



Ms Kadri Simson, Commissioner for Energy  
European Commission  
Rue de la Loi / Wetstraat 200, 1049 Brussels, Belgium

21 December 2020

Dear Commissioner Simson,

In light of the recent revision of the Trans-European Networks for Energy (TEN-E) Regulation and on behalf of the Zero Emissions Platform (ZEP), I would like to share with you our thoughts.

ZEP is the technical adviser to the European Commission under the Horizon 2020 programme on the deployment of CCS and CCU technologies. ZEP is privileged to count on a broad member base and diverse leadership, ranging from energy and industry companies to equipment suppliers, environmental NGOs, academia, and trade unions. ZEP fully supports the European Union's goal on climate neutrality, acknowledging that the European Climate Law and the European Taxonomy for Sustainable Finance are real game changers.

For many upcoming and soon-to-be operational CCS projects in Europe, it is essential that a supportive policy framework is put in place. The failure to recognise all modalities of CO<sub>2</sub> transport in the revision other than pipeline – such as ships, trucks, train, barges, as well as the exclusion of CO<sub>2</sub> storage, an essential component of CCS projects and the real enabler for mitigation – leaves many open questions and risks for any stakeholders looking at investing in CCS. If this outcome is confirmed, upcoming projects which rely on CO<sub>2</sub> transport by ship will be jeopardised. At a time where many industries and energy stakeholders – also represented in ZEP – look for ways to decarbonise their activity in a cost-efficient way, the European Union should strive to keep a technology-neutral approach.

The revised regulation also references low-carbon and renewable gases. ZEP stresses the importance of providing clear definitions of such gases based on thorough and transparent carbon accounting and robust lifecycle analysis.

The development of shared CO<sub>2</sub> transport and storage infrastructure is the ultimate European project – a no-regret investment opportunity to pave the way for a climate-neutral European economy, safeguarding jobs, industrial competitiveness and welfare. Timely development of this infrastructure is also critical to kick-start a clean hydrogen economy for the EU, where early, large-scale volumes of low-carbon hydrogen are produced and delivered.

The recovery plan also presents a unique opportunity for the EU to drive forward a clean agenda and create sustainable growth. Market-ready CCS projects are an important tool to support both the EU's climate objectives and to maintain prosperity and



competitiveness for the European energy-intensive industries that are at the core of the European economy.

Finally, we remain at your disposal for any further clarifications and we look forward to the possibility of arranging a meeting at a time of your convenience.

Kind regards,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Dr Graeme Sweeney

Chairman of the Zero Emissions Platform