

CCSA Working Group Summary Minutes

Working Group	GGR & Carbon Markets
Date	15/09/2025
CCSA Lead	Despoina Tsimprikidou
Convenor	Greg Williams (Evero Energy)
# Attendees	31
Recording	https://vimeo.com/1118771057/56e17d6dfd?share=copy
Summary Minutes	<p>1. Introductions & CCSA Competition Law Policy Notice (Greg Williams – Evero)</p> <ul style="list-style-type: none"> • Introductions for new attendees <ul style="list-style-type: none"> ◦ Stuart Pace, Exxon Mobil • Housekeeping and competition law policy notice <p>2. CCSA Updates (Despoina Tsimprikidou, Rebecca Bell & Beth Hebditch - CCSA)</p> <p>Updates provided on:</p> <ul style="list-style-type: none"> • <u>CCSA Delivery Plan Update</u>. Action: please share relevant and high-level project information (e.g. capture volumes, emissions, type of GGR technology, project stage) with Rebecca.bell@ccsassociation.org for inclusion in the CCSA Delivery Plan. Data will be anonymised and member feedback will be sought before the Delivery Plan is published. • <u>CCSA Autumn Budget Submission</u>. The CCSA will be circulating a draft submission next week with members for their feedback. Feedback on the draft submission and supplementary case studies will be appreciated. <ul style="list-style-type: none"> ◦ Relevant to GGRs, the CCSA will also be exploring the proposal for a global buyers’ club for CDR whereby high-income, high climate ambition countries collaborate to create demand for high-quality durable CDR credits through commitments and risk sharing arrangements. ◦ Additional topics covered in this submission will be the ticket size for National Wealth Fund and the future of NZIP grant funding. • <u>CCSA GGR Position Paper</u>. Action: Members to submit feedback despoina.tsimprikidou@ccsassociation.org on draft recommendations of the GGR Position Paper (please see meeting slides). <ul style="list-style-type: none"> ◦ Addressing barriers for next wave of projects and promoting a clear use case for negative emissions credits. ◦ Additional demand levers: <ul style="list-style-type: none"> ▪ Global buyers’ club ▪ Public procurement

- SAF Mandate: Alignment with work and recommendations of the Jet Zero Taskforce.
- Transition planning
- CCUS Market Transition: calls for evidence and upcoming consultations
 - The CCSA is currently responding to:
 - Future Networks Strategy Call for Evidence
 - Evolution of Economic Regulation for CO2 Storage Call for Evidence

Refer to the slides and recording for full details of updates.

3. UK GGR Market Updates (Despoina Tsimprikidou – CCSA, Greg Williams – Evero, All)

Updates provided on:

- Track 1 Expansion Project Negotiation List
- BSI Flex Standards Publication
- GGR Business Model Publication
- Decision on integration of GGRs in the UK ETS

BSI Flex Standards Publication

- Concerns raised for the DACCS Flex around PPA and hourly matching requirements. This is similar across both the BSI Flex and the CRCF.
- Similar language is being used on energy penalty provisions across both the BECCS and DACCS MQT as well as the wider market leakage provisions which do not allow PPA arrangements for site-owned renewable power generation.
- Conservative interpretation of cap and trade in terms of market leakage.
- Some concerns around a potentially moving baseline calculation as this has changed to BAT instead of historical emissions.
- Overall positive progress for the standard but provisions around power import are conservative and complex.
- BSI standard more flexible than the CRCF at this stage and allows for adaptation on a project specific basis.

GGR Business Model

- PDI change from 10% to 5% might not be a concern as it is now stipulated that the 5% is no longer in relation to reference price but to the entire achieved sales price of the credit.
- Concerns raised around pushing for a better PDI value.
- To provide more time to digest the contents of the draft GGR contract.

	<p><u>Integration of GGRs in the UK ETS</u></p> <ul style="list-style-type: none"> • Concerns raised on potential inclusion of woodland credits in the UK ETS as this would not follow the like-for-like principle and would undermine the integrity of the ETS, in particular in the context of potential ETS linkage. <ul style="list-style-type: none"> ◦ Suggestion for CCSA to engage on the woodland inclusion piece with the UK ETS Authority and DESNZ. • Noted lack of reference to a GGR ETS sub-mandate in the Authority’s response. • ETS linkage came up strongly during this discussion and perceived risk of UK being rule taker in the negotiations. • UK needs to remain strong in its own GGR policy as farther ahead than the EU. • There’s a lot to still clarify on how the relationship will work (including GGRs mutual credit recognition). <p><i>Refer to the slides and recording for full presentation details.</i></p> <p>4. EU CDR Updates (Ariadna Lungulescu – CCSA)</p> <ul style="list-style-type: none"> • Set out CCSA engagement on UK/EU ETS linkage via published letter as well as currently open CRCF consultation on certifying carbon removals. • Potential joint CDR/GGR and cross-border working group meeting on ETS linkage. • Suggestion for a comparison summary of CRCF vs BSI standards vs private market standards for reference during discussion on ETS linkage priorities. • Different GGR integration timelines vs ETS linkage priorities. • CCUS and GGRs need to be expressly included as a priority area for negotiations. <p><i>Refer to the slides and recording for full presentation details</i></p>
<p>Actions</p>	<ol style="list-style-type: none"> 1. CCSA Delivery Plan Update: Members to provide GGR project information to rebecca.bell@ccsassociation.org 2. CCSA Secretariat to share the draft CCSA response to the CRCF consultation for member input (please see below). 3. CCSA to provide an update in due course on a joint GGR and Cross-border Working Group meeting on EU/UK ETS linkage, including a comparison summary of areas of alignment between BSI and CRCF standards. 4. CCSA to consider further advocacy action on inclusion of woodland credits in the UK ETS. 5. Members to consider submitting individual responses to BSI BECCS and DACCS Flex Consultations. 6. Members to submit feedback and reactions to despoina.tsimprikidou@ccsassociation.org on:

	<ul style="list-style-type: none">○ Draft Recommendations of CCSA GGR Position Paper (please see meeting slides)○ GGR Business Model○ Decision on GGR integration in the UK ETS
Next Meeting Date	15 th December 2025
All working group materials can be found here	