

THOUGHT LEADERSHIP

## POLICY, LEGAL AND REGULATORY REVIEW

MID-2025 UPDATE AND PERSPECTIVE ON THE IMO'S NET ZERO FRAMEWORK

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# 1.0 CCS POLICY, LEGAL AND REGULATORY REVIEW – MAY 2025 UPDATE

Over the past six months, CCS initiatives in many global jurisdictions have advanced rapidly, while in others, CCS has faced challenges due to political and regulatory uncertainty. Global developments include:

- The establishment or refinement of legal frameworks for the regulation of CCS.
- Legal activities to allow cross-border transport for sub-seabed storage of CO<sub>2</sub>.
- The acceleration of regional and international collaboration, with new partnerships being formed to study and develop cross-border CCS value chains

   most notably across Europe, the Asia Pacific region and the Middle East.

The European Commission and the government of the United Kingdom (UK) have continued to support CCS through several policy and funding announcements. In May, the European Union and the UK also agreed to link their respective emissions trading schemes and exempt each other from climate tariffs under their Carbon Border Adjustment Mechanisms. Detail on specific developments is included in the following regional updates.

THE AMERICAS

EUROPE

ASIA PACIFIC

MIDDLE EAST & AFRICA



#### 1.1 The Americas

In the United States (US), CCS is facing uncertainties. Contributing factors include the Executive Order titled Unleashing American Energy that called for a pause on the disbursement of funds through the Inflation Reduction Act of 2022, under which the 45Q tax credit is granted (The White House, 2025); and the cancellation of direct financial support, such as the Department of Energy's US\$3.7 billion clean energy grants – many tied to CCS projects (US Department of Energy, 2025).

However, despite the uncertainty at the federal level, CCS activities are continuing at the state level. In February, the state of Wyoming became the fourth to receive primacy, and in April, the US Environmental Protection Agency (EPA) and Texas' Railroad Commission signed a Memorandum of Agreement outlining the state's plans for administering Class VI wells programmes. This is a required step in the primacy application process, for which the EPA is preparing a proposed approval (US EPA, 2025). In addition, Arkansas and Utah passed state laws that will govern CCS once these states have received primacy, and several more state laws that will enable CCS, have been passed in North and South Dakota, West Virginia, New Mexico, Oklahoma, and Wyoming.

New business models are also emerging, such as the strategic joint venture (JV) between Copenhagen Infrastructure Partners (CIP) and BKV. CIP has agreed to commit up to US\$500 million to be invested by the JV for use in designing, constructing and operating (carbon capture utilisation and storage (CCUS) projects across the US in exchange for up to a 49% interest in the JV. BKV has contributed to the JV its ownership of the Barnett Zero and Eagle Ford projects, and has committed to future contributions of CCUS projects, related assets and/or cash, in exchange for a 51% interest in the JV (BKV, 2025).

Following the enactment of their Fuels of the Future Bill, Brazil also enacted a law establishing the Brazilian Greenhouse Gas Emissions Trading System (SBCE) – a regulated carbon market with set sectoral emission caps.

#### **Timeline**

**NOV 2024 DEC 2024 JAN 2025 FEB 2025 MARCH 2025 APRIL 2025** Department of West Virginia receives Utah enacts HB 352 -The EPA approves Class VI Brazil's president signs a law creating a Transportation Class VI primacy. granting enforcement permits for Oxy's Stratos regulated carbon market (DOT) releases new project (1PointFive, 2025). authority over CO<sub>2</sub> (the SBCE) in Brazil comprehensive proposed injection wells (after Arkansas enacts HB (Government of Brazil, standards for CO<sub>2</sub> receiving primacy). 1411 and HB HB 1412 -Louisiana issues draft Class 2024). pipelines. respectively granting VI permit to Hackberry the state's Oil and Gas Wyoming enacts SF 0017 project (Public Notice, 2025) The new administration Commission the authority - stimulus programme for to regulate Class VI wells CO<sub>2</sub> used in enhanced oil calls for pause on The White House issues under the UIC program disbursement of funds recovery (EOR). a press release on Earth through the IRA and IIJA. (after receiving primacy) Day supporting "cuttingand clarifying the pipeline South Dakota enacts HB edge technologies like safety regulations for 1052 – prohibiting the use carbon capture ... ensuring transporting hazardous of "eminent domain" when America leads in both liquids or CO<sub>2</sub>. constructing/operating energy production and CO<sub>2</sub> pipelines. environmental innovation." West Virginia enacts SB Canada's Federal Government releases 627 – removing prohibition a DACCS federal against pore space leasing. offset protocol through **Environment and Climate** North Dakota enacts SB 2333 Change Canada for public establishing a low-carbon consultation. fuels fund, including CCS. Oklahoma passes HB New Mexico enacts HB 269. establishing a 458 – creating a regulatory regulatory framework for framework, designating CO<sub>2</sub> storage, and creating jurisdiction and authorities, a long-term stewardship permitting transfer of fund (Bill Track 50, 2025). stewardship to the state, and creating a long-term stewardship fund Indiana enacts SB 0457 well permitting requirements, fees for CO<sub>2</sub> storage operators, creates Funds for storage operations costs and long-term monitoring costs, respectively.

#### 1.3 Europe

Significant financial support for CCS has been announced in Europe, as set out in the timeline.

Two key regulations came into force in late 2024/early 2025, namely the Carbon Removals and Carbon Farming (CRCF) Regulation, establishing a Union certification framework for permanent carbon removals, carbon farming, and carbon storage in products (European Commission, 2024a); and the Corporate Sustainability Reporting Directive under which companies are required to disclose their greenhouse gas emissions (scope 1, 2 and 3) (European Commission, 2025b).

In March, the European Commission launched a public consultation on the draft delegated regulation related to the Net Zero Industry Act (NZIA). Via this delegated regulation, the Commission aimed to specify rules on the identification of authorised oil and gas producers who are required to contribute to the objective of reaching the set target of 50 Mtpa of CO<sub>2</sub> injection capacity by 2030; the calculation of their respective contributions; and their reporting obligations. In May, the European Commission published a revised contribution schedule, indicating the contributing organisations and their respective contributions to the 2030 target (European Commission, 2025b).

Several public consultations have been launched, including on the future review of the EU Emissions Trading System (ETS) and the Market Stability Reserve. Key topics explored in the consultation are the integration of carbon dioxide removals (CDR) within the EU ETS, the expansion of the EU ETS's scope towards municipal waste incineration plants, and the potential future linkage of the EU ETS with other carbon markets. The European Commission also launched a consultation on its draft state aid framework accompanying the Clean Industrial Deal (CISAF). Under CISAF, the Commission aims to advance the roll-out of renewable energy, deploy industrial decarbonisation through, for instance, CCS and ensure sufficient capacity of clean tech manufacturing in Europe. The consultation closed in April.

At the EU-UK Summit in May, the European Commission and the UK government agreed to link their respective emissions trading systems, and to exempt each other from climate tariffs under the Carbon Border Adjustment Mechanism.

#### **Timeline**

NOV 2024 DEC 2024 JAN 2025 FEB 2025

- Regulation establishing the first EU-wide voluntary framework for certifying carbon removals, carbon farming and carbon storage in products across Europe enters into force.
- The Innovation
  Fund's Net Zero
  Technologies and
  Battery calls, with a
  total budget of €3.4
  billion (€2.4 billion
  to be allocated to
  the Net-Zero Call
  and €1 billion to be
  granted to the Battery
  Call) (European
  Commission, 2024b).
- Approval of a French
  State aid scheme with
  a maximum amount of
  €3 billion to support
  decarbonisation of
  industrial sectors
  over a period of 15
  years (European
  Commission, 2024c).

billion allocated to 41 cross-border energy infrastructure projects, including in CO₂ transport and storage, as part of the results of the Connecting Europe Facility for Energy (CEF-E) funding call launched in April 2024 (European

Commission, 2025a).

- Commission outlines its 2025 Work Programme.
- Commission
  publishes its
  Communication on
  the Clean Industrial
  Deal.
- A €2.3 billion Finnish scheme to support investments in strategic sectors (including CCUS) and to help industrial companies decarbonise production
   processes (European Commission, 2025c);
- A €5 billion German state aid scheme to help industries decarbonise production processes. The scheme is aimed at helping German industry reduce CO₂ emissions in production processes by adopting a wide range of technologies, including hydrogen, CCS and CCU (European Commission,

**MARCH 2025** 

**APRIL 2025** 

A €960 million Czech scheme to support investments in strategic sectors, including CCUS (European Commission, 2025d);

2025e);

- The launch of a €600 million call for proposals to support key cross-border EU energy infrastructure projects included in the list of projects of common interest and projects of mutual interest. Among the projects eligible for funding under the CEF-E are initiatives in the field of CO₂ networks and hydrogen (Global CCS Institute, 2025)
- Draft state aid framework accompanying the Clean Industrial Deal (CISAF) submitted to open consultation.
- Net-Zero Industry Act (NZIA) draft delegated regulation opened for feedback.
- EU Commission's public consultation opened, in anticipation of EU ETS review.

EU Commission and UK government agree to link their ETSs (Government of the UK, 2025).

**MAY 2025** 



#### 1.5 Asia Pacific

The Asia Pacific region has seen accelerated collaboration in the cross-border movement of CO<sub>2</sub> for sub-seabed storage, as well as carbon credit trading. Several partnership and cooperation agreements have been signed between industry players and with governments in the region to develop cross-border value chains, or to export and import CO<sub>2</sub> for permanent storage (see timeline). National and international oil and gas companies are seizing the opportunity to expand their CCS operations by partnering with governments in the region.

Carbon markets are expanding, with Indonesia and New Zealand both including CCS in their ETSs. Indonesia is also positioning itself for international carbon credit trading and has opened the Indonesian Carbon Exchange (IDXCarbon) for this purpose.

In February, China released its Fifth National Catalogue of low-carbon technologies, which included CCUS. Several working plans supporting CCS have also been issued, including:

- The National Financial Regulatory Administration and People's Bank of China issued a working plan on promoting green finance in banking and insurance sectors where CCUS is one of the supported areas (China State Administration of Financial Supervision and Administration, 2025).
- MEE issued a working plan to expand its compliance market to steel, cement and aluminium sectors (China Ministry of Ecology and Environment, 2025b).
- The National Development and Reform Commission (NDRC) and the National Energy Administration (NEA) issued a working plan on retrofitting the new-generation cola power plants and CCUS is included as one of the retrofitting solutions (China Department of Energy, 2025).

China signed a Memorandum of Understanding (MoU) with the UK to cooperate on energy, including CCUS. In May, ASEAN, China, and the Gulf Cooperation Council (GCC) countries released a joint statement to foster closer ties in various areas, including policy, regulatory frameworks and knowledge exchange on energy security and sustainability – with CCUS and low-carbon hydrogen included among other technologies.

In February, Japan issued its Seventh Energy Strategy Plan, promoting the decarbonisation of thermal power through the use of hydrogen, ammonia, CCUS and other technologies. The Ministry of Economy, Trade and Industry (METI) designated an offshore area, off the coast of Tomakomai City, as a specified area under the CCS Business Act.

#### **Timeline**

**NOV 2024 DEC 2024** 

#### **JAN 2025**

#### **FEB 2025**

#### **MARCH 2025**

#### **APRIL 2025**

#### **MAY 2025**

Australia ratifies the 2009 amendment of the London Protocol in November 2024 (Global CCS Institute, 2024). Several partnership and cooperation agreements have been signed with Australia, following the ratification.

Indonesia opens its international carbon exchange platform and launched a mandatory ETS, including CCS (AFP, 2025).

Indonesia and ExxonMobil sign a MoU to develop a CCS value chain, at an estimated investment value of US\$10 billion (Invest Indonesia, 2025) - an example of industry players seeking to collaborate with governments to develop CCS value chains.

China releases its Fifth National Catalogue of lowcarbon technologies (China Ministry of Ecology and Environment, 2025a).

Japan issues its Seventh Energy Strategy Plan (METI, 2025).

Japan designates an offshore area as a specified area under the CCS Business Act (Carbon Herald, 2025).

Malaysia – a country with significant CO<sub>2</sub> storage capacity passes its CCUS Bill in March. The Bill is comprehensive and covers all aspects across the CCS value chain and will apply to both onshore and offshore storage (CCUS Bill 2025, 2025). The Bill excludes Sabah and Sarawak.

China and UK sign MoU on energy cooperation (Global Times, 2025).

Petronas signs memoranda of understanding with nine countries among them Japan and South Korea – to store their excess CO<sub>2</sub> emissions in depleted fossil fuel sites off the coast of peninsular Malaysia and Sarawak (Energy News. 2025).

China releases Malaysia and several working Japan reaffirm their plans supporting commitment to advancing regional decarbonisation and sustainable growth under the Asia Zero

> New Zealand releases a new policy framework, the Enabling CCUS package, introducing regulatory guidance and incentives for investment in carbon capture technology, and aiming to include CCS in the domestic emissions trading scheme (NZ ETS)

**Emissions Community** 

(AZEC) initiative.

ASEAN, China and the GCC release a joint statement to cooperate on areas including CCUS (China.org.cn, 2025).

(George, 2025).



#### 1.7 Middle East and Africa

Several countries in the Middle East are stepping up efforts to deploy CCS. In a first for the region, in November 2024, DNV certified the feasibility of ADNOC's West Aquifer  $CO_2$  storage site, marking a significant milestone for the region. There has also been a surge in cross-border collaborations to develop shared infrastructure, expand carbon credit trading platforms, and integrate innovative technologies (like DAC and  $CO_2$  mineralisation) into broader decarbonisation strategies.

#### Timeline

NOV 2024 PEB 2025 APRIL 2025

ADNOC's CO<sub>2</sub> site in the UAE receives first storage certification issued in the Middle East.

Saudi Arabia and France sign MoU to form the Strategic Partnership Council between the two governments, which aims to bolster cooperation in key sectors including energy transition (Faraj, 2024). The Egypt-Greece MoU on CCS aims to reduce emissions in the energy sector (State Information Service Egypt, 2025).

OQGN and Gasunie sign MoU to develop a hydrogen corridor and collaborate on CCS initiatives, aiming to link Oman's hydrogen and carbon infrastructure with European demand centres (OSW, 2025).

Qatar's unveils a comprehensive action plan targeting a reduction of 37 million tonnes of CO<sub>2</sub> by 2030, signalling increased opportunities for CCS and low-carbon technologies (The Peninsula, 2025).

South Africa's 2025 budget introduces an expanded carbon offset mechanism, potentially boosting demand for verified carbon credits and CCS solutions (Bizcommunity.com, 2025).





## 2.0 IMPACT OF THE IMO'S NEW NET-ZERO FRAMEWORK ON INTERNATIONAL SHIPPING

### 2.1 Adoption of the Net-Zero Framework

In April 2025, the International Maritime Organization (IMO) agreed a legally binding framework to accelerate emissions reduction from shipping. The IMO's Net-Zero Framework introduces technical and economic measures to facilitate the decarbonisation of the international maritime sector, through which the IMO aims to:

- Reduce greenhouse gas (GHG) emissions from international shipping by at least 20% (striving for 30%) by 2030 and at least 70% (striving for 80%) by 2040 compared to 2008 levels; and to reach net zero by or around 2050, as per its strategy adopted in 2023 (IMO, 2023).
- Ensure zero or near-zero emission technologies, fuels and/or energy sources will constitute at least 5% (striving for 10%) of the energy used in international shipping by 2030 (IMO, 2023).
- Implement a new global fuel standard for ships, under which they must measure and reduce their annual GHG fuel intensity<sup>1</sup> (GFI) over time (IMO, 2025).
- Establish an economic mechanism requiring ships exceeding GFI thresholds to acquire remedial units to offset excess emissions, while pricing financial incentives for ships utilising zero or near-zero GHG fuels or technologies (IMO, 2025). The financial rewards for the use of these fuels/technologies will be decided by 1 March 2027.
- Implement a global carbon tax on shipping emissions, imposing a fee of US\$100 per tonne of CO<sub>2</sub> emitted beyond the set thresholds. The revenue generated will be used to support the transition to cleaner shipping technologies, reward low-emission vessels, and assist developing nations to decarbonise (McDermott & Arasu, 2025).

The IMO's Net-Zero Framework is the first in the world to combine a carbon price, mandatory emissions limits and a trading mechanism across a specific sector.

The framework includes a comprehensive set of regulations that will be mandatory for large oceangoing ships over 5,000 gross tonnage that emit 85% of their total  $CO_2$  emissions from international shipping. Categories of ships exempt from these regulations include ships operating only in domestic waters, ships that are not using mechanical propulsion, floating production, storage and offloading (FPSOs), floating storage units (FSUs), drilling rigs, and semi-submersible vessels (Henderson, 2025).

The regulations are set to be formally adopted in October 2025 before entering into force in 2027. The framework will be incorporated into a new Chapter 5 to the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI, making the regulations legally binding and enforceable across the global shipping industry. (IMO, 2025).

 $<sup>^1</sup>$  The GFI is the GHG intensity of the energy used onboard a ship. This comprises the energy from the fuel, from other sources, e.g. wind-assisted propulsion, and savings in emissions from technology such as carbon capture. The GFI is a measure of the grams of CO<sub>2</sub> or CO<sub>2</sub> equivalent, i.e. methane, nitrous oxide, per megajoule of energy; the unit is  $gCO_2e/MJ$  (Henderson, 2025).



#### 2.2 Enforcing compliance

The framework imposes two levels of compliance with the set GFI targets – a Base Target and a Direct Compliance Target. These targets are aligned with the "base" and "striving for" targets contained in the IMO's 2023 GHG Strategy. Trajectories for these targets have been agreed from 2028 to 2035, as depicted in Figure 1.

Under the regulations, ships will be obliged to report their weighted average GFI, as well as their Compliance Balance<sup>2</sup>, by March each year for the previous calendar year. Ships with an Attained GFI at or below the Direct Compliance Target will be eligible to earn "surplus units", which can be banked for future use or sold to other ships. Ships with an Attained GFI above the Direct Compliance Target but below the Base Target (Tier 1 Compliance Deficit) will be obliged to offset their excess emissions through buying remedial units from the IMO's Net-Zero Fund at the initial price of US\$100/unit. Ships with an Attained GFI above the Base Target (Tier 2 Compliance Deficit) will have to purchase remedial units from the IMO's Net-Zero Fund at the higher price of US\$380/ unit for the deficit between the Attained GFI and the Base Target, as well as remedial units at US\$100/unit for the deficit between the Base Target and the Direct Compliance Target. Remedial units can also be purchased from other ships, or surplus units, previously banked, can be used (Henderson, 2025).

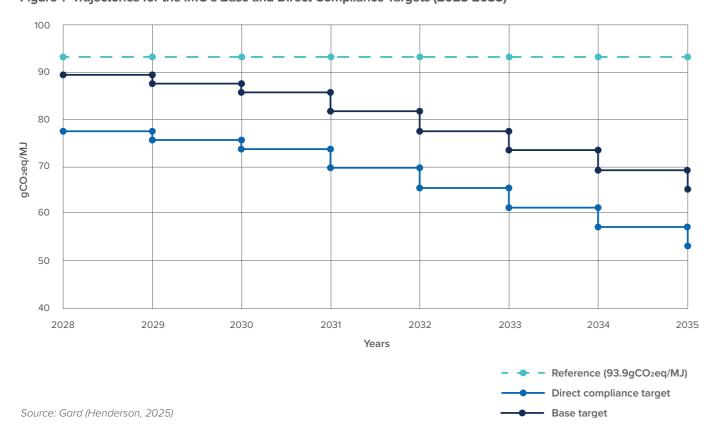
#### 2.3 Establishment of the Net-Zero Fund

The IMO will establish the Net-Zero Fund to collect fees from ships that emit above the Base Target. These fees will be used to:

- Reward ships with emissions below the Direct Compliance Target.
- Support innovation, research, infrastructure, and justtransition activities in developing countries.
- Fund training, technology transfer and capacity building to support the IMO's GHG Strategy.
- Mitigate negative impacts on vulnerable states such as Small Island Developing States (SIDS) and Least Developed Countries (LDCs).

The IMO estimates that it will be able to generate revenues of US\$11-13 billion annually from fees payable for excess emissions.





<sup>&</sup>lt;sup>2</sup> The Compliance Balance is the difference between the Direct Compliance Target and the ship's Attained GFI, multiplied by the total energy used that year measured in tonnes of CO<sub>2</sub>-e

### 2.4 Impact of the new regulations on international shipping

The mandate to reduce emissions according to an agreed trajectory will likely prompt investment in research and development of energy-efficient technologies and alternative fuels. Companies investing early in low-carbon technologies will gain a competitive advantage, while those delaying adaptation could face higher operational costs, potential penalties for excess emissions, and potential market exclusion. Shipping companies should assess their fleet readiness early, and leverage support from national funding programmes or the IMO's Net-Zero Fund (Rosenoegger, 2025).

CCS can play a major role in the decarbonisation of shipping. A ship's exhaust, as a point source of  $CO_2$ , can be combined with a carbon capture system to address a significant proportion of  $CO_2$  emissions through onboard carbon capture (OCCS) (Offshore Energy, 2025). OCCS is currently an area of active research and development, with demonstration projects underway or already completed, such as the EverLoNG (Everlong, 2025) and REMARCCABLE (OGCl, 2024) projects. These projects aim to clarify how much  $CO_2$  could be mitigated, the impact of OCCS on the ship's structure and operation, and the cost competitiveness of OCCS, compared with alternative decarbonisation options.

The shift towards low-emission fuels will also necessitate the development of new bunkering infrastructure and supply chains. Ports and related facilities will need to adapt to accommodate alternative fuels. This will have a knock-on effect on global maritime logistics. Regions that are better prepared for the transition to low-carbon fuels may gain advantages, which could reshape trading patterns.

Enforcement of the new global GFI standards will also require robust monitoring and reporting mechanisms. Shipping companies will need to enhance their data collection and reporting capabilities to demonstrate compliance, potentially increasing the administrative burden. Although certain aspects of the regulations, such as the pricing mechanism's final design, are yet to be finalised, and emission reduction trajectories post 2035 still to be agreed, the new regulations are set to have a profound impact on future international shipping and trading.



#### 3.0 REFERENCES

- 1. 1PointFive. (2025, April 7). Occidental and 1PointFive Secure Class VI Permits for STRATOS Direct Air Capture Facility. https://www.1pointfive.com/news/occidental-and-1pointfive-secure-class-vi-permits-for-stratos-direct-air-capture-facility
- 2. AFP. (2025, January 20). Indonesia launches international carbon exchange. https://www.thejakartapost.com/business/2025/01/20/indonesia-launches-international-carbon-exchange.html
- 3. Bill Track 50. (2025, May). OK SB269. https://www.billtrack50.com/billdetail/1763452
- 4. Bizcommunity.com. (2025, April 10). Updated carbon tax framework and its impact on high-emission industries. https://www.zawya.com/en/special-coverage/zawya-green/updated-carbon-tax-framework-and-its-impact-on-high-emission-industries-h0veg0ss
- 5. BKV. (2025, May 8). BKV and Copenhagen Infrastructure Partners Announce Strategic Carbon Capture Joint Venture With Up To \$500 Million Investment. BKV. https://www.bkv.com/news/bkv-and-copenhagen-infrastructure-partners-announce-strategic-carbon-capture-joint-venture-with-up-to-500-million-initial-investment
- 6. Carbon Capture, Utilisation And Storage Bill 2025 (2025). https://myccus.ekonomi.gov.my/media/
- 7. Carbon Herald. (2025, February 24). Japan Designates First Carbon Capture And Storage Site. https://carbonherald.com/japan-designates-first-carbon-capture-and-storage-site/
- 8. China Department of Energy. (2025, March 26). Implementation Plan for the Special Action for the Upgrading of the New Generation of Coal-fired Power (2025-2027). https://www.ndrc.gov.cn/xxqk/zcfb/tz/202504/t202504/t
- 9. China Ministry of Ecology and Environment. (2025a, February 12). Catalogue of Low-carbon Technologies for National Key Promotion. https://www.mee.gov.cn/xxqk2018/xxqk/xxqk06/202502/t20250212\_1102102.html
- China Ministry of Ecology and Environment. (2025b, March 20). Work Plan for the National Carbon Emission Trading Market to Cover the Steel, Cement and Aluminum Smelting Industries. https://www.mee.gov.cn/xxgk2018/xxgk/xxgk03/202503/ t20250326\_1104736.html
- China State Administration of Financial Supervision and Administration. (2025, January 17). Implementation Plan for the High-quality Development of Green Finance in the Banking and Insurance Industry. https://www.nfra.gov.cn/cn/view/pages/ltemDetail. html?docld=1199877&itemId=928&generaltype=0
- 12. China.org.cn. (2025, May 28). Joint Statement of the ASEAN-China-GCC Summit. http://www.china.org.cn/world/Off\_the\_Wire/2025-05/28/content\_117900096.shtml
- 13. Energy News. (2025). Carbon colonialism? Malaysia and Indonesia plan storage hubs for Asian emissions. https://www.climatechangenews.com/2025/03/20/carbon-colonialism-malaysia-and-indonesia-plan-storage-hubs-for-asian-emissions/#:~:text=Malaysia%E2%80%99s%20oil%20company%20Petronas%20has%20signed%20at%20least,Borneo%20island%2C%20in%20the%20gas-producing%20region%20of%20Sarawak.
- European Commission. (2024a, November 27). Regulation (EU) 2024/3012 of the European Parliament and of the Council. Official Journal of the European Union. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\_202403012
- 15. European Commission. (2024b, December 3). Call for proposals. https://climate.ec.europa.eu/eu-action/eu-funding-climate-action/innovation-fund/calls-proposals\_en
- European Commission. (2024c, December 18). Commission approves French State aid scheme to support decarbonisation of industrial sector. https://ec.europa.eu/commission/presscorner/detail/en/ip\_24\_6434
- 17. European Commission. (2025a, January 30). EU invests over €1.2 billion in cross-border infrastructure contributing to build our Energy Union and to boost competitiveness. https://ec.europa.eu/commission/presscorner/detail/en/ip\_25\_377
- 18. European Commission. (2025b, February). Corporate sustainability reporting. https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting\_en
- 19. European Commission. (2025c, February 18). Commission approves €2.3 billion Finnish State aid scheme to foster the transition to a net-zero economy. https://ec.europa.eu/commission/presscorner/detail/en/ip\_25\_527
- 20. European Commission. (2025d, March 18). Commission approves €960 million Czech State aid scheme to support investments in strategic sectors. https://ec.europa.eu/commission/presscorner/detail/en/ip\_25\_781
- 21. European Commission. (2025e, March 24). Commission approves €5 billion German State aid scheme to help industries decarbonise production processes. https://ec.europa.eu/commission/presscorner/detail/en/ip\_25\_846
- 22. European Commission. (2025f, May 22). Commission identifies the EU oil and gas producers to provide new CO<sub>2</sub> storage solutions for hard-to-abate emissions in Europe.
- 23. Everlong. (2025). Everlong About the Project. https://everlongccus.eu/about-the-project
- Faraj, Y. A. (2024, December 3). Saudi Arabia, France form strategic partnership council to bolster cooperation in key sectors. https://economymiddleeast.com/news/saudi-arabia-france-form-strategic-partnership-council-to-bolster-cooperation-in-key-sectors/

- 25. George, V. (2025, May 7). New Zealand Unveils Groundbreaking Carbon Capture Policy.
- 26. Global CCS Institute. (2024, November 7). Australia Advancing Cross-Border Carbon Capture and Storage: Ratification of the 2009 Amendment to the London Protocol. https://www.globalccsinstitute.com/news-media/latest-news/australia-advancing-cross-border-carbon-capture-and-storage-ratification-of-the-2009-amendment-to-the-london-protocol/
- 27. Global CCS Institute. (2025, April 9). New funding made available to CCS initiatives via the 2025 CEF-E call for PCIs and PMIs. https://www.globalccsinstitute.com/news-media/latest-news/new-funding-made-available-to-ccs-initiatives-via-the-2025-cef-e-call-for-pcis-and-pmis/
- 28. Global Times. (2025, March 17). Chinese, UK ministers hold dialogue on energy cooperation. https://www.globaltimes.cn/page/202503/1330292.shtml
- 29. Government of Brazil. (2024, December 12). President Lula signs law creating regulated carbon market in Brazil. Gov.Br. https://www.gov.br/planalto301/en/latest-news/2024/12/president-lula-signs-law-creating-regulated-carbon-market-in-brazil
- 30. Government of the UK. (2025, May). SPS AGREEMENT. Gov.UK. https://www.gov.uk/government/publications/ukeu-summit-key-documentation/uk-eu-summit-explainer-html
- 31. Henderson, N. (2025). The IMO interim emission measures: an overview. https://gard.no/insights/the-imo-interim-emission-measures-an-overview/
- 32. International Maritime Organization. (2023, July 7). Revised GHG reduction strategy for global shipping adopted. IMO. https://www.imo.org/en/MediaCentre/PressBriefings/pages/Revised-GHG-reduction-strategy-for-global-shipping-adopted-.aspx
- 33. International Maritime Organization. (2025, April 11). IMO approves net-zero regulations for global shipping. IMO. https://www.imo.org/en/MediaCentre/PressBriefings/pages/IMO-approves-netzero-regulations.aspx
- 34. Invest Indonesia. (2025, January 23). Indonesia, ExxonMobil Sign MoU for CCS Development. https://investindonesia.co.id/2025/01/23/indonesia-exxonmobil-sign-mou-for-ccs-development/#:":text=Indonesia%E2%80%99s%20Coordinating%20 Minister%20for%20Economic%20Affairs%2C%20Airlangga%20Hartarto%2C,10%20billion%2C%20according%20to%20 reporting%20from%20Antara%20News.
- 35. McDermott, J., & Arasu, S. (2025, April 12). Major nations agree on first-ever global fee on greenhouse gases with plan that targets shipping. AP News. https://apnews.com/article/shipping-emissions-climate-change-98ff23ca4739d8b4fc5a8f941a7ca0c4
- 36. METI. (2025, February 18). Cabinet Decision on the Seventh Strategic Energy Plan. https://www.meti.go.jp/english/press/2025/0218 001.html
- 37. Offshore Energy. (2025, January 17). 'World's first' ship with full-scale onboard CCS ready for pilot testing. https://www.offshore-energy.biz/worlds-first-ship-with-full-scale-onboard-ccs-ready-for-pilot-testing/
- 38. OGCI. (2024). Project REMARCCABLE Key Findings. https://www.ogci.com/wp-content/uploads/2024/10/Key-Findings-FINAL.pdf?hsCtaAttrib=180391783762
- 39. OSW. (2025, April 16). OQGN, Gasunie ink MoU on hydrogen corridor and CCUS. https://omansustainabilityweek.com/newfront/news/oqgn-gasunie-ink-mou-on-hydrogen-corridor-and-ccus
- $40. \ \ Public\ Notice\ (2025).\ https://www.dnr.louisiana.gov/assets/OC/ClassVI/Public\_Hearings/Public\_Notice\_Hackberry\_ClassVI.pdf$
- 41. Rosenoegger, J. (2025, April 12). IMO Net-Zero Regulations What's New and Critical for Shipping Companies. Maritime Innovations. https://maritime-innovations.com/imo-net-zero-regulations-2025-shipping-impacts/
- 42. State Information Service Egypt. (2025, February 18). Egypt signs MoU on carbon capture & storage with Greece. https://beta.sis.gov.eg/en/media-center/news/egypt-signs-mou-on-carbon-capture-storage-with-greece/#:~:text=Minister%20of%20 Petroleum%20and%20Mineral%20Resources%20Karim%20Badawy,that%20it%20does%20not%20contribute%20to%20 climate%20change.
- 43. The Peninsula. (2025, April 13). Action plan eyes to cut 37 million tonnes of CO<sub>2</sub> by 2030. https://thepeninsulaqatar.com/article/13/04/2025/action-plan-eyes-to-cut-37-million-tonnes-of-CO<sub>2</sub>-by-2030
- 44. The White House. (2025, January 20). Unleashing American Energy. The White House. https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/
- 45. US Department of Energy. (2025, May 30). Secretary Wright Announces Termination of 24 Projects, Generating Over \$3 Billion in Taxpayer Savings. US Department of Energy. https://www.energy.gov/articles/secretary-wright-announces-termination-24-projects-generating-over-3-billion-taxpayer
- 46. US EPA. (2025, April 29). EPA and Texas Railroad Commission Sign Memorandum of Agreement on Geologic Storage of Carbon Dioxide. https://www.epa.gov/newsreleases/epa-and-texas-railroad-commission-sign-memorandum-agreement-geologic-storage-carbon





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