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Joint Voka-AKT initiative on CCS:

Three main policy asks

1. Urgency and first mover advantage

Belgium must act now to realize a CO₂ value chain by 2029; critical KPIs must be strictly monitored to secure volumes, financing, and industrial anchoring.



2026

- First CCFD tender launched (approved by DG Comp) must be launched end 2026
- Sufficient budget allocation for CCS

2027

- First CCFD awarded as from Oct. 2027 to enable FID on capture projects
- · Contractual arrangements (transport and storage agreement needed)

2029

- Backbone in place by Q2 • Backbone operational by Q3
- CO2 exit points/terminals
- ready for shipping CO2 in sea harbors

2030-2032

- CO2 onshore pipeline, offshore pipeline and storage
- Connection with Germany to be established

2. Regional alignment

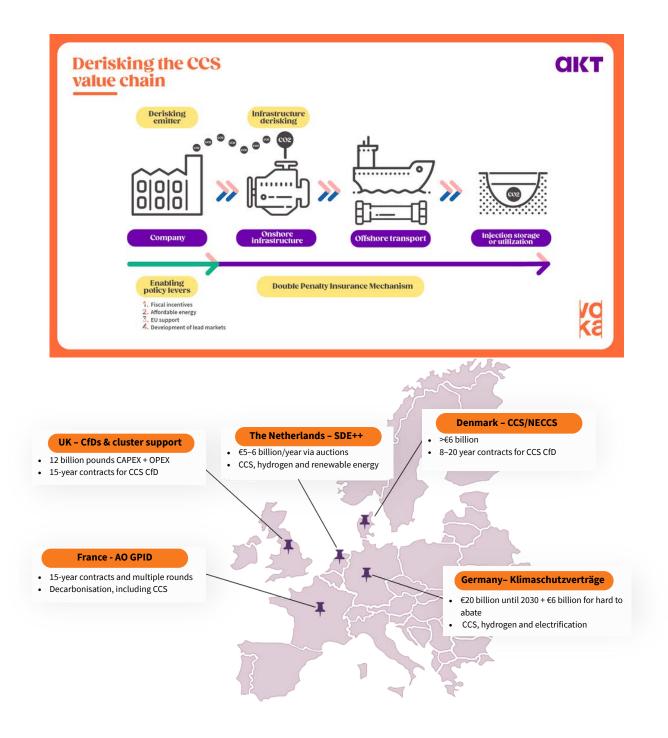
Interfederal platform "Make2030": pragmatic collaboration to align regional actions

- Regional cooperation: pooling Flemish and Walloon CO₂ volumes to secure economies of scale.
- Joint budget planning: clear public financing trajectories to provide visibility for industry.
- Regulatory framework: harmonized technical standards, streamlined permitting, and recognition of CO₂ infrastructure as "public interest".
- Cross-border cooperation: early agreements with North Rhine-Westphalia, Zeeland, Hauts-de-France to aggregate volumes and reduce costs.



3. Derisking the value chain

Flanders and Wallonia must allocate the required budgets to de-risk CCS. Only by matching the multi-billion Euro efforts of our neighbouring countries can we secure industrial competitiveness, safeguard jobs, and anchor future industrial investments and build Belgium's role as a European CO2 hub.





Introduction

ACT NOW TO SECURE THE CCS INDUSTRIAL NEEDS

To achieve Europe's climate goals while safeguarding Belgium's industrial base, jobs and future competitiveness, Carbon Capture and Storage (CCS) must be treated as an immediate political and budgetary priority.

In both Flanders and Wallonia, CCS is indispensable to decarbonize hard-toabate sectors such as cement, steel, lime, and chemicals — sectors with no alternative scenarios — and for blue hydrogen. Beyond reducing emissions, CCS delivers broad economic benefits: it anchors industrial employment, drives investment in future-proof infrastructure, and positions Belgium to help shape the continent's CO₂ transport and storage systems. Over time, this infrastructure and value chain could also serve as a foundation for developing Carbon Capture and Usage (CCU) applications and enabling a circular CO₂ economy, further boosting industrial innovation and value creation.

The case for CCS is clear: leading industrial stakeholders are already preparing concrete projects, and independent Belgian studies (EnergyVille, Klimaatsprong, and others) confirm the need for large-scale CO₂ capture in both regions and warn that delays in investment lead to much higher system costs later.

The window of opportunity is narrow: by 2029 Belgium should establish a competitive backbone, linking the first projects and preparing connections with Germany and exporting pipelines. The German volume would allow Belgium to obtain the economies of scale on its infrastructure, delivering economies of scale and bringing down cost per ton of CO₂, which would create better economic conditions to activate the CCS at scale and benefit Belgian

industries. On the contrary, if action is delayed, Germany's CO_2 volumes may be lost to competing routes through the Netherlands. Moreover, delaying the development of the grid could jeopardize the European financing at risk.

Acting now means securing critical volumes, lowering costs, anchoring industry in Belgium, and ensuring a credible leadership role at the European level. It is therefore critical to have a clear, short-term, concrete budget engagement from the regions, including their coordinated support to start action.

WHAT IS NEEDED TO MAKE CCS HAPPEN

CCS is a transnational value chain that includes capture, transport, storage (or utilization at a later stage), and long-term monitoring and governance. Its successful deployment requires **system-wide coordination** between public and private stakeholders, and among Belgium's federal, regional, and interfederal institutions.

To seize this opportunity, urgent action is needed. Belgium must send a clear political and budgetary signal, supported by a whole-of-government approach. Governments must commit to **budgetary support** that derisks the first wave of investments — through conditional repayment loans and guarantee mechanisms for the buildout of the CO₂ network and through mechanisms such as Climate Contracts for Difference (CCfDs) for the emitters. These measures are not about permanent subsidies but about providing early certainty to unlock projects.

Timing is key! A number of projects require action in the next half year to take Final Investment Decisions by February 2026 in order to secure European funding. If conditions are



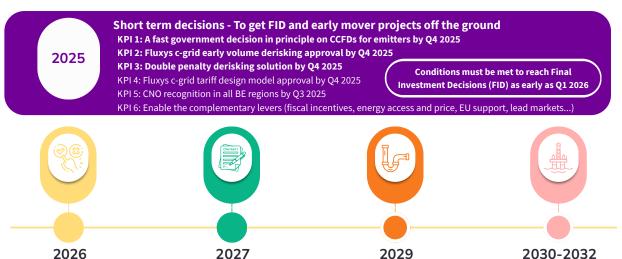
not met to take FIDs as early as Q1 2026, CCS will be delayed by several years in Belgium, missing anchoring of the industry in Belgium, and lose a credible leadership role at the European level. A second wave of early-mover projects are necessary to enable the development of large-scale national and international transport infrastructure and associated benefits from economies-of-scale. These projects require clear budget decisions rapidly and the development of coordinated tender mechanisms by 2027, delivering scalability and longterm viability.

Some key milestones are identified to make CCS happen before the end of the decade.

In this position paper we will discuss the two main priorities: on the one hand the need for robust derisking mechanisms to cover risks of the value chain components in time and of the ETS cost and on the other hand policy coordination across all governments.

The time to act is now — through the de-risking of CCS projects and the establishment of strong, coordinated policy governance to turn ambition into action. Early movers are unlocking the Belgian CCS future, but only if business cases remain acceptable.

KEY MILESTONES



- First CCFD tender launched (approved by DG Comp) must be launched end 2026
- Sufficient budget allocation for CCS
- First CCFD awarded as from Oct. 2027 to enable FID on capture projects
- Contractual arrangements (transport and storage agreement needed)
- Backbone in place by Q2
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2030-2032

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1. Derisking CCS projects

To kick-start CCS in Belgium, three targeted de-risking measures are essential: conditional loans and guarantee mechanisms for the CO2 network operator; derisking mechanisms such as well-designed CCfDs for emitters; and ETS relief for the value chain during temporary interruptions in a part of the CO2 transport & storage chain (to avoid "double penalty"). These are not permanent subsidies but time-bound risk-sharing mechanisms to unlock projects and drive scale.

At the same time, complementary policy levers — such as EU funding access, green public procurement to promote low-carbon products, lower energy prices, fiscal incentives, etc. — must be activated to reduce costs and ensure long-term competitiveness of carbon capture projects. Without such a coordinated approach, the CCS value chain will simply not get off the ground. The different steps are outlined in the following paragraphs.

1.1 De-risk investments in CO₂ infrastructure to kick-start the CO₂ market

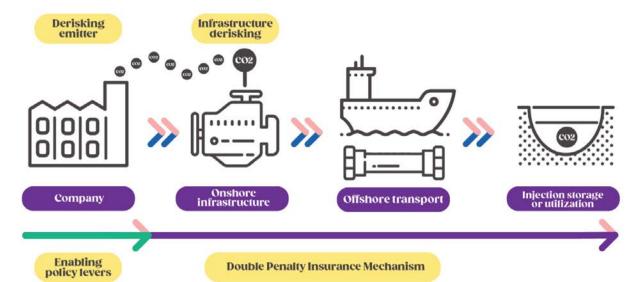
The development of a CO₂ transport network faces the classic "chickenand-egg" problem: emitters are hesitant to commit before infrastructure exists, while network operators are reluctant to build without guaranteed supply of CO2. Adding to this is the uncertainty of future market development, the CO2 network operators must be ready for initial CCUS projects but rely on future emitters joining the network to make the project bankable given the pipelines are built for mediumterm demand. However, without knowing when more connections will materialize, the network operator faces significant risk in investing early to support initial CCUS projects.

Derisking the CCS value chain

Fiscal incentives
 Affordable energy
 EU support

4. Development of lead markets

Multiple derisking mechanisms are essential and needed together while also working on enabling conditions to create a CCS business case.





To enable the timely and cost-effective deployment of the onshore CO₂ transport network, the development of de-risking mechanisms to address this 'under-utilization' risk of the CO₂ transport network is of key importance, certainly in the ramp-up phase. Without such measures, the financial burden and overall risk for the transport operator is too significant to justify initiating development of the CO₂ network. The public authorities must consider the CO₂ network as a "no regret" strategic energy infrastructure investment (like motorways, railways, waterways network) that will maintain, but also attract, industrials requiring CCS for sustained operations, over the long term.

Neighboring countries have already developed de-risking mechanisms to tackle this challenge.

- In the United Kingdom, the government supports CCUS through business models that provide guarantees and compensation to the network operator and underwriting of infrastructure development.
- The Netherlands' SDE++ subsidy scheme and state-backed infrastructure planning and financial support have enabled carbon transport and storage projects like Porthos and Aramis to move forward.
- Germany, in the context of hydrogen, has introduced state co-funding to stimulate early infrastructure investment.

Crucially, these de-risking measures are sustained efforts over time, with policy support needed until a selfsustaining market emerges and an overall state guarantee if the market does not materialize in the end.

These frameworks have led to Final Investment Decisions (FIDs) in the private sector.

- The Northern Endurance Partnership in the UK for example will transport and store 4 million tons of CO₂ as of 2028, rising up to 23 million tons by 2035.
- Porthos in the Netherlands, will transport and store 2.5 million tons of CO₂ annually as of 2026.
- And the first phase of the German so-called hydrogen core-grid (cf. EU targeted "backbone") is currently being rapidly developed. This demonstrates that well-designed de-risking measures do unlock real, large-scale infrastructure commitments.

The Flemish and Walloon governments should:

 Play a similar role in the development of the interregional onshore CO₂ network by reducing investor risk and enabling early infrastructure deployment, without transferring financial risk to earlymoving emitters and while offering attractive tariff conditions to initiate the CCS value chain with an acceptable business case. This can include conditional repayment loans and guarantee mechanisms on transported volumes over time as well as regulatory clarity facilitating offtake agreement. By stepping in as a risk-sharing partner, the government can help unlock private investment and create the market confidence needed to kickstart CO₂ network development.



• Closely cooperate to aggregate their CO2 volumes into the crossborder CO₂ transport network. Efficiently collecting regional volumes can create economies of scale leading to a faster ramp-up of the CO₂ backbone profitability. This would generate certainty for the value chain. By aligning their efforts, both regions can hence improve the bankability of the infrastructure and accelerate the rollout of CCUS in Belgium and actively attract CO₂ volumes from neighboring countries, particularly from industrial hubs in Germany and the Netherlands, to further increase throughput and reduce per-ton costs. Moreover, the Connecting Europe Facility for Energy can be used to finance cross-border carbon infrastructures.

1.2 Derisking emitters via CCfD

De-risking investments in CO₂ infrastructure must help reduce tariffs borne by emitters, but not nearly enough to make industrial CCS projects financially viable under the current EU ETS carbon price. Without additional targeted support to cover situations where the ETS price would be below the agreed higher cost of producing a decarbonized product (the "strike price"), these projects will not get off the ground due to the related financial conditions.

To make a business case possible, both the Flemish and Walloon governments must step up and complement European efforts. This requires substantial regional contributions through substantial direct financial support or an

insurance mechanism that could be covered by ETS and CBAM revenues.

Specifically:

- OPEX and CAPEX-based support mechanisms are needed, such as well-designed Carbon Contracts for Difference (CCfDs), to bridge the cost gap and de-risk first industrial CCS investments. Such mechanism also supports the de-risking of the transport and storage aspects of the CCS value chain by providing certainty on fees and volumes.
- Structural and recurring calls for new CCUS projects should be organized by the government.
- These CCfDs should be aligned between Flanders and Wallonia to create a level playing field for industry and avoid fragmentation.
- Funding should come among other from regional recycling of ETS and CBAM revenues: the proceeds generated through the EU ETS must flow back into industrial decarbonization including CCS.
- EU funding should be leveraged and successful projects supported with regional funding in order to be realized

This is not about permanent subsidies, but rather a temporary, strategic intervention aimed at unlocking the early-mover projects. To be effective, such a scheme should provide a stable outlook over the necessary period to efficiently derisk the investment and progressively support the business case (10-15 years), with a clear budget framework, so that companies can orient themselves and plan accordingly.



More importantly across Europe, industrial nations are taking decisive steps to support carbon capture, utilization and storage (CCUS) through robust public financing mechanisms. Countries like the Netherlands, Germany, France, the UK, Denmark and Austria have launched dedicated, largescale support programs – most of them structured around long-term Contracts for Difference (CCfD) or competitive tenders per avoided tonne of CO₂:

- The Dutch SDE++ scheme, in place since 2020 allocates funding through competitive auctions with annual budgets exceeding €5-6 billion, supporting technologies including CCS, hydrogen and renewables.
- Germany's Klimaschutzverträge, launched in 2024, provide over €20 billion in four rounds, with contracts offering 15 years of support for carbon-reducing industrial transformations. Moreover, in October 2025, the government announced a new €6 billion CCfD auction targeting hard-to-abate sectors (e.g. steel, cement, chemicals, glass).
- France's AO GPID program focuses on deep decarbonization in hard-toabate sectors with 15-year contracts and strict performance monitoring, while the UK combines bespoke CfDs and cluster support, covering both CAPEX and OPEX.
- Denmark's CCS and NECCS funds, totaling more than €6 billion, include 8-20 year contracts and clawback mechanisms linked to ETS prices.

- Even smaller industrial economies like Austria have introduced targeted schemes (TDI) with €2.7 billion allocated via auctions between 2024 and 2030.
- Meanwhile, the EU itself has stepped up with its Innovation Fund auctions, offering fixed premiums for green hydrogen and opening opportunities for co-financing via national budgets.

These instruments can offer the investment certainty needed for breakthrough projects in energy-intensive sectors like steel, cement, lime, refining, chemicals and waste.

These examples show that there is now a dynamic continuum of support across Europe, ranging from a few billion euros for early-phase national programs, to tens of billions for comprehensive multi-year packages. Each program is tailored to national priorities, but all share a common logic: long-term support, competitive allocation, robust governance, and alignment with EU state aid rules.

For Belgium, Flanders and Wallonia, the situation is urgent if we want to stay attractive and competitive to be in the CCS race. Our industrial base is deeply integrated in European value chains - and faces the same decarbonization challenges. Without a matching policy response, we risk becoming a second-tier investment destination, as companies shift breakthrough projects to countries with better support mechanisms. It is necessary to ensure a level playing field/harmonization between all the mechanisms put in place in the neighboring countries, certainly in the context of specific state aid relating to the Clean Industrial Deal.



1.3 Solution for double penalty risk

One key challenge will also be the so-called "double penalty" risk for the value chain. This problem arises when a breakdown occurs in any part of the CCUS value chain — capture, compression, transport, liquefaction, shipping, storage — forcing the relevant operator (e.g. the emitters) to vent CO₂ at their site, wherever the problem happens in the value chain. Despite having invested in carbon reduction technologies, they are still held liable for EU Emissions Trading Scheme (ETS) compliance costs due to these unintended emissions. Simultaneously, they might continue to bear the capital and operational expenditures associated with their participation in the CCUS chain.

The situation is particularly unjust when the disruption stems from a third-party service provider or from operational failures outside the emitter's control, such as impurities in another emitter's CO2 stream affecting shared infrastructure. These costs are generally not or very partly covered by service contracts, as they are considered consequential damages. Moreover, they are extremely difficult to insure at competitive rates due to the uncertainty and systemic nature of the risks involved as well considering the innovative status of the different facilities and infrastructure. It also introduces significant uncertainty in financial planning, project bankability, and cross-border cooperation within industrial carbon networks.

It is essential for emitters to address the double penalty issue in order to unlock private investments in carbon capture, and storage (CCS). The best courses of action would be:

 Allocating a portion of the allowances held in the Market Stability Reserve (MSR)—specifically those scheduled for cancellation under the current regime—to establish a dedicated buffer. This buffer could be used to directly or indirectly cover emissions from leakage within the CCS value chain or forced venting due to any interruption in the value chain, thereby enhancing investor confidence and supporting the longterm viability of these projects.

This approach preserves the integrity of the ETS system, operates within the existing ETS cap, maintains expected financial revenues for Member States and avoids creating new costs for public authorities, providing a credible mechanism to de-risk leakagerelated liabilities. Moreover, the allocation should be designed to ensure that it does not negatively impact the triggering of the CSCF. Belgium shall urge the Commission to consider this proposal as part of the ongoing MSR review. A Strategic Leakage Response Buffer would enhance the resilience, credibility, and effectiveness of the EU ETS in the face of evolving climate infrastructure challenges.

 The establishment of a Europeanlevel guarantee mechanism or system of free allowances covering this risk up to a certain level. This would provide a safety net for



liabilities that cannot be resolved through commercial arrangements, particularly in cases where CO₂ leakage or system failure occurs. Funded through revenues from the EU Emissions Trading System (ETS), such a mechanism could operate similarly to an insurance scheme. It would ensure that emitters are not penalized twice first through ETS compliance / through fixed fees and/or "Inject of Pay" payments / through missed revenues (green premium or CDRs not sellable). By mitigating financial risk, especially during the early deployment of CCUS hubs and shared infrastructure, the guarantee mechanism would significantly enhance investor confidence.

Alternatively but not likely, a
 dispensation regime could be
 introduced to address involuntary
 CO₂ venting caused by failures in
 the CCUS chain. Under this system,
 ETS costs could be temporarily
 waived if emitters can prove they
 acted in good faith and participated
 fully in mitigation efforts.

Recognizing the urgency of enabling investment member states should not remain passive while Europeanlevel solutions such as an MSR-based Strategic Leakage Response Buffer or a European guarantee mechanism are debated.. Belgium should actively lobby at the European level to secure the adoption of structural solutions within the ETS, ensuring long-term credibility and bankability for CCS&T deployment across the Union. In the meantime, Belgium and its regions can play a vital role by offering targeted financial de-risking tools. These could include public

guarantees, subsidized insurance premiums, and access to carbon contracts for difference (CCfDs), all of which can help reduce the financial exposure of emitters. Crucially, these national measures must be anchored in a transparent and robust liability framework that clearly defines responsibilities across the CCS&T chain and under different failure scenarios.

1.4 Enabling policy levers

To develop CCS business cases, it is key to reduce and optimize the cost using all generic cost and benefit levers (which have also a positive impact on industry in general). In this regard, several essential enabling policy measures must be put in place. This calls for a clear message to policymakers: activate all available policy levers simultaneously. Only through a coordinated approach can the operational (OPEX) costs and risks be further reduced, thereby lowering the need for public funding support.

 Firstly, robust fiscal incentives are crucial to accelerating private investment in CCS. Policymakers should enable full or partial deductibility of CCS-related capital expenditures and implement accelerated depreciation schemes. These measures reduce upfront investment barriers and improve cash flow predictability. Such actions are fully in line with the EU's recommendation to support industrial decarbonization through targeted tax credits and fiscal tools that strengthen competitiveness while contributing to climate neutrality by 2050.



- Secondly, all CCS-projects are inherently energy-intensive, significantly increasing electricity consumption for capture, compression, and storage. Therefore, reducing energy-related costs is vital to improving project feasibility. Policymakers should align with the EU Affordable Energy Action Plan by minimizing energy taxes, levies, and surcharges for industrial CCS users. Participation in voluntary agreements, like Convention carbone or BM Convenanten, should also be taken into consideration. Ensuring access to affordable, abundant, reliable, low-carbon energy at a stable tariff will be essential to stimulate investment and enable large-scale deployment of CCS technologies.
- Thirdly, Europe must take a leading role in scaling up carbon capture and storage (CCS) as a key pillar of its decarbonization strategy. Although the current EU policy framework provides useful starting points, it still falls short in several critical areas and needs targeted improvements to support large-scale CCS deployment.
 - The Innovation Fund, for instance, should not only increase its support levels—ideally covering at least 80% of the additional costs for the innovative aspects of the project—but also incorporate flexible mechanisms that account for evolving economic conditions such as inflation or technological innovation. The current long lead time between application and financial close creates a bottleneck, particularly in a rapidly changing context.

- Furthermore, the Connecting
 Europe Facility for Energy could
 also be used to finance carbon
 infrastructures. The funding level is
 expected to increase considerably
 for the next EU budget from 5 to
 18 bn €.
- Stronger alignment between EU funding instruments and national policy objectives is essential to ensure faster and more efficient CCS project deployment within a coherent European value chain.
- Adequate and effective carbon leakage risk mitigation measures are important. If Belgian production is not internationally competitive, investors will not step in.
- Finally, to unlock CCS investment, public procurement and product carbon intensity standards should be used strategically to create lead markets. Governments should incorporate ambitious carbon footprint criteria into tenders—supporting low-carbon products and services through Green Public Procurement. This demand-side policy lever acts as a catalyst for innovation and scaleup by providing predictable market signals. It supports a market for green products allowing lower risk green (low carbon) investments by industrials. It also aligns with the goals of the Clean Industrial Deal, ensuring that public spending actively contributes to the growth of sustainable and decarbonized industrial value chains. To generate a much broader and structural leverage to facilitate CCS and other climate investments, focus should be on creating markets for low carbon products.



2. Policy governance

Governments have a critical role to play as neutral coordinators of the emerging CCUS ecosystem. Their responsibility is to provide a clear, predictable, and transparent regulatory framework, enabling emitters, transport operators, and storage providers to work together efficiently. This includes establishing shared technical specifications, defining liabilities, and setting out fair cost- and risk-sharing mechanisms.

Given the inherently cross-border nature of CO₂ transport and storage, authorities must also facilitate interregional and international collaboration. Interconnections with regions such as Zeeland, Hauts-de-France, and North Rhine-Westphalia, and with neighboring countries including the Netherlands, France, Germany, and Luxembourg, will be key to maximizing captured volumes and reducing costs for industry. Robust bilateral and EU-level agreements with storage-capacity countries-Norway, the Netherlands, the UK-are equally critical.

2.1 Interfederal Coordination

In Belgium, we underline the strategic importance of having a CO_2 transport backbone operational by 2029. This infrastructure is a precondition for the timely deployment of CCS and the decarbonization of heavy industries. To achieve this goal, a coordinated action plan must be developed and implemented without delay.

2.1.1 Coordination on regulatory and technical aspects

Regions play a central role, particularly in spatial planning, permitting, and industrial policy. Their early and active involvement is essential to the success of CCUS deployment. A coherent interfederal strategy must therefore align regional execution with federal objectives, while respecting Belgium's institutional framework. This includes ensuring a coordinated regulatory framework across the two regions in areas such as:

- Legal recognition of public interest for CO₂ infrastructure, both in terms of societal benefit and in facilitating permitting procedures.
- Technical safety standards, including emergency planning, designated buffer zones, technical specifications (depth, corrosion, inspection protocols), and risk assessment methodologies—ideally harmonized and inspired by the existing federal gas regulation.
- CO₂ emissions allowances and the legal basis for emitters to operate within defined frameworks.
- Coherent CO₂ specifications taking into account the emitters and exit terminal technical constraints.
- Grid deployment planning, with synchronization in timing and procedures between regions.
- Cost assessments for network expansion, ensuring transparency, non-discrimination, and similar methodologies in both regions.



2.1.2 Coordination on derisking and liabilities

Derisking strategies must also be aligned across regions and actors to ensure effective and aligned deployment. This includes mechanisms to support both infrastructure investments and emitters' investments through CO₂ capture.

- Carbon Contract for Difference (CCfD) programs must be aligned to provide fair and coherent support to emitters. Performance indicators such as abatement potential and cost per ton of CO₂ avoided—should be integrated to guide and evaluate public support mechanisms.
- Tariffs and contracts must be coordinated between regional regulators (CWaPE and VREG), while including CNO and emitters needs and perspectives.
- Liability frameworks need to be established: identifying risks, their probability, financial impact, and how responsibilities are shared among parties.

Based on these three different aspects, regional budget planning is critical. Both regions must set clear public funding trajectories to reassure industrial players. Transparent public investment planning will provide critical visibility to multiple stakeholders: emitters need clarity to take Final Investment Decisions (FID) on their carbon capture projects; neighboring countries must assess whether and how their CO₂ will transit through Belgium; and transport and storage players depend on reaching a minimum aggregated CO₂ volume—whether from

Belgian or cross-border sources—to justify FID on major infrastructure, both inland and offshore. The risk associated with delay is significant: if Belgium does not move quickly, German CO₂ volumes may be redirected through the Netherlands, which may have a negative impact on the development of a viable Belgian CCS backbone before 2040.

2.1.3 Achieving interfederal coordination

Achieving the necessary regulatory coherence and alignment of derisking strategies outlined above requires a structured and proactive approach to interfederal coordination. This involves establishing clear governance mechanisms, consistent dialogue between regions, and joint planning frameworks to ensure that all actors move in sync with the timeline of industrial investment decisions to be made in Belgium and neighboring countries.

1. A continuous and institutionalized dialogue and cooperation between industrial stakeholders, regional and federal authorities, and key institutional actors is essential to ensure regulatory coherence and aligned implementation across regions. While initial steps have been taken-particularly on regulatory aspects such as shared technical codes and harmonized legal definitions between regions, this dialogue must be significantly reinforced. It should not only address and improve regulatory alignment, but also extend to derisking mechanisms, including funding instruments, liability



- frameworks, and market-based support tools. This kind of dialogue, coordination and cooperation is the bare minimum to provide clarity and confidence to all actors involved.
- 2. Interfederal Plan "Make 2025-2030": While many dialogues are already underway, they remain too dispersed and fragmented. What is needed is a dedicated interregional platform to align these various conversations and exchanges and foster coherent action. The upcoming federal coalition agreement includes an "Industry" chapter focused on reindustrializing Belgium and an emphasis on developing strategic energy infrastructure, including a decision on CCS.Within this framework, working groups with an initial sixmonth mandate (renewable once) have been established to propose concrete and measurable actions.

This initiative (Make 2025-2030) presents a valuable opportunity to bring together all relevant stakeholders (federal and regional authorities, regulators, industry representatives, and institutional actors) to work together and in parallel on the different dimensions previously outlined, especially derisking and funding frameworks. Given the urgency of advancing on multiple fronts, we do not recommend delaying progress by negotiating a formal cooperation agreement at this stage. Instead, the priority should be on pragmatic, results-oriented collaboration through this platform.

3. Role of the CCPIE (Coordination Committee for International Environmental Policy)

Dialogue between the Flemish and Walloon administrations has begun through the Coordination Cell for International Environmental Policy (CCPIE), which is drafting a common CCUS framework based on working group contributions and shared priorities.

This administrative framework must be grounded in the political positions adopted through MAKE 2025-2030 and other working groups involving emitters and grid managers. To ensure coherence and relevance, the CCPIE should incorporate output from these groups and broaden its engagement to include emitters, private sector stakeholders, CO2 infrastructure manager, and other policymakers. Early input from these actors will enhance alignment with ongoing coordination efforts and is especially important given CCPIE's mandate to represent Belgium at the EU level where the position must reflect the practical and aligned realities of CCS development and deployment.

2.2 West-European Agreements

As previously mentioned, coordination with neighboring CO₂-emitting countries is essential to aggregate volumes and lower infrastructure costs. Early engagement with regions like North Rhine-Westphalia will help position Belgium as a preferred CO₂ transport route; without it, volumes risk being diverted through

the Netherlands, leaving Belgian infrastructure underutilized and potentially delaying a viable national network.

In parallel, coordination with countries that will host CO₂ storage sites is equally important. Norway remains a central partner, but proactive dialogue with the United Kingdom, the Netherlands and others must also be pursued to ensure access to diversified, competitive and secure storage options. Establishing early agreements or frameworks will provide clarity for project developers and help embed Belgium in the broader North-West European CO₂ value chain.

To seize this opportunity, Belgium must act with a unified voice through close cooperation between regional and federal authorities, engagement with industry, and a strong interfederal coordination mechanism that aligns domestic and cross-border priorities and technicalities. Governments should ensure that bi-lateral agreements under the London Protocol are in place with all key neighboring countries to allow cross-border transport of CO2 and that appropriate de-risking mechanisms are in place.

2.3 European Union

The EU is moving towards a harmonized framework for CCS.
Belgium must not wait. It must help shape the rules and prepare to align with them. Though the mature Belgian

projects, the country is legitime towards EU. This requires designing national systems now that reflect core EU principles: market access, transparency, derisking mechanisms and cross-border compatibility.

At the same time, Belgium must actively influence the development of the EU's regulatory framework for CCS. The CCPIE, mandated to represent Belgium at the EU level, must both carry a strong and coherent voice in Brussels and build that voice through inclusive national coordination. Indeed, these priorities must be co-defined through structured collaboration between political authorities, regulators, emitters, grid operators, and other private actors.

Moreover, the EU is not only a regulatory space—it is also a financial engine. With the upcoming 2028-2034 EU budget and a new competitiveness fund of hundreds of billions of euros under discussion, Belgium must act now to ensure its industries can fully benefit of this budget. This requires governments and administrations to anticipate EU funding rules, position projects accordingly, and provide the administrative and political support needed to access grants, subsidies, and incentives. To remain both competitive and compliant, Belgium must secure greater EU financial support—so that CCS projects can kick start, scale-up quickly and cost-effectively, while contributing to both climate goals and industrial resilience.





