

Dansk Offshores comments to the Call for evidence

Dansk Offshore, the Danish Industry Association for CO₂ storage license holders, welcomes the opportunity to comment on the Commission's call for evidence.

For Dansk Offshore it is vital to emphasize that Carbon Capture and Storage (CCS) is a new industry that needs to find its feet too. Hence the development must be driven by market forces.

As it is still too early to predict where everything will go, comprehensive economic regulation elements that would have an inhibiting/directly harmful effects on the development of CCS, should not be introduced by the Commission. That does not mean that we would not welcome regulatory support for the development of CCS. But caution should be shown.

Furthermore, Denmark was among the first EU Member States to adopt legislation on CCS, and we endorse the Danish model of a market driven approach to regulation. This model enables cost efficiency across the entire value chain while entrusting stakeholders with significant responsibility to establish viable agreements under market-based conditions. Also, regulatory intervention is applied only when necessary – and with a clear emphasis on supporting the full value chain.

Hence, we acknowledge the Commission's role in harmonizing cross-border projects, standardization, and the removal of transport barriers to ensure the development of a unified EU CO₂ market. But we also strongly advise the Commission to show caution, as reflected above.

With respect to specific elements of the call, Dansk Offshore has the following remarks regarding monopolies in the market:

- **Storage Capacity cannot** be characterized as a natural monopoly:
 - Multiple countries are currently issuing storage licenses to various project developers, stimulating competition and offering emitters plenty of choice. (As of July 2025, 24 storage projects have been announced in the EU and 53 when also including the UK and Norway). This indicates that there will be a sufficient number of independent providers of storage services in the future.
 - Furthermore, entry barriers are low. There are no technical or administrative barriers to entry: There are numerous potential storage fields to be explored, and permits are being granted. This can be even further improved through the initiative for a European storage atlas.
 - Storage companies have no incentive to reject customers and there is no basis for an obligation.

Sincerely

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