

Unlocking CCUS in Eastern Europe: Aligning EU Policy, Funding and National Action

10 December 2025

Angelina Tomeshkova, Holcim Bulgaria

Regulatory Workshops in Bulgaria

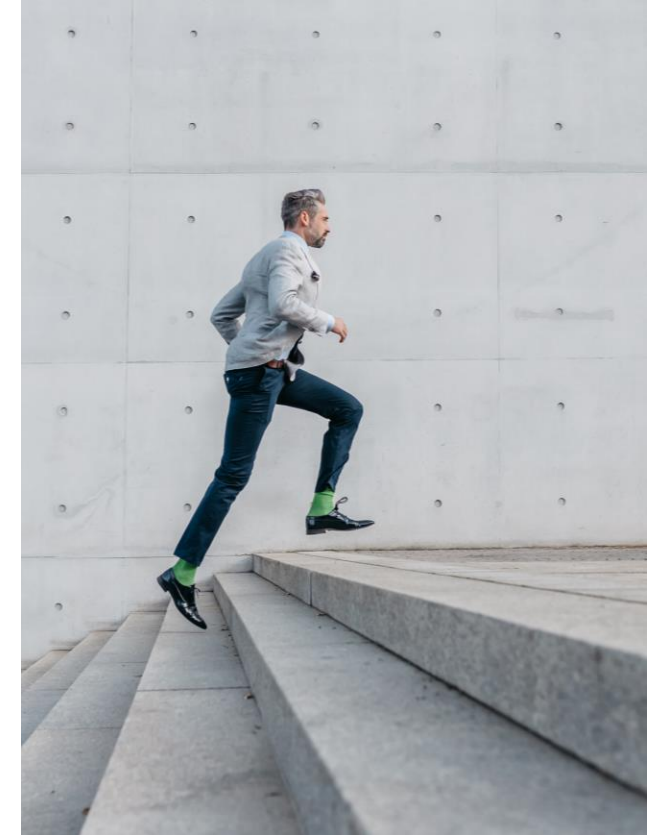


- 09.06.2025 – Workshop with the Ministry of Environment and Waters (24 participants)
- 30.09.2025 Regulatory workshop (38 participants):
 - Ministry of Environment and Waters
 - Ministry of Energy
 - Regional Environment Inspectorate Vratsa
 - Directorate for National Supervisory Control
 - State Agency for National security

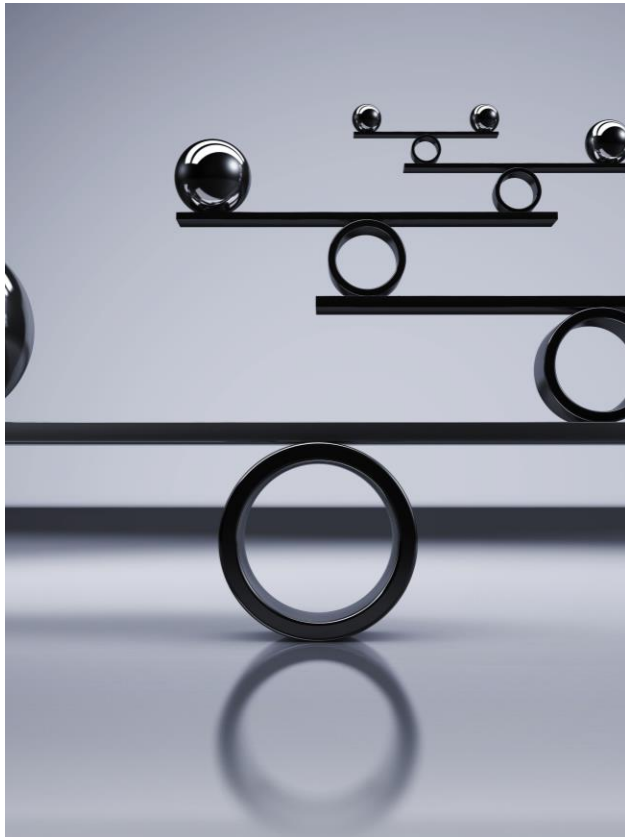
Regulatory gaps and obstacles identified in the legislation in Bulgaria

No national regulatory framework that :

- regulates the procedures and permit regime for the design and construction of CO₂ pipelines, including the preceding spatial planning procedures;
- regulates the technical rules and regulations for the design, construction and use of carbon dioxide transmission facilities and equipment;
- regulates the procedure and manner for determining the dimensions, location and special regime for exercising easements of facilities and infrastructure for the transmission of carbon dioxide.
- creates a legal opportunity to settle property relations with the owners of properties:
 - through which the CO₂ pipeline route passes
 - where construction and operation of injection wells, surface facilities and monitoring systems are located;
 - on which exploration activities are carried out (e.g. seismic surveys, drilling), even if a permit for exploration has already been issued.



Proposed amendments to BG legislation



- regulating statutory easement rights for transport, injection, and storage of carbon dioxide;
- introducing compulsory expropriation of private land or parts thereof for the purposes of exploration and storage of carbon dioxide;
- revoking the existing prohibition to transfer to third parties the rights and obligations arising from a granted exploration and storage permit.
- introducing technical rules and regulations for the design, construction, and use of facilities and installations for the transport, injection, and storage of carbon dioxide;

Proposed amendments to BG legislation – cont.

- establishing in the law the option of potential inclusion of CO₂ infrastructure among the projects eligible to be designated as national projects, which would trigger certain statutory benefits, such as shortened deadlines and single-instance appeal procedures, pre-execution of compulsory land expropriation, centralized approval of spatial plans and investment projects, centralized issuance of building permits, among others.



Planned new EU legislation



New regulatory package for CO2 transport:

- market and cost structures, cross-border integration, uniform technical standards and investment incentives for new infrastructure, third-party access, competent regulatory authorities, tariff regulation and ownership models
- minimum standards for the quality and composition of CO2 streams designated for transport and storage
- guidelines on ‘incidental associated substances’
- safety guidelines for CO2 transport by sea

Insights for the 1st regulatory workshop in Romania

Alexandra Dudu, GeoEcoMar

10 December 2025

Regulatory workshop in Romania

- **Date and location:** 13th November 2025, Bucharest
- **Topic:** Funding streams for cross border CO₂ storage and transport. Eastern Lights project opportunity
- **External participants:** ANRMPSG
- **Agenda**
 - Introductory session on status of CCS in Romania, Eastern Lights project and CO₂ storage and utilization with geothermal, public survey in Bulgaria
 - Overview of the EU Regulatory framework and mapping current European CO₂ storage projects
 - Funding streams for CCS cross-border projects (focused on developing the necessary infrastructure)



CCS in Romania

Opportunities

- Existing regulatory framework for CO₂ geological storage, recently updated
- 1st CCS project receiving funding under Innovation Fund
- CO₂ geological storage capacity onshore and offshore
- Fast-track permitting under NZIA

Challenges

- National CO₂ geological storage atlas
- Secondary legislation
- Infrastructure development (internal and cross-border)
- Test the permitting framework
- Public-private partnerships (contracts for difference)
- Public support

Further steps

1. Development of CO₂ storage atlases
2. Regulatory harmonization for cross-border cooperation
3. Establish joint pilot sites
4. Create a transboundary CO₂ transport framework
5. promote public awareness and stakeholder dialogue
6. Funding applications