



8 March 2021, Brussels

To:
Commissioner for Energy, Kadri Simson
Members of the European Parliament Committee on Industry, Research and Energy
Members of the Energy Working Group of the Council of the EU

Dear Commissioner, Members of ITRE Committee and Energy Attachés,

We would like to share our feedback on the revised version of the Trans-European Networks for Energy (TEN-E) Regulation with reference to the exclusion of CO₂ storage and CO₂ transport modalities other than pipelines from its scope. Despite ongoing efforts by a number of stakeholder groups including NGOs and industry, the current proposal from the European Commission does not include these two key elements. As the representatives of an emerging carbon dioxide removal industry we join these calls and urge you to introduce relevant amendments during the upcoming negotiations of the dossier. The TEN-E proposal in its current form is not fit to support the achievement of the climate neutrality objective.

- The CO₂ networks with the purpose of permanent storage are a prerequisite for enabling technological carbon removals and a vital part of the pathway to climate-neutrality. Recognition of the CO₂ storage in the TEN-E would be an important step in making the role of carbon removals clear to the general public and in boosting investor confidence. The IPCC's 1.5 degree mitigation pathways project carbon removals in the order of 100–1000 Gt of CO₂ over the 21st century. The Commission's scenarios recognise that emission reductions will not suffice to achieve -net-zero target - around 0,5 Gt/CO₂ a year will need to be removed by 2050 by a combination of enhancement of LULUCF sinks, **technological removals with geological storage of CO₂ such as BECCS and DACCS**, and other methods.¹
- The revised version of the TEN-E Regulation contradicts the underlying justification for the revision as highlighted in the European Green Deal: "*The regulatory framework for energy infrastructure, including the TEN-E Regulation, will need to be reviewed to ensure consistency with the climate neutrality objective. This framework should foster the **deployment of innovative technologies and infrastructure**, such as smart grids, hydrogen networks or **carbon capture, storage** and utilization, energy storage, also enabling sector integration.*"²

¹ In-depth analysis in support of the Commission Communication 'A Clean Planet for all'
<https://ec.europa.eu/clima/sites/default/files/docs/pages/com_2018_733_analysis_in_support_en_0.pdf>

² Revision of the guidelines for TEN-E
<<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12382-Revision-of-the-guidelines-for-trans-European-Energy-infrastructure>>



- By excluding it from the eligibility as Projects of Common Interest (PCI), the proposal does not take into account the climate mitigating impact of CO2 storage. We oppose the notion that the sustainability of any CO2 network PCI will be limited to its ability to transport CO2 - **the climate benefits of CO2 networks materialise through a combination of CO2 transport and storage, in conjunction with CO2 removal facilities.** Crucially, the justification in the Impact Assessment quoting the funding available to CO2 storage under the Innovation Fund is invalid - other types of infrastructure (hydrogen networks, energy storage) included in the TEN-E are also eligible for funding through the Innovation Fund.
- Finally, **inclusion of transport of CO2 by other means than pipelines** - such as trucks, ships or barges - **would increase flexibility, resilience and security** of CO2 transport. Transport by ships can easily be connected to port storage facilities, which are already covered by TEN-E, serving as a natural extension of a CO2 transport network. Transport of CO2 by trucks, such as planned in Oslo's waste-to-energy with CO2 storage project, enables demonstration and deployment of carbon removal at scale where the conditions are not suitable for the use of pipelines.

We remain at your disposal for any further information.

Sincerely,

Anna Dubowik
Secretary General, Negative Emissions Platform