



Carbon Capture Impact Legislative Work Group June 10, 2026 Meeting Notes

Meeting Summary

Carbon Capture Impact convened the Legislative Work Group to discuss recent developments on the fiscal year (FY) 2027 appropriations process, ongoing advocacy related to the US Environmental Protection Agency's proposed repeal of the Greenhouse Gas Reporting Program (GHGRP), and emerging opportunities related to Class VI injection well permitting. Staff also provided updates on various Carbon Capture Coalition workstreams, including the development of the 2027 Federal Policy Blueprint, the Coalition's engagement with the US Treasury on alternative reporting mechanisms for 45Q in the proposed absence of the GHGRP, and recent interactions with the EPA's Office of Water on efforts to streamline the Class VI application review process. Members also received a recap of Impact's recent Advisory Council meeting, which focused on messaging tools and 45Q priorities for the 120th Congress. Members were reminded of upcoming activities, including the first Federal Policy Blueprint discussion on transport and storage and an educational webinar on 45Q reporting mechanisms and geologic storage standards.

To access the links below, you will need to use the member password: ccc12345q.

Important Resources

- [Meeting Slide Deck](#)
- [Carbon Capture Coalition Treasury Request for Information Response](#)
- [EPA Office of Water Class VI Meeting Summary Memo](#)

Key-Takeaways

- Carbon Capture Impact's Advisory Council is developing a carbon capture messaging toolkit intended to support member outreach, advocacy, and stakeholder education efforts.
- Impact Advisory Council discussions have begun on potential 45Q priorities for the next Congress, including credit values, credit 'adders' for certain use-cases, and an extension of commence-construction deadlines.
- The House Interior-Environment FY27 appropriations bill maintains support for key Class VI implementation activities and includes additional accountability measures for EPA.
- Treasury is reportedly evaluating additional 45Q guidance and may further expand Safe Harbor provisions following EPA action on the proposed GHGRP repeal.
- EPA is actively pursuing strategies to reduce the Class VI permitting backlog and improve consistency across regional offices.

Next Steps & Action Items

- Participate in the June 16 educational webinar on 45Q reporting mechanisms and geologic storage standards.
- Join the June 17 Federal Policy Blueprint discussion focused on carbon dioxide transport and storage.

Notes

Housekeeping Items

Advisory Council Meeting

Staff provided a recap of Impact's second Advisory Council meeting, which focused on advancing two long-term initiatives: development of member messaging resources and identifying potential 45Q priorities for the 120th Congress.

Carbon Capture Messaging Toolkit

Members reviewed and provided feedback on a draft messaging document that will serve as the foundation for a broader carbon capture communications toolkit designed to support member outreach and advocacy.

Key discussion points included:

- Developing consistent messaging that resonates across congressional, industry, and public audiences.
- Creating adaptable materials that members can use in federal and state advocacy efforts.
- Building resources that improve understanding of carbon management technologies among external stakeholders.

Staff expect to incorporate member feedback over the coming months, with publication of the toolkit anticipated in late summer or early fall.

45Q Priorities for the Next Congress

The Advisory Council also initiated discussion on potential 45Q priorities for the next Congress. While conversations remain preliminary, members identified several areas where additional policy certainty could improve project investment and deployment.

Topics discussed included:

- Increased credit values.
- Extension of commence-construction deadlines.
- Extension of the 12-year credit payment window.
- Complementary policies outside 45Q that could improve overall project economics and lean on the growing interest in clean-firm power.

Staff emphasized that these discussions are intended to inform future Impact advocacy rather than establish formal policy positions at this time. Staff intend to share draft policy recommendations later this summer for broader member review.

Federal Policy Blueprint

Development of the Coalition's 2027 Federal Policy Blueprint continues, with work focused on refining long-term federal policy priorities and incorporating member feedback throughout the drafting process.

- The first topical discussion, focused on carbon dioxide transport and storage, is scheduled for **June 17**.
- Members who are not currently participating in the workgroup are encouraged to join as development continues.

Treasury Request for Information Response

Staff reported that the Coalition submitted comments in response to Treasury's request for input on FY2026–FY2027 priorities before the filing deadline.

The submission:

- Reflects existing Coalition consensus positions on Section 45Q implementation.
- Incorporates recently adopted recommendations regarding Treasury's Safe Harbor guidance.
- Has been shared with members of the Regulatory & Guidance Work Group and posted to the Coalition website.

Political/Congressional Updates

Carbon Capture Impact consultants provided an overview of the current political landscape and congressional outlook, noting that ongoing primary elections, narrow congressional majorities, and the FY2027 appropriations process continue to create uncertainty for the remainder of the year.

Key Topics Covered:

Budget Reconciliation

- Reconciliation 2.0 has now been signed into law, although later than anticipated.
- While discussions surrounding a potential Reconciliation 3.0 package continue, staff indicated that limited legislative time and competing priorities make additional reconciliation legislation increasingly unlikely.

FY2027 Appropriations

- Senate appropriations activity remains delayed as lawmakers continue negotiating topline spending allocations, particularly surrounding defense funding.
- House appropriators continue advancing annual appropriations bills on schedule.
- Staff indicated that a Continuing Resolution remains the most likely outcome at the end of the fiscal year.
- House Interior-Environment appropriations bill passed committee.
 - Key provisions include:
 - Class VI funding maintained at \$5 million.
 - Regulator education and training funding increased to \$2 million.
 - Annual reporting requirement for EPA on Class VI program implementation and primacy applications.

Political Landscape

- Ongoing primary elections continue to reshape congressional dynamics.
- Several establishment candidates have faced significant challenges, contributing to uncertainty regarding committee leadership and legislative priorities heading into the midterm elections.

Treasury & GHGRP

Treasury Activity

Staff shared preliminary indications that Treasury may be evaluating additional guidance related to Section 45Q implementation. While Treasury has not publicly announced a rulemaking, staff continue to hear that additional Safe Harbor guidance remains under consideration.

Key updates included:

- Treasury may expand upon the Safe Harbor provisions released last December.
- Future guidance is expected to be influenced by EPA's final action on the proposed GHGRP repeal.
- Any formal Treasury rulemaking would likely proceed through a notice-and-comment process, creating additional opportunities for stakeholder engagement.

GHGRP

Staff also discussed EPA's ongoing effort to repeal the Greenhouse Gas Reporting Program. Current expectations include:

- EPA is expected to finalize the rule later this fall.
- Treasury guidance is unlikely before EPA completes its rulemaking.
- Coalition/Impact engagement will continue throughout both regulatory processes.

Staff emphasized that continued monitoring of both agencies will remain a priority over the coming months.

Class VI Updates

EPA Office of Water Engagement

Staff provided members with a detailed readout from the recent meeting with EPA's Office of Water regarding implementation of updated guidance for Class VI permit reviews. EPA officials reiterated that reducing the Class VI permitting backlog remains one of the agency's highest priorities while improving consistency across EPA regional offices.

Key updates included:

- EPA is prioritizing review of complete permit applications rather than operating under a strict first-in, first-out process.
- Region 5 intends to prioritize one project type per applicant while working toward issuing approximately nine draft permits before year-end.
- EPA acknowledged that some Region 5 projects may not receive completeness determinations until 2027.
- Permit reviews continue to rely on contractor support rather than national laboratories.

While staff were encouraged by EPA's continued focus on permitting efficiency, members noted that additional clarity is still needed regarding implementation timelines and regional consistency. A detailed memorandum summarizing the meeting will be distributed to members, and EPA Office of Water Senior Counsel Shawn Waldron is expected to participate in a future discussion with Impact members later this summer.