ENTSOG Consultation – Annual Work Plan

September 2025

The ENTSOG Annual Work Programme 2026 (AWP) presents the planned activities of the European Network of Transmission System Operators for Gas (ENTSOG) for the year 2026. It is prepared under Regulation (EU) 2024/1789 as part of the Hydrogen and Decarbonised Gas Market Package. The document details the regulatory, strategic, and technical tasks ENTSOG will undertake to support EU energy policy goals: security of supply, decarbonisation, market integration, and infrastructure adequacy.

As part of its stakeholder engagement, ENTSOG initiates a public consultation process to obtain feedback which will shape its work programme to represent the most significant priorities for 2026. The Carbon Capture and Storage Association (CCSA) views this consultation process as essential to secure sufficient attention for carbon capture utilisation and storage (CCUS) and CO_2 transport infrastructure in ENTSOG's planning activities.

Given the fast-evolving political and regulatory landscape for industrial carbon management and CCUS in Europe, it is essential that ENTSOG's AWP reflects the importance of CO_2 transport, storage-readiness, and cross-border CCUS infrastructure as part of the energy transition.

Response to AWP 2026 Consultation

1. Does the AWP 2026 adequately identify activities which ENTSOG should prioritise?

ENTSOG's AWP 2026 prioritises the integration of low-carbon gases and the repurposing of gas infrastructure, in line with EU decarbonisation goals. The inclusion of CO_2 transport in the Energy Transition and Interoperability sections is welcome and shows an awareness of the importance of carbon management infrastructure.

However, CCUS is addressed only through the lens of CO_2 transport technical standardisation. There is no holistic treatment of CCUS as a complete value chain, which is essential if ENTSOG is to fully support the EU's 2040 climate targets, net-zero objectives, and the ambitions of the Industrial Carbon Management Strategy (ICMS).

Key missing prioritisation:

- No clear articulation of CCUS as a strategic infrastructure priority on par with hydrogen.
- No forward planning for CCUS infrastructure in the TYNDP 2026 or the upcoming TYNDP 2028.
- No coordination efforts with CO_2 storage stakeholders, which undermines system-level planning.

2. Are there any other activities that should be included in the AWP 2026, or activities which should take priority within the document?

Several activities should be either added or elevated:

(a) **Include CCUS as a distinct workstream across AWP areas**

- ENTSOG should establish a dedicated CCUS/CO_2 infrastructure planning taskforce, not just standardisation activity under interoperability.
- There should be a specific section or deliverables on:
    - **Mapping the role of CO_2 transport routes and corridors**. This deliverable should be clearly modelled on the existing "*Hydrogen Infrastructure Map Europe*", providing a similarly structured and visual overview of developing CO_2 pipeline infrastructure. The creation of this map would support the identification of **early projects clusters** and potential **interconnections** as well as would provide visibility for policymakers and projects developers.
    - **Infrastructure Map** should also reflect related assets such as **CO_2 import/export terminals and hubs**, which will be vital to connect emitters not yet linked to the pipeline grid. Non-pipeline modes (ship, rail, truck) are outside ENTSOG's scope, but their role as interim or complementary transport options should be acknowledged in the mapping exercise.

(b) **TYNDP planning and scenarios**

- ENTSOG should include CO_2transport infrastructure as a separate chapter or annex in the TYNDP 2026.
- We acknowledge and support the idea of **generating CO_2 demand profiles** and recommend that ENTSOG consider beginning **preliminary work** in this area, **if feasible**. Nonetheless, there is strategic value in **starting to explore possible CO_2 flow scenarios**, particularly in relation to industrial cluster decarbonisation and potential cross-border transport volumes. Even limited scoping or initial data gathering in this area during 2026 could help inform future TYNDPs and policy frameworks.

(c) **Stakeholder engagement**

- We recognise that many **gas TSOs are already engaging with CO_2 storage developers and major emitters**, and that these interactions are happening through ICMS consultations, regional project development, and bilateral initiatives. We do not propose additional coordination requirements in 2026 but encourage ENTSOG to remain supportive of **existing cooperation pathways**.

3. Do you have any additional general comments?

ENTSOG is well-positioned to play a critical role in delivering the infrastructure underpinning the EU's climate transition. Their AWP 2026 shows strong momentum on hydrogen and biomethane, but carbon capture and storage must be integrated on equal footing to achieve system-wide decarbonisation.

The lack of systemic CCUS planning could become a bottleneck for hard-to-abate sectors, industrial competitiveness, and the deployment of negative emissions technologies.

The CCSA recommends ENTSOG:

- Clearly **define** CCUS and CO_2 transport as part of the "**energy transition infrastructure**", not just technical or R&D add-ons.
- **Accelerate cooperatio**n with ENNOH, ENTSO-E, and the EC on CCUS in the context of the TYNDP, TEN-E, and EU climate planning.
- Ensure **TYNDP** 2028 includes a dedicated **CCUS infrastructure assessment**, with support from Member States and relevant industrial stakeholders.