

## ZEP feedback 'EU emissions trading system (ETS) – update of the rules for monitoring and reporting emissions'

ZEP welcomes the opportunity to provide feedback on the draft implementing regulation on the monitoring and reporting of greenhouse gas emissions.

The revised EU ETS directive states that “as CO<sub>2</sub> is also expected to be transported by means other than pipelines, such as by ship and by truck, the current coverage in Annex I to Directive 2003/87/EC for transport of greenhouse gases for the purpose of storage should be extended to all means of transport for reasons of equal treatment and irrespective of whether the means of transport are covered by the EU ETS”. Annex I of the directive is amended accordingly to cover the “Transport of greenhouse gases for geological storage in a storage site permitted under Directive 2009/31/EC, with the exclusion of those emissions covered by another activity under this Directive”.

This extended coverage to all means of transport needs to be reflected under the regulation on the monitoring and reporting of greenhouse gas emissions to ensure consistency across EU legislation. As mentioned in a previous response sent by ZEP<sup>1</sup> changes are required, including:

- an amended definition 55 under Article 3 of implementing regulation 2018/2066 – the following change is proposed: “‘CO<sub>2</sub> transport’ means all transport modes (pipeline, ship, barge, truck, train...) for geological storage in a storage site permitted under Directive 2009/31/EC;”
- an amended definition 63 under Article 3 of implementing regulation 2018/2066 – the following change is proposed: “‘transport network’ means all modes required for the transport of CO<sub>2</sub> for geological storage in a storage site permitted under Directive 2009/31/EC”
- an amended chapter 22 of Annex IV of implementing regulation 2018/2066 – This chapter must be amended to reflect the possibility to use all transport modes to store CO<sub>2</sub> permanently and subtract CO<sub>2</sub> from the emissions of the installation.

Finally, the draft implementing regulation should clarify whether CO<sub>2</sub> emitted by the transport mode and CO<sub>2</sub> transported as part of the cargo will be monitored and reported in a synchronised manner.

### About the Zero Emissions Platform

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*ZEP is the advisor to the EU on the deployment of CCS and CCU – a European Technology and Innovation Platform (ETIP) under the European Commission’s Strategic Energy Technologies Plan (SET-Plan).*

*ZEP supports the European Union’s commitment to reach climate neutrality by 2050, defined as net-zero greenhouse gas (GHG) emissions by 2050. To this end, CCS technologies represent readily available and cost-efficient pathways for the decarbonisation of industrial and energy sectors in the European Union. Some applications of CCU – where CO<sub>2</sub> is stored in a manner intended to be permanent – can also contribute to this goal.*

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<sup>1</sup> [ZEP response to the consultation on EU Emissions Trading System](#), 2020.