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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Transport, Telecommunications and Energy Council on 29 October 2026 CO2 transportation infrastructure and markets - Information from Belgium

CO₂ transportation infrastructure and markets

The competitiveness of European industry is increasingly under pressure. For a number of energy intensive and hard- to- -abate sectors that are essential to European value chains, carbon capture and storage (CCS) remains indispensable to enable deep decarbonisation while anchoring these industries in Europe. On top of the general difficulty to reach Final Investment Decisions in the EU, inter alia due to high international energy prices, CCS deployment remains constrained by the lack of a competitive, functioning market model. This is due to multiple factors, including an insufficiently robust carbon price, high costs of first-of-a-kind CO₂-capture, transport and storage infrastructure and a disproportionate concentration of value chain risks on industrial emitters, leaving many technically mature projects unable to take Final Investment Decisions. Similarly, capture projects depend on the simultaneous availability of transport and storage infrastructure, while transport and storage operators depend on sufficient capture volumes that will often need to be aggregated from multiple Member States. **In this context, the forthcoming EU framework on CO₂ transport is essential to help create a viable European market and enable development and the de-risking of crossborder- infrastructure, and facilitate the efficient integration of national CO₂ transport networks.**

The European CO₂ transport market remains currently at an early and immature stage. Investment decisions are characterised by high upfront costs, long lead times and significant regulatory and commercial risks across the value chain. In this phase, regulatory certainty at national level is crucial. Member States that have established dedicated CO₂ transport frameworks have done so to provide legal clarity, allocate responsibilities and reduce risks for first movers. **We encourage the Commission to preserve national regimes so that frontrunner frameworks are not subject to premature or disruptive changes.** An EU initiative needs to respect different national starting points and ensure sufficient flexibility, allowing Member States to maintain or develop regulatory models that reflect their specific industrial, geographic and infrastructural circumstances.

At the same time, we see clear added value in a timely European initiative on CO₂ transport infrastructure and markets, particularly to address the cross-border dimension of the value chain. We therefore look forward to the Commission's forthcoming proposal as an important opportunity to complement national frameworks and facilitate the emergence of an integrated European CO₂ transport market. In this context, **we encourage the Commission to integrate targeted and proportionate EU level- rules on cross-border transport** — such as transparency requirements or proportionate common minimum requirements for non-discriminatory access, transparent tariffs and technical interoperability — that can play a key role in providing visibility on network development, capacity availability and access conditions, while preserving flexibility with national market models. Such transparency would significantly support industrial investment decisions and reduce coordination risks across borders.

Also the cost-effectiveness of the market needs to be ensured to keep EU industries competitive. In that perspective it is important that all relevant storage potentials are taken into consideration, while the integrity of the EU ETS and relevant environmental and safety regulation should always be guaranteed. The European framework should facilitate access to storage capacity across Europe, including through cross-border transport arrangements, thereby diversifying storage options, improving system resilience and enabling cost-effective solutions for European industry. Clear arrangements on liability, monitoring, responsibilities and the transfer of CO₂ between operators and jurisdictions are also important to provide legal certainty throughout the cross-border value chain.

In parallel, **we urge the Commission to help to reduce the risks associated with CCUS projects across the entire value chain** in order to create a level playing field between Member States. Appropriate financial support and dedicated derisking instruments are crucial European instruments to enable development of CCS value chains.
