



Ursula von der Leyen
President of the European Commission

Frans Timmermans
Executive Vice-President of the European Commission

Kadri Simson
Commissioner for Energy

Re: Call for European Commission Communication to recognise the need for a carbon capture and storage strategy to reach climate neutrality in Europe

Dear President von der Leyen,

Dear Executive Vice-President,

Dear Commissioner,

As the Fit for 55 package nears completion, the carbon capture and storage (CCS) discussion has reignited in the EU as it has become clear that it will be needed to cut emissions fast. As CCS moves from planning to deployment, in part with the aid of the EU Innovation Fund, the need for a policy framework, based on a robust set of guiding principles and safeguards, is needed to facilitate the deployment of critical infrastructure for industrial decarbonisation at scale by 2030. Deployment of CCS in Europe should prioritise high-value applications, and hard-to-electrify industrial processes with unavoidable process emissions, while also implementing appropriate guardrails. These are necessary to achieve greater public acceptance.

We welcome the European Commission's announcement to publish its Communication on the Strategic Vision on CCUS in early 2023. However, the European Commission's recently published Work Programme for 2023 excludes plans to publish said Communication. We strongly urge the Commission to grant such a Communication priority, in line with the need and urgency expressed by CCS stakeholders at the CCUS Forum and the commitment made by European Commission officials present.

The need for a comprehensive EU Strategy for Carbon Capture and Storage

The European Commission is uniquely placed to facilitate high-level strategic leadership in the deployment of CCS in Europe. As various EU Member States such as Denmark and Germany have prepared or are preparing their own national strategies to accelerate CCS deployment, it is imperative that regional and international factors are accounted for in order to ensure consistency is maintained on CCS deployment in the EU. In particular, an EU CCS strategy should:

- Focus explicitly on delivering climate neutrality. CCS cannot be used as a distraction from the need to reduce emissions to the maximum extent possible, including upstream emissions. Exposure to the full price of the EU ETS should remain the primary tool to encourage industrial emitters to decarbonise in line with the "polluter pays" principle.
- To ensure a climate benefit is maintained, prioritise the permanent storage of CO₂ in geologic reservoirs or products where CO₂ is permanently chemically bound.
- Establish clear definitions for CCS, Carbon Capture and Utilisation (CCU) and Carbon Dioxide Removals (CDR) to avoid conflation of the concepts and their associated trade-offs.
- Ensure only sustainable uses of biomass for CCS/CDR by taxing biomass according to its actual environmental impact until proper regulation of loss of carbon stocks and biodiversity in forests is in place.
- Introduce rigorous standards, monitoring and certification mechanisms for permanence of storage, as well as clear liability provisions for stored CO₂ that is released into the atmosphere. Bring into alignment funding provisions for CCS technologies with the magnitude of scale-up required to meet specific milestone targets outlined in the said Communication.
- Set appropriate deployment conditions which can act to accelerate scale up of CCS in the near term without disincentivising emissions reductions by other means, such as direct electrification or efficiency improvements. This could include a commitment to provide sufficient, accessible and fairly distributed capacity to permanently store CO₂ across Europe, especially for those sectors where there are no immediate decarbonisation alternatives.
- Establish specific and verifiable emissions reduction targets in line with 2050-relevant emission reduction pathways to provide clarity on the overall direction for CCS stakeholders.
- Outline the development of CO₂ capture and storage hubs, working towards a publicly regulated and open-access European CO₂ infrastructure network, enabling all modes of transport, to ensure the capture, transport and permanent storage of CO₂.

Thank you in advance for your time and consideration.