primary and secondary biomass products in  
<sup>243</sup> equal mass ratio and carbon content, each stream receives 50% of the production emissions  
<sup>244</sup> (see the supplementary information (SI) for methods). This carbon-based method prevents  
<sup>245</sup> opportunistic partitioning and ensures that even low-value co-products inherit an appro-  
<sup>246</sup> priate share of upstream process emissions. In doing so, OAB ensures that allocation is  
<sup>247</sup> proportional to a product's removal value and reflective of the embedded energy and carbon  
<sup>248</sup> necessary to produce it. This strategy establishes parity across pathways and projects—and  
<sup>249</sup> is an essential element of OAB as a consistent, interoperable accounting architecture.



b)

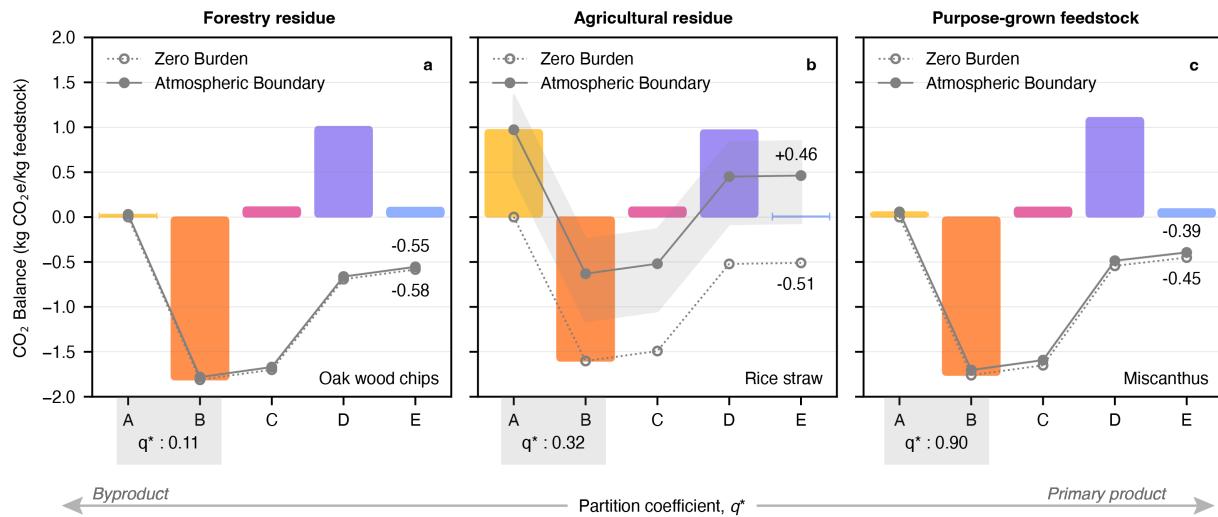
Assets	Removal Units	Liabilities	Emission Units
Add assets acquired from suppliers	9	Add liabilities acquired from suppliers	3
$A_2$ $CO_2$ fixed in biomass	10	$q^* \times L_1$ cultivation and harvest emissions	1
units sold to food/industry	(1)	$q^* \times L_2$ decomposition emissions	1
Impairment of purchased assets	(2)	$q^* \times L_3$ decomposition emissions	1
		Liabilities directly produced through operations	3
		$L_4$ processing and production emissions	1
		$L_5$ pyrolysis loss	1
		$L_6$ decomposition emissions	1
<b>Closing assets</b>	<b>7</b>	<b>Closing liabilities</b>	<b>6</b>

**Figure 3: a)** Carbon fluxes in biochar systems, with (1) upstream assets and liabilities transferred from residue producer (see Fig. 2) to storage operator at purchase according to the emissions partition coefficient ( $q^*$ ). The red dashed “zero burden” boundary excludes upstream liabilities  $L_1$ ,  $L_2$ , and  $L_3$ . Biochar production adds new liabilities but yields net assets that can be sold or retained by the removal operator. Based on current market treatments, biochar’s quality determines its permanence factor ( $f_p$ ), which defines the fraction of carbon expected to remain over 100 years.<sup>72,73</sup> Alternative time-dependent formulations are compatible with the objective atmospheric basis (OAB) to determine the resulting outflow of reduced carbon units (2). See symbol key in Figure 2. **b)** The associated environmental balance sheet: assets from photosynthesis and liabilities generated from upstream processes and biochar pyrolysis. Net removal occurs when assets exceed liabilities.

250 **Upstream burdens determine atmospheric carbon removal**

251 OAB dictates that a CDR claim is valid only when it reflects net atmospheric removal, not  
252 merely carbon storage within a project boundary. Applying OAB allocation to three rep-  
253 resentative BCR feedstocks across five lifecycle stages reveals the extent to which upstream  
254 burdens and allocation choices dictate true removal value (Fig. 4). Among the selected  
255 feedstocks, forestry residues consistently yield net-negative outcomes due to low upstream  
256 burdens and favorable co-product allocation conditions. Agricultural residues, such as paddy  
257 straw, exhibit the greatest potential variability, ranging from marginally net-negative to  
258 strongly net-emitting. Purpose-grown feedstocks also achieve net-negativity, regardless of  
259 upstream burden assumptions, but their ultimate benefit depends on how land-use change is  
260 managed—an issue which remains unaddressed here.<sup>46,74</sup> These results demonstrate that ap-  
261 parent removal can be overstated by an order of magnitude if upstream burdens are ignored.  
262 OAB corrects this distortion by carrying forward embedded liabilities to enable assessment  
263 of net-zero claims.

264 This analysis clarifies three scenarios with distinct implications for CDR claims. Forestry  
265 residues and purpose-grown biomass consistently yield net-negativity under OAB, supporting  
266 their eligibility for use in compensatory CDR markets. In contrast, when biochar is produced  
267 from agricultural residues, inclusion of upstream cultivation emissions can render the process  
268 net-emitting. In these cases, the benefit lies not in generating offset credits, but in re-  
269 balancing upstream liabilities—reducing net emissions in the parent agricultural system and  
270 stimulating broader decarbonization. Applying OAB to rice straw shows that BCR can  
271 reduce emissions liabilities by up to 60% for the rice straw. Given that rice cultivation  
272 contributes nearly half of global agricultural emissions ( $\approx 1$  GtCO<sub>2</sub>e/yr)<sup>75,76</sup> and generates  
273 roughly 0.24 GtC in residues,<sup>60</sup> this reduction represents a significant mitigation opportunity.  
274 However, it should be recognized as emissions reductions within the source system—and not  
275 mischaracterized as independent “offset” removal.



**Figure 4:** CO<sub>2</sub> balance for biochar production at 500°C from a) wood chips (n = 2), b) paddy straw (n = 4), and c) miscanthus x giganteus (n = 2). Bars represent average emissions (positive) or removals (negative) across five lifecycle stages: A, B, C, D, and E indicate cultivation, biomass capture, biomass processing, pyrolysis loss, and biochar end of life, respectively. Gray scatter plots show cumulative sums with and without cultivation burdens (“atmospheric boundary” (OAB treatment) vs. “zero burden”). Shaded regions reflect the range of cumulative outcomes per feedstock. The partition coefficient q\* denotes carbon-based allocation across multifunctional processes. See SI for activity details, product parameters, and q\* calculations.

276 **Global implications of the attribution gap in contemporary CDR  
277 accounting**

278 Misaligned accounting at the project-level—as demonstrated by BCR—can propagate into  
279 a systemic attribution gap when upstream emissions are omitted from crediting boundaries.  
280 Unlike over-crediting (unmet performance) or leakage (spatial displacement), the attribution  
281 gap arises from a structural misalignment of unfit accounting systems—not a technological  
282 failure. High-quality engineered CDR can deliver genuine atmospheric removal—but only if  
283 accounting systems consistently true removals from emissions reductions. CDR, in market  
284 and policy contexts, is a specific activity that requires a dedicated accounting construction.  
285 Each credited removal must be the additive inverse of a quantified emission. Without closure  
286 of this balance, credits license continued emissions rather than neutralize them, driving excess  
287 atmospheric loading.

288 Applying OAB to rice straw systems indicates that attribution gaps may generate excess  
289 atmospheric loading approaching 0.8GtCO<sub>2</sub>e per year<sup>60</sup>—comparable to erasing more than a  
290 decade of progress in U.S. power-sector decarbonization<sup>77</sup>—simply by omitting cultivation-  
291 phase emissions. By reconciling removal and emissions ledgers OAB prevents this hidden

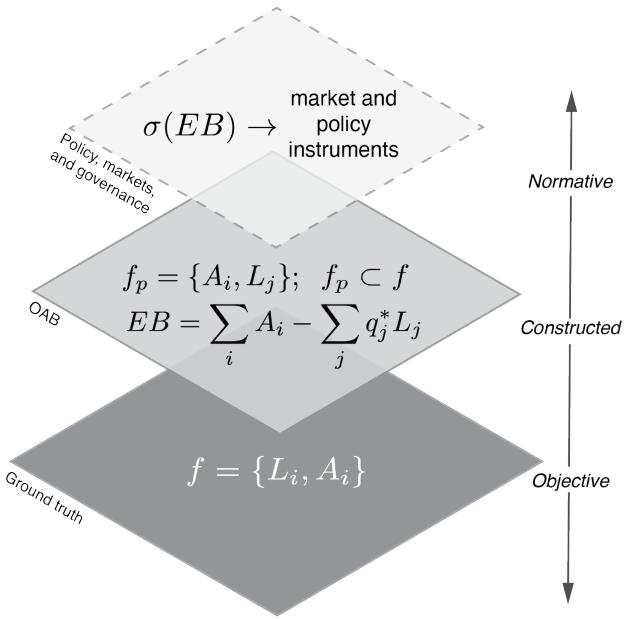
292 atmospheric debt and directs capital toward verified mitigation outcomes. In this way, carbon  
293 accounting functions as core climate infrastructure supporting long-term decarbonization.

294 Fair and systematic comparison across CDR pathways similarly requires the recognition  
295 of embedded burdens under OAB. All pathways require energy and material inputs and  
296 should be assessed accordingly to incentivize high-impact project development.<sup>32</sup> Existing  
297 direct air capture (DAC) crediting rules already require upstream emissions allocation, in-  
298 centivizing low-carbon energy sourcing and off-grid configurations.<sup>78</sup> The same discipline is  
299 needed for biochar, where net emissions outcomes depend strongly on feedstock origin, base-  
300 line disposition, and regional practices.<sup>79</sup> By allocating upstream burdens to proportionally  
301 to CDR value, OAB would strengthen the mitigation contribution of biochar while improv-  
302 ing agricultural emissions outcomes—rewarding higher-integrity deployment and enabling  
303 credible comparison of biochar’s removal value relative to other pathways.

304 These implications extend beyond project integrity to global and intergenerational equity.  
305 Without allocation discipline, unmitigated liabilities remain in host countries, obscuring  
306 mitigation potential and creating future atmospheric debt (*e.g.* residue-derived biochar can  
307 decarbonize rice systems by reducing total emissions by up to 33%). As host countries  
308 design decarbonization strategies aligned with future economic growth, retaining domestic  
309 mitigation potential may be essential to sovereignty. Transacting removals without OAB  
310 risks may exporting benefits while leaving liabilities behind—shifting atmospheric debt to  
311 future generations with potentially severe economic and environmental consequences. OAB  
312 provides an accurate, interoperable accounting framework to re-balance incentives across  
313 crediting and emissions reduction objectives, recognizing the distinct and complementary  
314 roles these activities play in achieving long-term net-zero objectives.

## 315 **Building decision-support infrastructure for markets, policy, and 316 governance**

317 OAB functions as a connective layer linking ground-truth flux data to the normative sys-  
318 tems of crediting, inventories, and governance (Fig. 5). It translates measured carbon  
319 transfers—the most objective layer of the system—into actionable information by identi-  
320 fying the relevant physical flows and applying explicit attribution functions. By design,  
321 OAB avoids subjective constructs such as additionality and baseline setting, preserving both  
322 atmospheric integrity and the flexibility needed to scale across jurisdictions.



**Figure 5:** The Objective Atmospheric Basis (OAB) serves as a message-passing layer between physical atmospheric carbon fluxes and the normative systems of policy, crediting, and governance. The bottom layer represents objective asset and liability fluxes of CO<sub>2</sub> to and from the atmosphere,  $f = \{A_i, L_i\}$ , which exist independent of any accounting system. OAB (middle) selects a project-relevant subset  $f_p \subset f$ , assigns attribution weights  $q_i^*$ , and computes the emissions balance as  $EB = \sum_i A_i - \sum_j q_j^* L_j$ . Decision makers can consume this with their own activation or interpretation function  $\sigma(EB)$  to translate accounting data to markets, inventories, and policy instruments (top). These systems define incentives, eligibility, and credit governance on top of OAB’s physically grounded, end-to-end quantification scheme.

323 By establishing accurate, interoperable accounting foundations and enforcing value chain  
 324 accountability via environmental ledgers, OAB enables policymakers and market stakeholders  
 325 to design incentives, allocate capital efficiently, and communicate outcomes transparently.  
 326 However, the classification of “offset” removals or project-level climate service value remains  
 327 inherently normative.<sup>21,22,26,27</sup> OAB defines net negativity within explicit system boundaries  
 328 that may exclude broader agricultural emissions; in multi-output systems, co-products retain  
 329 liabilities under carbon-based allocation. While alternative allocation strategies are avail-  
 330 able,<sup>54,80</sup> robust accounting requires transparent, reproducible definitions grounded in causal  
 331 alignment to atmospheric outcomes. By allocating emissions in proportion to CDR value,  
 332 OAB provides a reproducible approach while preserving the integrity of atmospheric impact.

333 Operationalizing OAB will require parallel development across both governance and in-  
 334 frastructure domains: alignment across inventories and registries, robust allocation rules for  
 335 complex pathways, accessible ledger infrastructure, parallel analysis of indirect effects, and a  
 336 shift towards ledger-based permanence liability. Detailed implementation priorities are pro-  
 337 vided in Supplementary Box 1. As Article 6 of the Paris Agreement matures and mechanisms

<sup>338</sup> such as the EU's Carbon Removals and Carbon Farming Regulation<sup>81</sup> stimulate demand,  
<sup>339</sup> ensuring accurate, interoperable, and durable crediting will be essential.

<sup>340</sup> OAB provides a unifying scaffold for this convergence. Grounded in physical flux and  
<sup>341</sup> compatible with diverse technologies, OAB enables institutions to consistently interpret  
<sup>342</sup> project-level data while preserving the distinction between emissions reductions and true  
<sup>343</sup> removals. By closing the attribution gap that arises when accounting systems diverge from  
<sup>344</sup> the atmospheric carbon balance, OAB strengthens credit integrity, supports efficient cap-  
<sup>345</sup> ital allocation, and improves comparability across pathways. While it cannot resolve all  
<sup>346</sup> institutional or technical (e.g., permanence assessment) challenges, OAB reproducibly aligns  
<sup>347</sup> carbon accounting with the climate system.

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608 **Author contributions**

609 A.J.R. and K.M. conceptualized the study. A.J.R drafted the initial version and developed  
610 the figures and data analysis. K.M. contributed significantly to manuscript drafting, figure  
611 development, literature review, and editing. M.N.R. guided accounting formulation. M.N.R.,  
612 G.M.M., and M.R. contributed to conceptual development, manuscript editing, and final  
613 figures. All authors reviewed, edited, and approved the final manuscript.

614 **Competing interests**

615 The authors declare no competing interests.

616 **Supplementary information**

617 Supplementary Information is available for this paper.

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