



Council of the European Union  
General Secretariat

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**Interinstitutional files:  
2021/0211 (COD)**

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**Brussels, 14 June 2022**

**WK 8613/2022 INIT**

**LIMITE**

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## **CONTRIBUTION**

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From: General Secretariat of the Council

To: Coreper I

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Subject: Fit for 55 package - ETS: Comments from a delegation

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In view of Coreper I meeting on 15 June 2022, delegations will find attached a proposal by the EL delegation on CO2 sequestration.

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WK 8613/2022 INIT

**LIMITE**

**EN**

## **GREECE**

### **COREPER 15.06.2022: FIT FOR 55 – ETS**

#### **Proposal**

Meeting European Green Deal level of ambition to make EU climate neutral by 2050 in combination with the achievement of the net greenhouse gas emissions reduction target of at least -55% by 2030 and the net carbon removals of -310 Mt of CO<sub>2</sub> by 2030 will require, among others, many giga tons of CO<sub>2</sub> sequestration in order to achieve our EU goals as well as to meet our international commitments like the Paris Agreement's goals. However, the current EU framework does not allow CO<sub>2</sub> sequestration outside the EU, which seriously limits the possibilities and incentives for CCS. Furthermore, the ETS Directive as it stands limits CO<sub>2</sub> sequestration to the CO<sub>2</sub> transported by pipelines to storage sites within the EEA area.

The new ETS proposal Coreper is discussing will allow the transport of CO<sub>2</sub> to storage sites by all means, including maritime transport. However, it retains the limitation to sites within the EU/EEA. If, however, in combination with the extension to maritime transport, we extended the possibility to sequester CO<sub>2</sub> in sites with comparable standards in third countries, for example the US, then our possibilities to sequester carbon would be multiplied dramatically, utilizing market forces. We would then be able to meet our carbon removal goals many times over.

More specifically, in accordance with Article 12(3a) of the existing ETS Directive, the exception to surrender allowances in case of CCS is only applied when the emissions are stored in a facility with a permit in force in accordance with the CCS Directive. This is reflected in the CCS activities in the Annex I of the ETS directive, which, refer to the capture or storage “in a storage site permitted under directive 2009/31/EC”. According to the new ETS proposal, the current coverage in Annex I to Directive 2003/87/EC for transport of greenhouse gases for the purpose of storage is extended to all means of transport for reasons of equal treatment, therefore due to extended scope of the proposal (eg inclusion of shipping), it will be possible for the CO<sub>2</sub> to be transferred safely to non-EEA third countries. Therefore, we need a further amendment that will allow transport of CO<sub>2</sub> outside the EU/EEA.

To this end, Greece proposes the following amendments to the ETS proposal:

- At the end of Article 12(3), the following words are added: “, or another facility in non-EEA third Countries in respect of which the Commission adopts a decision confirming that equivalent safeguards to those of Directive 2009/31/EC are in place, provided that that the storage is not used for enhance oil recovery and to the extent that this leads to overall reduction of emissions. »
  - In Annex I, the words “or in respect of which the Commission has adopted a decision pursuant to Article 12(3a)” is added to each of the activities “Capture of greenhouse gases from installations covered by this Directive for the purpose of transport and geological storage in a storage site permitted under Directive 2009/31/EC”, “Transport of greenhouse gases for geological storage in a storage site permitted under Directive 2009/31/EC” and “Geological storage of greenhouse gases in a storage site permitted under Directive 2009/31/EC”.
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