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CLIMA -CCS -DIRECTIVE@ec.europa.eu

## **Net-Zero Industry Act - Transparency of CO<sub>2</sub> storage capacity data Report by Finland according to Articles 21(2) and (3)**

### **Art 21 (2)**

**(a) a mapping of CO<sub>2</sub> capture projects in progress on its territory or in cooperation with other Member States, and an estimation of the corresponding needs for injection and storage capacities, and CO<sub>2</sub> transport;**

**(b) a mapping of CO<sub>2</sub> storage and CO<sub>2</sub> transport projects in progress on its territory, including the status of permitting under Directive 2009/31/EC, expected dates for Final Investment Decision (FID) and entry into operation;**

#### *CO<sub>2</sub> capture projects in progress*

There are several CO<sub>2</sub> capture projects in various stages of development and of various sizes. Most of the projects aim at utilization of CO<sub>2</sub> and only some of them to permanent geological storage of CO<sub>2</sub>.

#### *CO<sub>2</sub> storage and transport projects in progress*

According to national CCS- law (416/2012) transposing CCS directive (2009/31/EC) geological storage of CO<sub>2</sub> is prohibited in Finland. Because of the geological and legal reasons described above there are no CO<sub>2</sub> storage sites that could be permitted in Finland.

At the moment projects that would transport captured CO<sub>2</sub> for permanent geological storage outside Finland are in early stages of development. Finland provides estimates of injection and storage capacities and CO<sub>2</sub> transport needs at subsequent reports as appropriate.

The Bioenergy Association of Finland has launched in December 2024 a Bio-CCUS and biochar map on completed and planned bio-CCUS and biochar investments, as well as carbon dioxide treatment projects and terminals, which is available at <https://www.bioenergia.fi/en/bio-ccus-biochar/>



**(c) the national support measures that have been or will be adopted to prompt projects referred to in points (a) and (b) of this paragraph, as well as measures relating to the cross-border transport of CO<sub>2</sub>**

**(d) the national strategy and targets that will be and have been set for the capture of CO<sub>2</sub> by 2030, where applicable;**

There are no ear-marked support mechanism for CCUS, but generally for clean energy technologies there are. There is also no dedicated strategy or target setting for capturing CO<sub>2</sub> by 2030.

There is ongoing work to prepare national energy and climate strategy. The strategy will be published and submitted to parliament during 2025. The strategy will also include provisions for CCUS.

**(e) bilateral and regional cooperation that facilitates the cross-border transport of CO<sub>2</sub>, including their implications for the access of entities capturing CO<sub>2</sub> to a safe and non- discriminatory means of transporting CO<sub>2</sub>**

There are ongoing bilateral negotiations on non-binding agreements (Memorandum of Understanding) regarding cross-border transportation of CO<sub>2</sub> with the purpose of permanent geological storage.

Finland participates also various groups and networks e.g. under the Nordic Council of Ministers that provide opportunities to discuss CCUS- related issues at regional level.

**(f) CO<sub>2</sub> transport projects in progress and an estimation of the necessary future CO<sub>2</sub> transport projects' capacity to match the corresponding capture and storage capacity.**

See answer to 21 (2) (a) and (b).

### **Art 21(3)**

**Should the report referred to in paragraph 2 show that no CO<sub>2</sub> storage projects are in progress on their territory, Member States shall report on plans to facilitate the decarbonisation of industrial sectors. This shall, if applicable, include the cross-border transport of CO<sub>2</sub> to storage sites located in other Member States as well as CO<sub>2</sub> utilisation projects**

See answers to 21 (2).



As an input to national energy and climate strategy also sectoral low- carbon road maps have been updated <https://tem.fi/en/low-carbon-roadmaps-2035>



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## Net-Zero Industry Act - Transparency of CO2 storage capacity data Art 21(1)

Reference: Ares(2024)4778750 – 03/07/2024

### **According to Art. 21(1) Member States shall**

#### **(a) Make publicly available data on all areas where CO2 storage sites could be permitted on their territory;**

According to the national law (416/2012) transposing CCS directive (2009/31/EC) geological storage of CO2 is prohibited in Finland. Prohibition does not apply to the geological storage of carbon dioxide if the quantity to be stored is less than 100,000 tonnes and the purpose of the storage is to research, develop and experiment with new products and methods.

According to current knowledge there are not any suitable geological formations for permanent storage CO2 in Finland. This is based on the statement by Geological Survey of Finland (K/468/42/2010) given during the process to prepare the national law (416/2012) and consulting experts in Geological Survey of Finland in 2024.

Because of the geological and legal reasons described above there are no CO2 storage sites that could be permitted in Finland and therefore no data to be made publicly available.

#### **(b) oblige entities which are or have been holders of oil and gas production authorisations as defined in Article 1, point 3, of Directive 94/22/EC on their territory to make publicly available on a non-reliance basis geological data relating to production sites that have been decommissioned or whose decommissioning has been notified to the competent authority ( 2 ).**

We refer to our notification pursuant to 23 (1) and (3) that in Finland there are no entities that hold an authorisation within the meaning of Article 1, point 3, of Directive 94/22/EC.

In Finland there are no entities that should be obliged to make geological data according to 21(1) publicly available.