

CCSA WG meeting minutes

15 December 2025

Online Meeting – recording [here](#).

| No. | Item | Action |
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| | <p>Attendees</p> <p>Alberto Sanchez Miravalles, CCSA Stefano Miriello, CCSA Thierry Grauwels, CCSA Marino Varricchio, CCSA Ines Bonnet Sequeira, CCSA Ariadna Lungulescu, CCSA Jasper Heikens, Ecolog Frederic Vidal, Total Samuel Chan, ERM Caterina Molinari, Snam Nathanael De Leusse, NaTran Leslie Jaimes Gutierrez, Enagas Lukas Reichenberger, OGE Shafi Kareem, Elimini Giulia Staffetti, Snam Holly Henderson, Worley Theodor Pina, Snam Andrea Cipollett, Snam Maddalena Angiari, Snam Johanna Fiksdahl, Equinor Francesco Arena, ENI Kareem Shafi, Elimini</p> | <p>Giulio Nicoletti, Snam Freek Beijer, Gasunie Federico Cecchetti, ENI Smith Chris, Perenco Andrew Sanders, Perenco Ekaterina Shilina, RWE Mark Merks, RWE Jakob Lutz, RWE Samuel Chan, ERM Daniel Millward, Uniper John McLaughlin, Storegga Andrea Girotti, Snam Ben Skailes, Storegga Fergus Marcroft, Carboncatalyst Ben Skailes, storegga.earth Ong, Yea-Ling, Shell Jonathan Marshall, NavigatorTerminals Nicolai Mykleby-Skaara, Capturi Alessandro Bove, DNV Hina Qureshi, MOL Lucia Mora Ruiloba, Exolum Hermenegildo Altozano, Pinsentmasons</p> |
| 1 | <p>Agenda:</p> <ul style="list-style-type: none"> • Introduction & housekeeping • CO2 consultation planning & overview • Discussion on Consultation questions • Roundtable on the EU Parliament • AOB & conclusion | |
| 2 | <p>Key Discussion questions</p> <p>Regulatory Framework for CO2 Infrastructure</p> | |

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| | <ul style="list-style-type: none"> - Avoid additional regulatory intervention for nascent CO2 market. - Focus on business case and funding rather than regulatory gaps. - Caution against over-regulation, drawing lessons from hydrogen. <p>Future Regulatory Needs</p> <ul style="list-style-type: none"> - Anticipate future regulatory frameworks for a mature market. - Regulation can de-risk projects through financial and non-financial mechanisms. - Infrastructure requires ongoing regulation due to policy-driven nature. <p>Economic vs. Legal Regulation</p> <ul style="list-style-type: none"> - Distinguish between a legal basis and economic regulation. - Economic regulation includes market rules, tariffs, and access models - Concern that EU economic regulation could lead to a fully regulated regime. <p>EU Level Funding and De-risking</p> <ul style="list-style-type: none"> - EU level can help direct funds to specific projects. - Revision of block exemption regulation for direct refinancing. - Legislative tweaks to facilitate cross-border dispute settlements. <p>CO2 Pipeline Network Planning</p> <ul style="list-style-type: none"> - Bottom-up approach for network planning, reflecting project developments. - Avoid EU-wide coordinated planning that could slow down projects. - Prioritize regional or cluster-based initiatives over supranational planning. <p>Trade-offs in Network Integration</p> <ul style="list-style-type: none"> - Integration should enable and enhance, not delay, early projects. - Overestimating the success of planned networks is a risk. - Initial projects should prioritize speed and experimentation. <p>CO2 Pipeline Repurposing Barriers</p> <ul style="list-style-type: none"> - Clarify validity of existing permits for repurposed pipelines. - Technical feasibility challenges, especially for offshore pipelines. - Onshore repurposing is more feasible than offshore. <p>Cross-Border CO2 Transport Rules- Case-by-case arrangements for cross-border transport.</p> <ul style="list-style-type: none"> - Avoid delays from waiting for harmonized EU-level framework. - Future harmonization possible as market matures. <p>CO2 Storage Market Competitiveness</p> <ul style="list-style-type: none"> - Current market lacks sufficient projects for market dominance or failure. - Existing CCS directive and competition law provide sufficient rules. - Focus on funding rather than additional rules for market competitiveness. | |
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| | <p>Addressing CO2 Storage Risk</p> <ul style="list-style-type: none"> - Each project should negotiate its own risk outcomes. - Avoid a single overarching insurance structure. - Insurance for nascent market is costly or unavailable. <p>Strategic CO2 Pipeline Measures</p> <ul style="list-style-type: none"> - CO2 pipelines should be considered strategic assets. - Neutral stance on cross-subsidization from other networks. - Accelerated depreciation for quick cost recovery. <p>A roundtable discussion on the consultation will be held on 27 January at the European Parliament, hosted by MEP Jeannette Baljeu, with representatives of the European Commission. The agenda and speakers are being finalised, taking into account MEP Baljeu’s comments, and members will receive registration details, noting that seating will be limited and participation prioritised based on contributions to this workstream. The event coincides with the winter reception and a regulation and policy forum in Brussels on the same day, and members are encouraged to plan travel before the Christmas break.</p> | |
| 3 | <p>AOB & conclusion</p> <p>Final draft version will be shared by the end of the week.</p> | |