

Til Klima- Energi- og Forsyningssministeriet

Fra Dansk Offshore



21.02.25

Dansk Offshore (DO) hereby gives its comments to the below.

### Flexibility

DO advocates for more open wording and greater flexibility in the definition of a primarily used component. It may be more practical to allow inclusion of components **predominantly** intended for net-zero purposes which might not **always** be intended for net-zero purposes as the criteria currently suggests. For example, In Germany, in the CO2 Storage and Transportation Act the wording was "all components / installations used to operate (a CO2 pipeline)".

### Position on CCS technology

In the Delegated Act under CCS technology, there are no components listed as primarily used component because the available and commercial components are already used for 'non net-zero' applications therefore manufacturing of these components do not qualify under the act. Therefore, we provide comments towards the final products listed.

Dansk Offshore position:

1. Ask for inclusion of CO2 storage monitoring and CO2 storage through in-situ mineralisation as part of final products for storage technologies. In-situ mineralization offers a stable method to store CO2 in rock formations, ensuring its safe and permanent storage.
2. Inclusion of final product and components required for CO2 conditioning. These are required to prepare CO2 for transportation, storage or utilization. These include CO2 liquefaction units(trains) and CO2 purification units.
3. Ask for inclusion of CO2 ships among final products for CO2 transport - they provide a solution for transporting captured CO2 from regions without direct access to pipelines or storage facilities.

### CO2-pipeline analysis

Furthermore, in light of the statement, "*Additional policy effort is essential to secure the deployment of cross-border infrastructure planning*" (page 47) a taskforce should be established to identify

the most critical points for cross-border coordination and ensure funding for these projects.